



## **FINDING OF NO SIGNIFICANT IMPACT**

### **Environmental Assessment for a Comfort Station at the Brawner Farm**

#### **Manassas National Battlefield Park Prince William County, VA**

The National Park Service (NPS) proposes to build an accessible, prefabricated comfort station with a septic system and well in Manassas National Battlefield Park (the Park), near the Brawner Farm House contact station. The proposed project site is located in Prince William County, Virginia at the end of the entrance road to the Brawner Farm contact station, north of U.S. Route 29 (U.S. 29) and east of Pageland Road (Virginia Route 622 [VA 622]), in the northwestern portion of the Park and includes portions of the historic Brawner Farm. Figure 1, page 2 of the Environmental Assessment (EA) shows the project location. The comfort station will serve an estimated annual 35,000 visitors and will accommodate the expected increase in visitation during the Sesquicentennial Celebration to take place in August 2012. The facility will be compliant with the Americans with Disabilities Act (ADA 28 Code of Federal Regulations [CFR] Part 36), Architectural Barriers Act of 1968, and Accessibility Guidelines for Buildings and Facilities (ADA-ABA Accessibility Guidelines).

The NPS completed an EA that analyzes potential impacts to the human, natural, and cultural environment from the alternatives considered for approving the construction of a comfort station at the Brawner Farm. This EA was prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), its implementing regulations by the Council on Environmental Quality (CEQ) (40 CFR 1500–1508), and Director’s Order 12, Conservation Planning, Environmental Impact Analysis and Decision-Making and accompanying Handbook.

#### **SELECTED ALTERNATIVE**

Based on the analysis presented in the EA, the NPS has selected alternative 2 for implementation, NPS’s preferred alternative. The selected alternative will construct an accessible comfort station at the Brawner Farm with a septic, well, and water treatment system. The selected alternative is described on pages 17–20 of the EA.

Under the selected alternative, the Park will install a prefabricated, precast concrete, three-room restroom building compliant with ADA-ABA Accessibility Guidelines, including plumbing, electrical, and mechanical systems. The comfort station will be located directly west of the existing parking area and within the parking circle. A 3-foot-wide sidewalk will encompass the building and a 5-foot-wide sidewalk will be constructed along the edge of the parking area. The overall footprint of the building will be between 420 square feet and 575 square feet.

The facility will also include a septic system incorporating two designated drip fields (primary and reserve), which will be located north of the parking area. The primary drip field will be for immediate use and the reserve drip field will be for future use. Each drip field will be 60 feet by 114 feet. New electric service to the facility will provide operation of the lights, well system, heating system, and water treatment system.

#### **OTHER ALTERNATIVES CONSIDERED**

In addition to the NPS selected alternative described above, the EA analyzed a no action alternative (alternative 1) and one other action alternative (“Alternative 3: Construct an Accessible Vault Toilet Facility at the Brawner Farm”).

## **NO ACTION ALTERNATIVE**

Under the no action alternative, a comfort station would not be built at the Brawner Farm parking area. The existing two Porta-Johns (one handicap) would remain at the site, and existing full restroom facilities within other areas of the Park would continue to be used. Currently, the closest ADA accessible public comfort station is located 0.5 mile south of the Brawner Farm parking area at Stuart Hill Park Headquarters across Lee Highway, off Pageland Lane. This facility includes men's and women's restroom facilities and was built in 1996. Both restrooms are at the end of a short sidewalk connecting to two accessible parking spots.

## **ALTERNATIVE 3: CONSTRUCT AN ACCESSIBLE VAULT TOILET FACILITY AT THE BRAWNER FARM**

Under alternative 3, the Park would install a prefabricated, precast concrete, vault toilet facility compliant with ADA-ABA Accessibility Guidelines. The comfort station would be located in the same area described under the selected alternative. A septic system, well, and water treatment system would not be included as part of construction; as such, drip fields and well installation would not be necessary for this alternative. A waste collecting vault would be installed below ground level and would be made of 4-inch thick reinforced concrete. A 3-foot-wide sidewalk would encompass the building and a 5-foot-wide sidewalk would be constructed along the edge of the parking area. The overall footprint of the building would be between 420 square feet and 575 square feet. Photos of the proposed facility site are shown in figure 2 on page 18 of the EA (same as the selected alternative).

Typical prefabricated vault toilet facilities include one stall for the women's and men's restroom; because the Park wishes to install two stalls for men and women, two prefabricated facilities would be placed side-by-side. Alternative 3 was not chosen as the preferred alternative because it does not provide a facility with flushable toilets, running water (including a water fountain), electricity, or heat, resulting in less beneficial impacts to visitor use. Additionally, alternative 3 would result in long-term minor to moderate adverse impacts to park operations due to increased staffing and maintenance of the facility.

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

The NPS is required to identify the environmentally preferable alternative in its NEPA document for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and the CEQ *NEPA's Forty Most Asked Questions*, defines the environmentally preferable alternative as the one that "causes the least damage to biological and physical environment." It is the alternative "which best protects, preserves, and enhances historic, cultural and natural resources" (Q6a).

