



NEW ENTRANCE TO CHOPAWAMSIK BACKCOUNTRY AREA

Finding Of No Significant Impact

June 2012

Prince William Forest Park (the Park) an administrative unit of the National Park Service (NPS), in coordination with the United States Department of the Navy, Quantico Marine Base (Quantico), is proposing to construct a new entrance to the Chopawamsic Backcountry Area. The project area is located in Prince William County, Virginia. The project includes a new gravel entrance road from State Route 619 (Joplin Road) for public access, an approximately 0.5 acre gravel parking lot and vault toilet system, as well as the clean up of Bobcat Ridge Road, an existing, once drivable road which connected to the Chopawamsic Trail. The project will also incorporate up-to-date wayside exhibits and new signage.

The proposed location for the new entrance and parking lot is an approximately 1.8 acre site near milepost 20 on Joplin Road. The new entrance will utilize an existing entrance of an overgrown fire road, Bobcat Ridge Road. This location will accommodate the proposed entrance, parking area and new toilet facility as well as have the potential for expansion of the parking area in the future if needed. The currently proposed parking area has a .15-acre footprint and will provide 20 parking spaces. Bobcat Ridge Road will also be cleaned up to provide a footpath from the new parking area to the Chopawamsic Backcountry Trail. The Chopawamsic Backcountry Area provides primitive campsites and hiking areas. Due to its sensitive location near Quantico Marine Base, this area will be restricted and park visitors will require a permit and a key to access it.

The purpose of the proposed project is to improve the transportation facilities within the Chopawamsic Backcountry Area of Prince William Forest Park in a way that protects the park's resources and values and that:

- Improves the security on the Quantico Marine Base by providing an alternate access point to the Chopawamsic Backcountry Area as required by the agreement between Quantico and the NPS;
- Improves the operational efficiency of the Chopawamsic access point;
- Limits public access to the family cemeteries, Quantico land and the Breckenridge Reservoir to facilitate Quantico land management practices and improve security; and
- Enhances visitor enjoyment and interpretation of the Park.

Improvements to Prince William Forest Park's transportation facilities are needed because:

- The NPS was directed to provide alternate access to the Chopawamsic Backcountry Area in accordance with the federal land exchange agreement with Quantico and the Draft Recreation Management Plan for Breckenridge Reservoir prepared by NPS and Quantico;
- Operational inefficiencies are occurring at the existing Chopawamsic Backcountry Area access point from Breckenridge Road due to the dual agency locking gates,
- A new public entrance to the Chopawamsic Backcountry Area will allow access to Breckenridge Road to be limited to just the NPS and Quantico staff. Public access to the family cemeteries, Quantico land and Breckenridge Reservoir would be limited to facilitate Quantico land management practices and improve security on the Marine Base; and
- Currently, the visitor experience is diminished by the restroom and parking facilities available in the Chopawamsic Backcountry Area.

The NPS completed an Environmental Assessment (EA) that provides an analysis of the environmental consequences of the alternatives on a variety of resources. The 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 (40 CFR Parts 1500-1508), and Director's Order #12 and accompanying Handbook, *Conservation Planning, Environmental Impact Analysis, and Decision-making* (DO-12).

SELECTED ALTERNATIVE

The NPS has selected Alternative B – New Entrance and Restroom Facility, Restricted Use for implementation. As described on pages 19 and 20 of the EA, this alternative establishes a new entrance at an existing but currently unused fire road (Bobcat Ridge Road), which can be accessed from Route 619 (Joplin Road) near milepost 22. Bobcat Ridge Road has existed for over 30 years and was once a drivable route to the Chopawamsic Trail. The clean up of Bobcat Ridge Road from Joplin Road to the Chopawamsic Backcountry Trail will consist of clearing trash and woody debris. Bobcat Ridge Road will serve as a portion of the footpath between the new parking area and the Chopawamsic Backcountry Trail. A small footpath will be used to direct visitors from the parking area to Bobcat Ridge Road, which will provide access to the hiking trail.