After completing the environmental analysis, the NPS identified the selected alternative as the environmentally preferable alternative in this EA because it best meets the definition established by the CEQ. The selected alternative best meets the project purpose and need while protecting and enhancing the historical resources of park and minimizing disruption to the natural environment.

Alternative 1 would not provide a comfort station at the Brawner Farm, resulting in an adverse effect on visitor use and experience within the Park. Alternatives 2 and 3 would provide a comfort station; however, the selected alternative will have a greater beneficial impact to visitor use and experience by providing a facility with flushable toilets, running water (including a water fountain), electricity, and heat. Alternative 3 would not include any of these amenities. Additionally, the selected alternative will have less of an impact on park operations and maintenance due to fewer maintenance requirements when compared with a vault toilet option. The General Management Plan (GMP) proposes to convert the Brawner Farm into the main contact station for the Second Battle of Manassas. Given the intention to make the Brawner Farm an area of higher use within the Park, the selected alternative will have a greater beneficial impact to visitor use and experience as well as park operations and management with the construction of a full restroom facility. There are no measureable differences between impacts to soils and vegetation when compared between alternatives 2 and 3. The greatest impacts under the selected alternative and alternative 3 would occur during the installation of the building structure. The selected

alternative will have additional impacts during the construction of the septic and well system; however, these are expected to be temporary impacts lasting only the duration of construction.

Although the selected alternative and alternative 3 would result in some impacts on the biological and physical environment, those impacts would be localized and minor, with available and feasible mitigation options. Changes to the natural environment would be more than balanced by the ability to provide benefits to visitor use and experience within the Park.

**MITIGATION MEASURES**

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented as part of the selected action alternative.

Mitigation Measures of the Selected Alternative	
Resource Area	Mitigation Measures
Soils	<ul style="list-style-type: none"> <li>• Use silt fencing and other standard erosion control methods during construction.</li> <li>• Use washdown stations to avoid the spread and transfer of invasive species during construction.</li> </ul>
Vegetation	<ul style="list-style-type: none"> <li>• Minimize cutting trees whenever possible, and retain as much tree cover as possible.</li> </ul>
Health, Safety and Accessibility	<ul style="list-style-type: none"> <li>• Install appropriate barriers, safety fencing, and/or signs as appropriate, prior to initiating construction activities on NPS properties. The objective of these measures will be to protect visitors and allow safe passage across or around the area of construction.</li> <li>• The site will be open to visitors during construction; however, when appropriate, and as a safety precaution, safety zones may be established in which visitors will not be allowed. The contractor will post personnel along safety zones to inform visitors of ongoing construction.</li> </ul>
Cultural Resources	<ul style="list-style-type: none"> <li>• The facility will be designed to meet the Secretary of the Interior's Standards, and will be constructed in a location that has minimal effect on the cultural landscape of the Park.</li> <li>• If during construction, archeological resources are discovered, halt all work in the immediate vicinity of the discovery until the resources can be identified and documented and an appropriate mitigation strategy developed. If necessary, consultation with the Virginia Historic Preservation Officer, NPS, and/or the NPS Regional Archeologist will be coordinated to ensure that the protection of resources is addressed. In the unlikely event that 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 (25 USC 3001) of 1990 will be followed.</li> </ul>

**WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As documented in the EA, the NPS has determined that the selected alternative, alternative 2 (NPS preferred alternative), can be implemented without significant adverse effects. As defined in 40 CFR 1508.27, significance is determined by examining the following criteria:

*Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an Environmental Impact Statement (EIS):* Soils, vegetation, visitor use and experience, cultural landscapes, and park operations and management will experience both beneficial and adverse impacts as a result of implementing the selected alternative; however, no significant impacts were identified that will require analysis in an EIS.

Construction of a new comfort station, septic system, and well under the selected alternative will disturb, modify, and expose soils as the result of grading and other construction activities, including utility trenching, and will result in short-term negligible to minor adverse impacts on soils. The loss, modification, and disturbance of soils from the construction of a new comfort station will increase potential for stormwater runoff and erosion and result in long-term minor adverse impacts on soils due to the localized nature of the impacts. The construction of the septic system and the requirements placed on soils by the drip fields will result in localized long-term negligible to minor adverse impacts. The selected alternative will have short-term negligible adverse impacts to vegetation due to continued lawn manicuring at the site and long-term negligible to minor adverse impacts due to the loss of vegetation at

the facility site. Implementation of the selected alternative will result in long-term beneficial impacts on visitor use and experience as a result of ADA-accessible restroom facilities within a reasonable distance from the Brawner Farm and the added amenities associated with the selected alternative. There will also be some short-term minor adverse impacts to visitor use from construction noise that will no longer occur once construction is completed. As currently designed, the facility could have long-term negligible to minor visual impacts due to the historically open landscapes of battlefields. The comfort station will be situated adjacent to an existing parking lot and in an area where a restroom will be expected by park visitors. The construction of the building will not affect the overall character of the cultural landscape. Impacts will not affect the character-defining features of a cultural landscape listed in or eligible for listing on the National Register of Historic Places (NRHP), resulting in no adverse effect on cultural landscapes. The selected alternative will result in short-term minor adverse impacts on park operations and management during construction activities and long-term negligible to minor adverse impacts due to the increase in staffing duties for upkeep of the comfort station and long-term beneficial impacts due to the additional restroom for staff use in the Brawner Farm area.

***Degree of effect on public health or safety:*** In general, construction activities have the potential to increase the risk to health and safety and limit visitor access in a given area. Heavy equipment will be present in the parking area when the prefabricated facility is delivered and assembled and during construction of the septic and well system. For this project, the access point from Pageland Lane will remain open during construction and visitors will still be allowed to visit the Brawner Farm. Due to the nature of a construction zone, potential risks may be present; however, appropriate mitigation measures (shown in the table above) will be in place to maintain a safe environment as well as reduce and prevent potential accidents in the construction zone. Mitigation measures include the use of appropriate signage, flaggers, fencing, etc., at all times during construction. Due to the implementation of mitigation measures, there will be negligible adverse long-term impacts to health, safety, and visitor access.

***Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas:*** No wetlands, prime farmlands, ecologically critical areas, archaeological resources, threatened and endangered species, wild and scenic rivers, or sites sacred to American Indians or other significant ethnographic resources occur within the vicinity of the project area and none will be impacted by the actions associated with this alternative.

The entire area contains important historic and cultural resources which are the subject of the selected alternative. The Brawner Farm Cultural Landscape Plan (NPS 2005) identifies seven “landscape character areas” at the Brawner Farm including the historic core, south woods, confederate staging area, unfinished railroad, west fields, and Warrenton turnpike. The historic core is the section of the Brawner Farm that has the greatest significance to the Second Battle of Manassas. The proposed comfort station will fall in the west fields landscape category of the Brawner Farm Cultural Landscape Plan, west of the historic core. The west fields have the least significance to the battle, but still retain the open battlefield character; however in the southwestern most corner a twentieth-century cemetery of the Swart Family (post-Civil War owner) is not historically part of the Brawner (Douglas) Farm. The comfort station will be situated adjacent to an existing parking lot, in an area where a restroom will be expected by park visitors and will not be out of character for the area. As currently designed, the facility could have long-term negligible to minor visual impacts due to the historically open landscapes of battlefields. Impacts will not affect the character-defining features of a cultural landscape listed in or eligible for listing on the NRHP, resulting in no adverse effect on cultural landscapes. In a letter dated June 3, 2011, the Virginia State Historic Preservation Office (SHPO) concurred that the project will have no adverse effect on this historic property.

***Degree to which effects on the quality of the human environment are likely to be highly controversial:*** No highly controversial effects in terms of scientific uncertainties as a result of the selected alternative were identified during the preparation of the EA or by the public during the public comment period.

***Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:*** No highly uncertain, unique, or unknown risks were identified during either preparation of the EA or through public comment.

***Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:*** The selected alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

***Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:*** Implementation of the selected alternative will have no significant cumulative impacts. As described in the EA, past, present, and future actions and projects within the project area that could affect soils, vegetation, visitor use and experience, cultural landscapes, and park operations and management include the installation of the access road and parking lot, Manassas National Battlefield Park: Final GMP/EIS, Second Battle of Manassas Sesquicentennial Celebration, and the Environmental Assessment: Dominion Virginia Power Electric Power Transmission Upgrade Manassas National Battlefield Park.

**Soils.** Impacts to soils from past and present projects associated with the 2008 GMP include minor modifications to a number of existing facilities resulting in short and long-term negligible adverse impacts. These projects have required or will require some soil disturbance, including localized erosion and compaction, but will include mitigation to reduce soil loss and erosion. The plan also prescribes resource protection resulting in long-term beneficial impacts on soils. Proper erosion and sediment control measures were used during construction of the paved access road and parking area; however, due to the loss in soil productivity and increased potential for runoff, there are long-term minor to moderate impacts on soils. The Sesquicentennial Celebration is expected to drastically increase the number of visitors to the Park and could increase soil compaction as visitors step off the paved pathways, resulting in short-term negligible impact on soils. Impacts to soils will be localized long-term negligible to minor adverse impacts due to construction projects included in the GMP as well as the previous loss of soil productivity and introduction of impervious surfaces during the construction of the access road and parking lot. When combined with the localized long-term negligible to minor adverse impacts from construction activities and increased impervious surfaces, cumulative impacts on soils will be long-term negligible to minor adverse.

**Vegetation.** Installation of the paved access road and parking area resulted in a permanent loss of vegetation in an area approximately 0.5 mile long by 35 feet wide (doubling in width at the parking area). Due to the loss in vegetation there were long-term minor impacts on vegetation during the installation of the access road. The GMP proposes to remove 327 acres of second-growth forest in order to rehabilitate portions of the historic landscapes and allow 82 acres to regenerate through natural succession back to oak-hickory forest. The GMP anticipates that based on the anticipated acreage of woodland cleared, minor long-term adverse impacts will occur from the disruption of the habitat. The Sesquicentennial Celebration may result in short-term negligible impacts on vegetation due to an increased number of people visiting the area and walking off established paths. Vegetation may be temporarily matted down due to high activity; however, it is assumed vegetation will return to normal conditions after the celebration. These impacts, in combination with the long-term negligible adverse impacts of the selected alternative will result in short and long-term negligible to minor adverse cumulative impacts.