There are six options for the parking lot design: three designs providing approximately 20 parking spaces and three designs providing approximately 40 parking spaces. Each design includes an open gravel parking lot, wheel stops, an ADA compliant handicap parking space, and an ADA accessible vault toilet. The Park has selected Option 2 for implementation since it provides the most parking spaces per acre and will meet the estimated demand for parking in this area. Option 2 provides 20 parking spaces within a .15-acre footprint. This option will also allow the site to be expanded to include 11 additional parking spaces (Option 2A) if future visitor use of the area increases to the point of needing additional parking capacity.

The footprint of the vault toilet is expected to be about 7.5 feet by 16 feet and the pit will be approximately 5 feet deep. The toilet would be located in the southwest corner of the parking lot, directly adjacent to the trailhead.

Operationally, under this alternative, access to the Chopawamsic Backcountry Area will require visitors wishing to access the area to obtain a permit and a key from Park staff at the visitor center to unlock the gate. The gate will remain locked at all times. A permit will also be required for campers. The Park will continue to limit the number of individuals in the Chopawamsic Backcountry Area to 50. Approved recreational activities will include hiking, camping, and fishing. No bicycles or boats will be permitted.

OTHER ALTERNATIVES CONSIDERED

The Environmental Assessment prepared for this project also analyzed the no action alternative (Alternative A) and one other action alternative (Alternative C – New Parking Area and Restroom Facility, Unrestricted Use). The no action alternative was not selected because it did not meet the purpose and need of the project and for reasons associated with resource protection and visitor experience. While the no action alternative would have no impacts on soils, and vegetation, short-term and long-term minor adverse impacts on the potential cultural landscape would occur due to continued degradation of Bobcat Ridge Road. The no action alternative would also have a long-term negligible adverse impact on visitor use and experience due to the appearance and condition of the existing facilities and the lack of easy access to the Chopawamsic Backcountry Area.

Alternative C differs from Alternative B only in that it allows unlimited public access and use of the Chopawamsic Backcountry Area. Unlimited access to the Chopawamsic Backcountry area would represent a shift in park policy regarding the safety and security of the Breckenridge Reservoir, which supplies drinking water source for Quantico Marine Base. This Alternative was not selected because it did not meet the purpose and the need of this project which includes improving security for the Quantico Marine Base.

Alternative C would have short term minor adverse, long term moderate adverse impacts on park management and operations due the additional law enforcement monitoring and Park staff involvement required during the construction phase of the project as well as afterwards with the unrestricted public access to the area. It would also have long term beneficial impacts to park management and operations due to the improved efficiency afforded by the new entrance.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The NPS is required to identify the environmentally preferred alternative in its NEPA documents for public review and comment [DO-12 Handbook, Sect. 4.5 E(9)]. The environmentally preferred alternative is defined by the Council on Environmental Quality in their *NEPA's Forty Most Asked Questions*: "The environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA's 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 determined that Alternative A (no action) is the environmentally preferred alternative because it best meets the definition established by the U.S. Council on Environmental Quality. This alternative would offer the smallest impact on the environment to provide for the long-term preservation of the Park's resources. However, this alternative was not selected because it did not meet the purpose and need for this project.

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, protective measures will be implemented as part of the selected alternative. The NPS will implement an appropriate level of monitoring throughout the construction to help ensure that protective measures are being properly implemented and are achieving their intended results.

General Mitigation Measures:

- The NPS project manager will ensure that the project activities remain confined within the parameters established in the compliance documents and that the mitigation measures are properly implemented.
- Construction zones outside of the existing disturbed area will be identified and fenced with construction fencing or some similar material prior to any construction activity. The fencing will define the construction zone and confine activity to the minimum area required for construction.
- Staging areas will be fenced. Any temporary fencing established around staging areas will be inspected at least weekly, and corrective actions will be taken to maintain the integrity of the tortoise barrier.
- All protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities beyond the construction zone, as defined by the construction zone fencing. This includes necessary temporary structures such as erosion control fencing.
- All tools, equipment, barricades, signs, surplus materials, and rubbish will be removed from the project work limits upon project completion. Any asphalt surfaces damaged due to work on the project will be repaired to original condition. All demolition debris will be removed from the project site, including all visible concrete and metal pieces.
- Contractors will be required to properly maintain construction equipment (i.e., mufflers) to minimize noise from use of the equipment.