**Visitor Use and Experience.** The construction of the access road and parking area has made the area more accessible and convenient to visitors wanting to learn more of the Second Battle of Manassas, resulting in long-term beneficial impacts to visitor use. The Sesquicentennial Celebration could bring the total number of park visitors up to 25,000 for the week during the Second Battle of Manassas anniversary in 2012 (Brown pers. comm. 2011). The Sesquicentennial Celebration will provide numerous educational programs as well as unique visitor use opportunities for a large number of visitors resulting in beneficial impacts on visitor use and experience. The preferred alternative in the GMP aims to provide a level of interpretation inclusive to both battles. Future development and management of the Park will facilitate and deepen visitor understanding of the Civil War and the importance of both battles that occurred at Manassas. Currently, Stuart's Hill is the main visitor contact station for the Second Battle of Manassas;

however, the GMP states this will be relocated to Brawner Farm. The use of Brawner Farm to emphasize the Second Battle of Manassas will have a beneficial impact on visitor experience within the Park. Impacts to visitor use from past, present, and reasonably foreseeable future actions will result in long-term beneficial impacts on visitor use and experience as a result of increased and improved visitor use opportunities.

**Cultural Landscapes.** Impacts to cultural landscapes from past, present, and reasonably foreseeable future actions include the establishment of the paved access road and parking lot, implementation of the GMP, the upgrade of transmission line facilities, and the Sesquicentennial Celebration in August 2012. The establishment of the access road and parking lot altered the historical landscape; however, it resulted in no adverse effect to cultural landscapes. The transmission line EA concluded that the preferred alternative will have negligible to minor impacts to cultural landscapes, resulting in no adverse effects as currently designed. The GMP will benefit cultural landscapes by managing the landscape the Park in a way that keeps it in its historical context. The GMP also aims to increase visitor use and interpretation for events surrounding the Second Battle of Manassas. The Sesquicentennial Celebration will not provide additional historical interpretations specifically at the Brawner Farm; however, it will direct visitors' attention to this part of the Park. Overall, these actions will result in beneficial impacts on cultural landscapes.

**Park Operations and Management.** The establishment of the access road required additional maintenance activities as described on page 57 of the EA. The GMP designates the Brawner Farm House to be converted to the main contact station for visitors to this area of the Park. The conversion will require additional staff to be stationed at the Brawner Farm full time and could require additional park staff to be hired or could reassign staff from other areas of the Park. Greater numbers of visitors could be expected as a result of the GMP and the Sesquicentennial Celebration and will require more frequent cleaning of the area, resulting in long-term and short-term minor adverse impacts. When combined with the short-term minor adverse impacts on park operations and management during construction activities and long-term beneficial and long-term negligible to minor adverse impacts due to the increase in staffing duties, there will be long-term minor adverse cumulative impact on park operations and management.

***Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on NRHP or may cause loss or destruction of significant scientific, cultural, or historical resources:*** In accordance with the provisions in 36 CFR 800.8(c), the NPS set out to use the process and documentation required for the preparation of this EA to comply with Section 106 of the National Historic Preservation Act (NHPA). All consultations with the SHPO, as mandated in Section 106 of the NHPA, were completed separate from the EA and were incorporated into the "Cultural Landscapes" sections of the EA. An archeology survey of the site was completed in 2010 and no additional archeological sites or cultural surface/subsurface features or deposits relating to the Brawner Farm Site or the Civil-War era battles were identified. In March 2011, after the completion of archeological surveys, the location of the facility was changed. On April 8, 2011, the Park sent a letter to the SHPO asking for concurrence that no significant archaeological resources were identified in the areas surrounding or adjoining the facility location, as depicted on the 30% submission drawings for the proposed restroom facility. Concurrence was received on April 9, 2011. On May 27, 2011, an Assessment of Actions Having an Effect on Cultural Resources was submitted to the Virginia SHPO. The assessment documented that the proposed action will "add non-historic features/elements (including visual, audible, or atmospheric) to a historic setting or cultural landscape" and it was determined that further consultation under 36 CFR 800 will be needed. On June 2, 2011, a letter was sent to the SHPO requesting concurrence that the project will have no adverse effect on the Brawner Farm historic property. The SHPO received the letter and on June 3, 2011 and concurred that under the criteria stated in 36 CFR Part 800.5, the project will have no adverse effect on the historic property.

***Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:*** In accordance with Section 7 of the *Endangered Species Act of 1973*, NPS has solicited comments from the U.S. Fish and Wildlife Service (USFWS) and the Virginia Department of Conservation and Recreation (VDCR) regarding potential occurrences of federal and state-listed species within the project area that could be adversely impacted by the proposed alternatives. Coordination with

federal agencies was conducted in previous NEPA processes and was concurrent with the completion of the EA Dominion Virginia Power Electric Power Transmission Upgrade of the Park in March 2009 (NPS 2009). The aforementioned coordination was still considered relevant for this project.

Correspondence with the USFWS and VDCR occurred as part of the transmission line upgrade EA completed in 2006 and 2009. In accordance with Section 7 of the *Endangered Species Act of 1973*, in December 2008, a letter was sent to the USFWS to solicit comments regarding potential occurrences of any federal or state listed species within the project area that could be adversely impacted by the proposed alternatives. A letter of response was received on January 21, 2009 from the USFWS recommending consultation with the Virginia Department of Agriculture and Consumer Services (VDACS) and surveys for the small whorled pogonia. Consultation, as part of the transmission line project, included a letter dated August 17, 2006 from the Virginia Department of Game and Inland Fisheries that identified no known rare, threatened, or endangered species in the vicinity of the study area at the Park. However, during public scoping, the VDCR submitted a comment on the NPS Planning, Environment, and Public Comment (PEPC) website dated March 17, 2011. The letter indicated that the current activity will not affect any documented state-listed plants or insects under the Memorandum of Agreement established by the VDACS and VDCR. Additionally, VDCR files did not indicate the presence of any State Natural Area Preserves under VDCR jurisdiction in the project vicinity. However, this letter stated that this portion of the Park was within the Manassas Diabase Conservation Area and could support the growth of marsh hedgenettle (*Stachys arenicola*). Field surveys for the target species were conducted on June 13, 2011 and no individual or populations of the species were found. The *Rare Plant Survey, Brawner Farm Report*, dated June 15, 2011, was prepared by The Louis Berger Group, Inc. (LBG) and submitted to VDCR by the Park. In a letter dated October 17, 2011, the VDCR provided comments on the rare plant report. The LBG addressed VDCR's comments and submitted a revised copy of the rare plant survey report on October 18, 2011. The VDCR concurred with the negative results of the revised survey report in a letter dated October 24, 2011 and no impacts to the marsh hedgenettle are expected.

***Whether the action threatens a violation of federal, state, or local environmental protection law:*** The selected alternative violates no federal, state, or local environmental protection laws.

## **IMPAIRMENT OF PARK RESOURCES OR VALUES**

In addition to reviewing the list of criteria for significant impacts, the NPS has determined that implementing the NPS selected alternative will not constitute an impairment of park resources or values. This conclusion is based on a thorough analysis of the impacts described in the EA, agency and public comments received, and the professional judgment of the decision-makers in accordance with NPS *Management Policies 2006*. As described in the EA, implementation of the NPS selected alternative will not result in impairment of the Manassas National Battlefield resources or values whose conservation is: (1) necessary to fulfill specific purposes identified in the Park's establishing legislation, (2) key to the natural or cultural integrity of the Park or to opportunities for enjoyment of the Park, or (3) identified in the Park's management plan or other relevant NPS planning documents as being of significance.

The selected alternative will result in short-term to long-term negligible to minor adverse impacts on some park resources, which include soils, vegetation, and cultural landscapes.

***Soils*** - The GMP lists service-wide mandates and policies pertaining to the Park. The GMP states, the Park "actively seeks to understand and preserve the soil resources of the Park, and to prevent, to the extent possible, the unnatural erosion, physical removal, or contamination of the soil, or its contamination of other resources. Natural soil resources and processes function in as natural a condition as possible, except where special considerations are allowable under policy" (GMP 2008).

Construction activities under the selected alternative will result in localized areas of ground disturbance at the comfort station site, sidewalk, and areas associated with the septic and well systems. Although the selected alternative will include the clearing of vegetation and exposure of soils, the impacts will be limited to the project areas and soil productivity and characteristics will not change in the area outside of the limit of disturbance. Soil productivity at the surface will be permanently lost at the location of the comfort station and sidewalk; however, soil productivity will return to preconstruction conditions in all other areas of disturbance. The total area soil disturbance (temporary and permanent) will be 0.56 acres

of the more than 5,000 acres within the Park. The use of permeable materials and erosion control measures will ensure the alternative will not increase sedimentation within the Park. Soils throughout Manassas are mostly previously disturbed and will not experience significant adverse impacts as a result of implementation of the preferred alternative. The GMP includes minor modifications to a number of existing facilities which have required or will require some soil disturbance, including localized erosion and compaction, but will include mitigation to reduce soil loss and erosion.

Because the selected alternative will not inhibit the Park's ability to protect natural resources, including stabilized and productive soils, and will not prevent the Park from fulfilling the specific purposes identified in the establishing legislation and the GMP, the alternative will not result in impairment of soils.

**Vegetation** - The GMP lists service-wide mandates and policies pertaining to the Park. The GMP states, the Park "will maintain as parts of the natural ecosystem all native plants and animals in the Park. The NPS will achieve this maintenance by (1) preserving and restoring natural abundances, diversities, dynamics, distributions, habitats, and behaviors of native plant and animal populations and the communities and ecosystems in which they occur; (2) restoring native plant and animal populations and the communities in parks when they have been extirpated by past human actions; and (3) minimizing human impact on native plants, animals, populations, communities, and ecosystems and the processes that sustain them" (GMP 2008).