- A hazardous spill plan will be in place, stating what actions will be taken in the case of a spill and identifying preventive measures to be implemented, such as the placement of refueling facilities, storage, and handling of hazardous materials, etc.
- Equipment used on the project will be maintained free of external petroleum based products while working at the project locations.
- Where appropriate, vegetable or mineral oil based grease, hydraulic oil, and bar and chain oil will be used. These lubricants are less toxic than typical lubricants and are biodegradable.
- All equipment on the project will be maintained in a clean and well functioning state to avoid or minimize contamination from automotive fluids; all equipment will be checked daily.
- A certified COTR will be present within the Park during site preparation and construction activities, and will enforce contract specifications and mitigation measures.

Cultural Resource Mitigation Measures:

- If during construction, archaeological resources are discovered, all work in the immediate vicinity of the discovery will be halted until the NPS can complete its compliance responsibilities under 36 CFR Part 800. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (25 USC 3002) will be followed. If non-Native American human remains are inadvertently discovered, the NPS shall follow the Department of the Interior's guidelines concerning human remains and any applicable state laws.
- Project design will minimize adverse effects to Bobcat Ridge Road by avoiding cutting, scraping, grading, or other excavation to the roadbed, adding a protective layer of mulch or gravel to the roadbed where needed to control erosion, and limiting use of the roadbed trail to foot traffic except for emergency vehicles.

Natural Resource Mitigation Measures:

- Precautions will be taken to restrict emissions of oxides (NO_x) and volatile organic compounds (VOC) as the project is located in an ozone non-attainment and emission control area.
- Measures will be taken to ensure that fugitive dust is kept to a minimum. These measures include: use of water or chemicals for dust control where possible; installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials; covering of open equipment for conveying materials; and prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.
- DEQ NRO will be contacted prior to the operation of fuel-burning or other air-pollution-emitting equipment
- An erosion or sediment control plan (ESC) will be developed in compliance with state and local laws.
- Erosion control devices (silt fencing) will be placed around the affected area to mitigate for erosion. Silt fencing will be monitored daily to inspect for holes or breaches.
- The COTR will monitor for terrapin each day while silt fencing and construction is taking place. The COTR will monitor at the beginning of each day and periodically throughout each day of construction. If a terrapin is found it will be placed just outside of the silt fence and not relocated to another area in the Park.
- Construction and site preparation will not be conducted during precipitation events or within 3 hours of a precipitation event.

- PRWI and the contractor will register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP).
- PRWI will contact the Prince William Health Department regarding applicable sewage regulations and requirements for vault toilets. The installed vault toilet will meet federal, state, and local sewage and/or composting regulations.
- To mitigate for the loss in trees the Park will reach its goal of planting 250 seedlings in 2012. 250 Virginia pine species were planted in April of 2012 at a reclamation site in the northwest corner of the Park. Virginia pine is the natural first successional trees species for the reclaimed site.
- PRWI will complete a Climate Friendly Park Action Plan by September 30, 2012, which outlines goals to reduce the emission of greenhouse gasses by 20% by 2016. In order to reach this goal, the Park will decrease its GHG emissions by 312 metric tons by 2016.
- Any stock piling of soil will take place away from trees. Piling soil at a tree stem can kill the root system of the tree.
- Park natural resource managers will monitor the site on an annual basis for the introduction of non-native plant species. Invasive species at the location will be eradicated through mechanical and chemical control methods.

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 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 EIS. As described in the EA, Cultural Resources, Visitor Use & Experience, and Park Management and Operations will experience both beneficial and adverse impacts as a result of implementing the selected alternative. However, no significant adverse impacts were identified that will require analysis in an EIS. Impacts to these resources were assessed for both the construction and the operational phases of the project. A summary of impacts follows:

Vegetation – The selected alternative will result in short and long-term, negligible to moderate adverse impacts to vegetation due to the disturbance of up to .5 acres of vegetation, including the removal of up to 189 trees, for the construction of the gravel parking area, access road and vault toilet, to accommodate increased visitor use.

Soils – The selected alternative will result in short and long-term, negligible to minor impacts to soils resulting from the construction activities, proposed improvements and the increased visitor use.