Part of the mission of the Park is to protect and preserve natural vegetation throughout the Park. On March 17, 2011, a letter was received from the VDCR, recommending an inventory for the rare plant, marsh hedgesettle because the proposed site is within a Manassas Diabase Uplands Conservation Site and could contain the natural heritage resource. Under direction of this letter, surveys for the marsh hedgesettle were completed on June 13, 2011 and no species or populations were found. The VDCR concurred with the negative results of the rare plant survey in a letter dated October 24, 2011 and no impacts to the marsh hedgesettle are expected. In preparation for construction activities, grading and leveling on construction areas will occur in areas currently maintained as turf or natural vegetation. As a result of construction activities, vegetation in the area of construction will be disrupted and removed. The selected alternative will have localized areas of ground disturbance at the comfort station site, sidewalk, and areas associated with the septic and well systems. Although the selected alternative will include the clearing of vegetation, the impacts will be limited to the project areas and characteristics will not change outside of the area of disturbance. There will be a permanent loss of vegetation at the location of the comfort station and the sidewalk, however soil productivity will return to preconstruction conditions in all other areas of disturbance. The total area of vegetation removal (temporary and permanent) will be limited to 0.56 acres of the more than 5,000 acres within the Park. The 2008 GMP proposes to remove 327 acres of second-growth forest in order to rehabilitate portions of the historic landscapes and allow 82 acres to regenerate through natural succession back to oak-hickory forest. Though the GMP requires the removal of vegetation, the cultural landscape will be preserved and it should positively impact the visitor experience within the Park.

The selected alternative does require the removal of brush and low growing vegetation. Since the selected alternative will not inhibit the Park's ability to protect natural resources and will not prevent the Park from fulfilling the specific purposes identified in the establishing legislation and the GMP, the alternative will not result in impairment of vegetation.

**Cultural Landscapes** - The GMP lists service-wide mandates and policies pertaining to the Park. The GMP states, "Cultural landscape inventories are conducted to identify landscapes potentially eligible for listing in the National Register, and to assist in future management decisions for landscapes and associated resources, both cultural and natural. The management of cultural landscapes focuses on preserving the landscape's physical attributes, biotic systems, and use when that use contributes to its historical significance" (GMP 2008).

The Park was established with the intention 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. Impacts to cultural landscapes will be

localized to the portion of the Park surrounding the Brawner Farm. The comfort station is not expected to be seen from the Brawner Farm House or from panoramas within the Park. Additionally, the comfort station will be built in a location where visitors will expect it to be seen and it is not interrupting the historical battlefields. The GMP will further benefit cultural landscapes by managing the landscape at the Park in a way that keeps it in its historical context. The GMP also aims to increase visitor use and interpretation for events surrounding the Second Battle of Manassas.

The selected alternative will allow the NPS to fulfill the purpose of the Park by protecting and preserving the Park's cultural resources without adversely impacting the cultural landscapes and will not prevent the Park from fulfilling the specific purposes identified in the establishing legislation or the GMP; therefore the preferred alternative will not result in impairment of cultural landscapes.

## **PUBLIC INVOLVEMENT**

The public scoping process was initiated on February 16, 2011, when the NPS sent 308 public scoping letters to addresses on the Park mailing list, which included state and county regulatory departments, nearby residents, and community organizations. The public scoping period was also announced on PEPC website. Appendix B of the EA contains public scoping letters and announcements.

The public scoping period began on February 16, 2011 and concluded on March 18, 2011, as announced in a public scoping letter (appendix B). During the public scoping comment period, the NPS received seven comments via email and four comments through PEPC. Comment topics were generally positive and in support of the construction of a comfort station at the Brawner Farm. Prince William County will have no objections to the project as long as all Virginia Erosion and Sediment Control measures are installed and maintained. The VDCR stated that if the project includes more than 2,500 square feet, a Virginia Stormwater Management Program permit and a complete Stormwater Pollution Prevention Plan will be required.

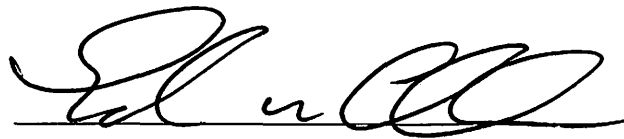
The EA was made available for public review and comment on September 6, 2011. It was also announced by placing a notice of availability in local newspapers and by posting an announcement on the NPS PEPC website. The NPS also mailed a printed copy of the EA to VDCR and the Virginia SHPO. The comment period concluded on October 6, 2011. The NPS did not receive any additional pieces of correspondence commenting on the proposed action.

## CONCLUSION

The NPS has selected alternative 2 for implementation. In light of the impacts described in the EA for the project and with guidance from NPS *Management Policies 2006*, natural and cultural resources information, professional judgment and considering agency and public comments, the impacts that will result from the selected alternative will not impair any park resources and values. The selected alternative does not constitute an action that normally requires preparation of EIS. The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are negligible to minor in intensity. There are no significant impacts on soils, vegetation, visitor use and experience and recreation resources, cultural landscapes, or park operations and management. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

Based on the foregoing an EIS is not required for this action and thus will not be prepared. This is a finding of no significant impact.