Cultural Resources - The selected alternative will result in short-term and long-term minor adverse and long-term beneficial impacts on the potential cultural landscape. The proposed changes will alter the northern section of Bobcat Ridge Road, resulting in long term, minor, adverse impacts to the potential cultural landscape, and the rehabilitation of the roadbed will have a short-term, negligible to minor, adverse and long-term beneficial impact.

Visitor Use & Experience - The selected alternative will have a short-term negligible adverse and a long-term beneficial impact on visitor use and experience based the short-term impacts during construction and the improved facilities post-construction.

Park Management and Operations - The selected alternative will have short and long-term minor adverse and long-term beneficial impacts on park management and operations due to the staff involvement during the construction phase of the project, the additional law enforcement monitoring that will be required during and after completion of the project, and the increased efficiency provided by the new entrance.

The degree to which public health and safety are affected. Impacts to human health and safety are not expected under the selected alternative. An access point to the Chopawamsic Backcountry Area will be available from Joplin Road under the selected alternative. No new types of permissible recreational activities are planned for this area of the Park. The area will continue to be used only for hiking and camping.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. No prime farmlands, wild or scenic rivers, ecologically critical areas, wetlands or floodplains occur within or adjacent to the Project Area and none will be impacted by the actions associated with the proposed actions.

Under the selected alternative, the existing roadbed of the old Bobcat Ridge Road will become a trail for accessing the Chopawamsic Trail. A short portion of the northern section of the old road near Joplin Road will have a parking lot, toilet facilities, and a new access to Joplin Road constructed on or near it. Upon completion of this alternative, the remainder of the former Bobcat Ridge Road will be re-opened as a public trail. The visual impact to the overall landscape setting will be apparent during the construction process and will result in short-term, negligible to minor, adverse impacts to the Bobcat Ridge Road cultural landscape. Redesigning the access to Joplin Road will have a long-term, minor, adverse impact. The impact of the proposed rehabilitation of the Bobcat Ridge roadbed will be short-term, negligible to minor, adverse and long-term, beneficial. Visitor use of the area will be expected to increase, but no adverse impacts to potential cultural landscapes will be expected as a result. On February 2, 2012, the State Historic Preservation Office (SHPO) concurred that the project will have no adverse effect on historic properties.

The degree to which the effects on the quality of the human environment are likely to be highly controversial. No highly controversial effects were identified during either preparation of the EA or the public comment period.

The degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks. The effects of the selected alternative are relatively straightforward and easily predicted. No highly uncertain, unique, or unknown risks were identified either during preparation of the EA or the public comment period.

The 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. Implementing the selected alternative will have no significant, cumulative impacts. The EA addressed cumulative impacts for each of the resources affected by the selected alternative. As described in the EA, future projects that could impact these resource areas include the Park Long Range Interpretive Plan, the Park road rehabilitation, the Park RV transportation improvement project, the new Park access entrance on VA 234 and the local and regional development and roadway projects. The implementation of the selected alternative in combination with the impacts from these projects will result in short and long-term, negligible to moderate adverse cumulative impacts to vegetation; short and long-term, negligible to minor, adverse cumulative impacts to soils; and short and long-term, negligible to minor, adverse, and long-term beneficial cumulative impacts on cultural landscapes.

The past roadway rehabilitation project within Prince William Forest Park resulted in a minor long-term adverse impact on the vegetation. The future Park RV project and the Park access from VA 234 will be expected to have a minor adverse impact on native vegetation due to the removal of vegetation for the transportation improvements. The local roadway-widening project will have long-term minor adverse impacts on trees and other vegetation near the roadway due to the vegetation removal and potential for tree root damage outside of the construction area. The residential development project will have a moderate impact on local or regional vegetation due to the removal of a large area of vegetation for the construction of the homes. The combined effects of alternative B along with the cumulative impacts from the past and future foreseeable projects will result in short and long-term, negligible to moderate adverse impacts to vegetation.

The previously implemented or future projects in the area such as the waterline project, the new Park entrance, the Park roadway resurfacing, and the proposed RV Park improvements will have short-term minor adverse impacts to Soils due to the soil exposure and subsequent erosion during construction. The long-term plans for the Park for new exhibits, and the enhancement of interpretive elements at the visitor center will not contribute to soil impacts. The impacts from alternative B, combined with the impacts of the projects identified in the cumulative effects scenario, will result in long-term, minor, adverse cumulative impacts. The overall contribution of this alternative to the cumulative impacts on soils will be negligible.

The previously implemented or future projects in the area such as the Long Range Interpretive Plan, new access entrance on VA-234, the resurfacing of public roads and rehabilitation of parking areas, planned residential communities on VA-234, and the expansion of Route 1 have the potential to change the contributing features or overall character of a potential cultural landscape. The projects will be designed to minimize such impacts. As a result, assuming appropriate mitigation measures are enacted for any adverse impacts from these projects, the cumulative impacts on cultural landscapes resulting from the preferred alternative combined with the impacts from these projects will be short and long-term, negligible to minor, adverse, and long term beneficial.

Projects that would impact Visitor Use and Experience include Prince William Forest Park Long Range Interpretive Plan, various Park improvement projects, and the local and regional development projects. During construction activities, each of these projects would be expected to have short-term minor adverse impacts on visitor use and experience. The past roadway rehabilitation project within Prince William Forest Park resulted in long term beneficial impacts on visitor use and experience due to the improved roadways and parking facilities. The future Park Access Entrance on VA 234 would be expected to have a long-term beneficial impact on visitor use and experience due the appropriately located access point. The future RV Park transportation improvements would be expected to have a long-term beneficial impact on visitor use and experience due to the improved facilities. The local roadway-widening project would be expected to have a long-term beneficial impact on visitor use and experience due to the improved traffic patterns near the Park. The residential development project has the potential to have a long-term beneficial impact on visitor use and experience due to the increased public use of Prince William Forest Park due to visitor proximity. The combined effects of the preferred alternative along with the cumulative impacts from the past and future foreseeable projects would result in short term negligible to minor adverse and long-term beneficial impacts to visitor use and experience.

Past and future foreseeable projects that would impact Park Management and Operations include the past roadway rehabilitation project and the Park Access Entrance on VA 234. The past roadway rehabilitation project within Prince William Forest Park resulted in long term beneficial impacts on park management and operations due to the improved roadways and parking facilities. The future Park Access Entrance on VA 234 would be expected to have a long-term beneficial impact on park management and operations due to the appropriately located access point. The combined effects of the preferred alternative along with the cumulative impacts from the past and future foreseeable projects would result in short and long term minor adverse during construction and long-term beneficial impacts to park operations and management upon completion.

The degree to which the action may adversely affect historic properties in or eligible for listing in the National Register of Historic Places, or other significant scientific, archeological, or cultural resources. As described in the EA, the NPS in consultation with the State Historic Preservation Office (SHPO) has, for purposes of Section 106, determined that the preferred alternative will have no adverse effect on historic properties. On April 23, 2010, the park advised the SHPO of their intent to use the NEPA process to meet its obligations under Section 106 of the National Historic Preservation Act. The EA concluded that implementation of the selected alternative will not preclude a future evaluation of the former Bobcat Ridge Road for National Register eligibility and will have no adverse effect on cultural landscapes or archeological resources. On February 2, 2012, the SHPO concurred that the project will have no adverse effect on historic properties. A copy of the SHPO response is included in Attachment B.

The degree to which an action may adversely affect an endangered or threatened species or its habitat. The only federally threatened or endangered species known to occur within the Park is the small whorled pogonia (*Isotria medeoloides*), a federally threatened orchid. Surveys for the small whorled pogonia have been conducted in the project area and the known colonies are all outside the project area.

In accordance with Section 7 of the Endangered Species Act, consultation letters were sent to the US Fish and Wildlife Services (USFWS), Virginia Department of Conservation and Recreation (VDCR), and the Virginia Department of Agriculture and Consumer Services (VDACS) on April 26, 2010. Copies of these coordination letters are provided in Appendix A. On December 28, 2011, VDCR concurred that the project will have no adverse impact on natural heritage resources. Through a memorandum of agreement, VDCR represents VDACS in comments regarding state listed plant and insect species. VDCR concurred that the proposed action will not affect any documented state-listed plants or insects.