Recommended:

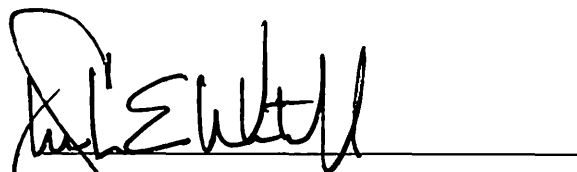


Edward W. Clark  
Superintendent,  
Manassas National Battlefield Park

12/22/11

Date

Approved:



Steve Whitesell  
Regional Director  
National Capital Region

1.13.12

Date

## ATTACHMENT 1: ERRATA

### MANASSAS NATIONAL BATTLEFIELD PARK ENVIRONMENTAL ASSESSMENT FOR A COMFORT STATION AT THE BRAWNER FARM

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The following changes have been made to the EA for a Comfort Station at the Brawner Farm for the Park (September 2011) to correct minor statements of fact and update information. These changes do not change the alternatives as they are written or affect the overall conclusions made as part of the impact analysis.

Additions to the text are identified by underlines and deletions are marked by strikeout unless otherwise noted.

#### 1. CHAPTER 2: MITIGATION MEASURES OF THE ACTION ALTERNATIVES

*The change below was made to correct a minor factual error.*

##### CULTURAL RESOURCES

- If during construction, archeological resources are discovered, halt all work in the immediate vicinity of the discovery until the resources can be identified and documented and an appropriate mitigation strategy developed. If necessary, consultation with the ~~DC~~ VA Historic Preservation Officer, NPS, and/or the NPS Regional Archeologist will be coordinated to ensure that the protection of resources is addressed. In the unlikely event that 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 (25 USC 3001) of 1990 would be followed.

#### 2. CHAPTER 2: ENVIRONMENTALLY PREFERABLE ALTERNATIVE

*The change below was made to clarify the sentence.*

The NPS is required to identify the environmentally preferable alternative in its NEPA documents for public review and comment (Director's Order 12 Handbook, Sec. 4.5 E (9) (NPS 2001)). The environmentally preferable alternative is defined by the CEQ in its *NEPA's Forty Most Asked Questions* as: "The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA Section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).

After completing the environmental analysis, the NPS identified alternative 2 as the environmentally preferable alternative in this EA because it best meets the definition established by the CEQ. Alternative 2 would best protect and enhance the historical resources of park while minimizing disruption to the natural environment, while still meeting the project purpose and need.

Alternative 1 would not provide a comfort station at the Brawner Farm, resulting in an adverse effect on visitor use and experience within the Park. Alternatives 2 and 3 would provide a comfort station; however, alternative 2 would have a greater beneficial impact to visitor use and experience by providing a facility with flushable toilets, running water (including a water fountain), electricity, and heat. Alternative 3 would not include any of these amenities. Additionally, alternative 2 would have less of an impact on park operations and maintenance due to fewer maintenance requirements when compared with a vault toilet option. ~~Implementation of The GMP and proposal proposes~~ proposes to convert the Brawner Farm into the main contact station for the Second Battle of Manassas ~~would meet the need for a full restroom facility at this location.~~ Given the intention to make the Brawner Farm an area of higher use within the Park, alternative 2 would have a greater beneficial impact to visitor use and experience as well as park

operations and management with the construction of a full restroom facility. There are no measureable differences between impacts to soils and vegetation when compared between alternatives 2 and 3. The greatest impacts under alternatives 2 and 3 would occur during the installation of the building structure. Alternative 2 would have additional impacts during the construction of the septic and well system; however, these are expected to be temporary impacts lasting only the duration of construction.

### **3. CHAPTER 4: ENVIRONMENTAL CONSEQUENCES - VEGETATION**

*The change below was made to provide additional information.*

#### **IMPACTS OF ALTERNATIVE 1: NO ACTION**

##### **Cumulative Impacts**

Past, present, and reasonably foreseeable future actions that have the potential to impact vegetation would include the previous establishment of the Brawner Farm access road and parking area, implementation of the GMP, and the Sesquicentennial Celebration. Installation of the paved access road and parking area resulted in a permanent loss of vegetation in an area approximately 0.5 mile long by 35 feet wide (doubling in width at the parking area). Prior to the establishment of the road, this area was maintained to be manicured lawn; therefore, there was not diverse or robust vegetation. Due to the loss in vegetation, there were long-term minor impacts on vegetation during the installation of the access road. The 2008 GMP proposes to remove 327 acres of second-growth forest in order to rehabilitate portions of the historic landscapes and allow 82 acres to regenerate through natural succession back to oak-hickory forest. The GMP anticipates that based on the anticipated acreage of woodland cleared, minor long-term adverse impacts would occur from the disruption of the habitat (NPS 2008). The Sesquicentennial Celebration may result in short-term negligible impacts on vegetation due to an increased number of people visiting the area. Vegetation may be temporarily matted down due to high activity; however, it is assumed vegetation would return to normal conditions after the celebration, resulting in short-term minor adverse impacts. These impacts, in combination with the long-term negligible adverse impacts of alternative 1, would result in short- and long-term negligible to minor adverse cumulative impacts.