The Department of Environmental Quality provided comments on February 8, 2012 and offered a federal consistency determination (FCD) that the project will be consistent to the policies of the Virginia Coastal Zone Management Project (VCP). Comments are included in the Natural Resources Mitigations Chart included in Appendix B.

Whether the action threatens a violation of federal, state or local law imposed for the protection of the environment. The selective alternative violates no federal, state, or local environmental protection laws. The proposed action will be consistent with all existing local, state, and federal regulations.

PUBLIC INVOLVEMENT

To engage the public in the scoping process for the Chopawamsic Entrance project, Prince William Forest Park sent out project information to the Park's mailing list of approximately 400 individuals or organizations. In addition, a press release announcing the project and soliciting public comment was published in the Quantico Sentry.

A public scoping meeting was held at Prince William Forest Park on October 21, 2010. No members of the public participated in the meeting.

The New Chopawamsic Entrance EA was released for a 46-day public review and comment period beginning December 12, 2011 and ending January 27, 2012. The EA was made available for public review on the NPS Planning, Environment, and Public Comment (PEPC) website.

During the EA public comment period, the NPS received three public comment letters. Each comment provided was considered and reviewed by Park staff. Of the comments received, two were in favor of the proposed project due to the impacts to visitor use, park operations, and safety. Suggestions were made to expand the current internal trail network to access the backcountry; and implement Option 2A to extend the length of the trail and maintain the feeling of a backcountry area. One comment was opposed to the proposed action because it was found to be unnecessary and instead recommended spending time and resources on further trail development. In addition, a letter was received from Stafford County, Board of Supervisors on January 11, 2012. There were no concerns with the project, and the country concurred

CONCLUSION

The NPS has selected Alternative B – New Parking Area and Restroom Facility, Restricted Use, for implementation. The selected alternative is described on pages 19-20 of the EA. The impacts that will result from the selected alternative will not impair any park resource or values necessary to fulfill specific purposes identified in the national park's proclamation (see attached). The selected alternative will not constitute an action that normally requires preparation of an EIS. The selected alternative will not have a significant effect on the human environment. Negative environmental impacts that could occur are minor or moderate in intensity. There are no significant impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. 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, it has been determined that an EIS is not required for this action and thus will not be prepared. This is a finding of no significant impact.

Recommended:


Vidal Martinez, Superintendent
Prince William Forest Park

6/13/12
Date

Approved:


Stephen Whitesell, Regional Director
National Capital Region, National Park Service

6.25.12
Date

ATTACHMENT A
FINAL IMPAIRMENT DETERMINATION
New Entrance to Chopawamsic Backcountry Area
Prince William Forest Park

The Prohibition on Impairment of park Resources and Values

NPS Management Policies 2006, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

What is Impairment?

NPS Management Policies 2006, Section 1.4.5, *What Constitutes Impairment of park Resources and Values*, and Section 1.4.6, *What Constitutes park Resources and Values*, provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible National park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

The NPS has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park (NPS 2006c sec. 1.4.3). However, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS 2006c sec 1.4.3).

Section 1.4.5 of *Management Policies 2006* states:

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Per Section 1.4.6 of *Management Policies 2006*, park resources and values that may be impaired include:

- the park's scenery, natural and historic objects, and wildlife, and the processes and condition that sustain them, including, to the extent present in the park: the ecological, biological, and

physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structure, and objects; museum collections; and native plants and animals;

- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act unless the NPS was in some way responsible for the action.

How is an Impairment Determination Made?

Section 1.4.7 of *Management Policies 2006* states, "[i]n making a determination of whether there would be an impairment, an NPS decision-maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969 (NEPA); consultations required under Section 106 of the National Historic Preservation Act (NHPA); relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision."

Management Policies 2006 further define "professional judgment" as "a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities relation to the decision."

Impairment Determination for the Selected Alternative

This determination on impairment has been prepared for the selected alternative described in this FONSI. An impairment determination is made for all resource impact topics analyzed for the selected alternative. An impairment determination is not made for visitor experience or public health and safety because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

The preferred alternative will result in short and long-term negligible to moderate adverse impacts on some of the park's resources that are considered in the impairment analysis which includes vegetation, soils and cultural landscapes.