### **4. CHAPTER 5: CONSULTATION AND COORDINATION**

*The change below was made to provide additional information.*

#### **FEDERAL AGENCY COORDINATION AND CONSULTATION**

Coordination with federal agencies was conducted in previous NEPA processes and was concurrent with the completion of the Environmental Assessment Dominion Virginia Power Electric Power Transmission Upgrade at Manassas National Battlefield Park in March 2009 (NPS 2009). The EA identified issues or concerns related to natural and cultural resources found within the study area at Manassas National Battlefield Park.

All consultations with the Virginia SHPO, as mandated in Section 106 of the NHPA, were completed separate from this EA and were incorporated into the "Cultural Landscapes" section of this EA. An archeology survey of the site was completed in 2010 and no additional archeological sites or cultural surface/subsurface features or deposits relating to the Brawner Farm Site or the Civil-War era battles were identified. The location of the facility was changed in March 2011 after the completion of initial archeological surveys. On April 8, 2011, the Park sent a letter to the Virginia SHPO asking for concurrence to that no significant archaeological resources were identified in the areas surrounding or adjoining the facility location, as depicted on the 30% submission drawings for the proposed restroom facility. Concurrence was received on April 9, 2011. On May 27, 2011, an Assessment of Actions Having an Effect on Cultural Resources was submitted to the Virginia SHPO. The assessment documented that the proposed action would "add non-historic features/elements (including visual, audible, or atmospheric) to a historic setting or cultural landscape" and it was determined that further consultation under 36 CFR Part 800 would be needed. On June 2, 2011, a letter was sent to the Virginia SHPO requesting concurrence that the project would have no adverse effect on the Brawner Farm historic property. The Virginia SHPO received the letter and on June 3, 2011 and concurred that under the criteria

stated in 36 CFR Part 800.5, the project would have no adverse effect on the historic property. A letter was sent to the SHPO requesting concurrence regarding the change in the location of the comfort station on June 2, 2011. The Virginia SHPO received the letter and on June 3, 2011, concurred that no additional archeological surveys would be required at the comfort station site.

A letter was received from the Virginia Department of Health on April 19, 2011, stating that the Prince William Health district is not required to issue a permit for the proposed sewage system because this is federal property and is exempt from state regulations.

Correspondence with the USFWS and VDCR occurred as part of the transmission line upgrade EA completed in 2006 and 2009 and is still considered relevant for this project. In accordance with Section 7 of the *Endangered Species Act of 1973*, a letter was sent to the USFWS to solicit comments regarding potential occurrences of any federal or state listed species within the project area that could be adversely impacted by the proposed alternatives in December 2008. A letter of response was received on January 21, 2009 from the USFWS recommending consultation with the Virginia Department of Agriculture and Consumer Services and surveys for the small whorled pogonia. Consultation, as part of the transmission line project, included a letter dated August 17, 2006 from the Virginia Department of Game and Inland Fisheries that identified no known rare, threatened, or endangered species in the vicinity of the study area at Manassas National Battlefield Park. In a letter dated September 8, 2006, the VDCR Heritage Program designated a number of Diabase Conservation Areas throughout Virginia that support these uncommon plant communities. The portion of the Park within the Manassas Diabase Conservation Area is known to support two state listed rare species, the marsh hedgenettle and purple milkweed. According to the VDCR, there is potential for a number of additional rare plant species that may occur in diabase conservation areas including earleaf foxglove, blue-hearts, downy phlox, and stiff goldenrod. Field surveys were conducted in 2009, per the suggestion of the USFWS and VDCR, and it was determined these species were not present in the study area.

Consultation as part of the project included a letter from the VDCR dated March 17, 2011. ~~and stated that this portion of the park was within the Manassas Diabase Conservation Area and could support the growth of *Stachys arenicola* (marsh hedgenettle). Field surveys were conducted on June 13, 2011 and no individual or populations of the species were found. The park will continue to consult with the VDCR to obtain concurrence with the survey methodology and results. The letter dated March 17, 2011 also stated that the current activity will not affect any documented state listed plants or insects. VDCR files did not indicate the presence of any State Natural Area Preserves under VDCR jurisdiction in the project vicinity. The letter indicated that the current activity will not affect any documented state-listed plants or insects under the Memorandum of Agreement established by the Virginia Department of Agriculture and Consumer Services (VDACS) and VDCR. Additionally, VDCR files did not indicate the presence of any State Natural Area Preserves under VDCR jurisdiction in the project vicinity. However, this letter stated that this portion of the Park was within the Manassas Diabase Conservation Area and could support the growth of *Stachys arenicola* (marsh hedgenettle). Field surveys for the target species were conducted on June 13, 2011 and no individual or populations of the species were found. The *Rare Plant Survey, Brawner Farm Report*, dated June 15, 2011, was prepared by The Louis Berger Group, Inc. (LBG) and submitted to VDCR by the Park. In a letter dated October 17, 2011, the VDCR provided comments on the rare plant report. The LBG addressed the VDCR's comments and submitted a revised copy of the rare plant survey report on October 18, 2011. The VDCR concurred with the negative results of the revised survey report in a letter dated October 24, 2011 and no impacts to the marsh hedgenettle are expected.~~