As described in the Prince William Forest Park Master Plan, Prince William Forest Park was intended "to provide a suitable playground for the peoples of metropolitan Washington and Northern Virginia (NPS, 1959)" that would provide campsites for the experienced camper, and areas within the park for outdoor recreational activities such as hiking, picnicking, swimming and fishing. The park's mission is to provide a natural and scenic environment for a healthful, interpretive, and spiritual type of outdoor recreation, and to preserve the necessary park and open space to meet the demands of the growing Capital City (NPS, 1959).

Vegetation

Part of the mission of Prince William Forest Park is to provide a natural environment and protect and preserve the park's natural resources, which includes the largest contiguous piedmont forest system in the National Park Service. Under the selected alternative, vegetation removal would be required for the construction of the gravel parking area, access road, and vault toilet. The project would impact a maximum of 189 trees (6,630 square feet in basal area) and remove 403 cubic yards of topsoil. The vegetation within the 0.5 acre impact area contains species that are widespread in the park; no locally rare species are present (NPS, 2011c).

While the selected alternative will impact up to 189 trees within the piedmont forest in Prince William Forest Park, the resulting impacts would only be moderate in intensity, indicating only a small portion of the forest system would be impacted. The park would be able to continue to provide a natural and scenic environment for outdoor recreation and would protect the piedmont forest as a significant natural resource. Since the park would continue to meet the park mission and fulfill the park purpose under the enabling legislation, the selected alternative would not result in impairment.

Soils

Part of the mission of Prince William Forest Park is to protect and preserve the park's natural resources, which includes stabilized soils that support natural vegetation and wildlife habitat within the park. Construction activities, increased visitor use, and the conversion of native soil areas to a gravel parking lot would have a long term minor adverse impact on the soils. Mitigation measures will be in place to limit the impact to the project areas and to prevent sedimentation in Quantico Creek and ultimately the Chesapeake Bay. Since the selected alternative would not inhibit the park's ability to protect natural resources, including stabilized and productive soils, the alternative will not result in impairment.

Cultural Landscapes

Under the selected alternative, the potential cultural landscape near Bobcat Ridge Road and the new parking lot area would be impacted. As a result of the project, visitor use of the area would be expected to increase, which would allow more visitors to experience the cultural significance of the area. While adverse impacts to cultural landscapes would occur under the preferred alternative, they are limited to minor intensity, and long term beneficial impacts would also result, which would allow the park to continue to meet the park mission to preserve and protect cultural resources and fulfill the park purpose under the enabling legislation. Therefore, the selected alternative would not result in impairment of cultural landscapes.

ATTACHMENT B
PUBLIC AND AGENCY CONSULTATIONS
New Entrance to Chopawamsic Backcountry Area
Prince William Forest Park

New Entrance to Chopawamsic Backcountry Area – Environmental Assessment

NPS Response to Comments.

| No. | Commenter | Comment | NPS Response |
|-----|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Private | <p>I think that this new entrance to the backcountry area is greatly needed. In the time I spent in the area it seemed that the shared access road with Quantico greatly restricted access. I think that this parking area will greatly facilitate greater use and ease visitor and park operations related to the use of the backcountry.</p> <p>I think that the plan with the smallest environmental impact is the most preferable. I would also like to see a trail connecting the park area to the trails in the main part of the park at the South Valley Trail along the South Fork of Quantico Creek. Having an interconnected trail network will provide greater opportunities for people to spend longer periods of time hiking throughout the park. It is also imperative that you connect the Farms to Forest Trail to the North Valley Trail to truly have a great trail network.</p> | Comment noted. |
| 2 | Andrew S. Hiller | <p>The park has a good tree biodiversity, for this area of the United States. Now as for the project, I think it is a good idea to build it for the sake of better access in case of emergencies. However, any backcountry should have its limits. This particular backcountry is pretty small and should still feel like a backcountry. This means we don't want so many people out at any one time that we will feel like it is a tourist zone. That is why I would suggest option 2A.</p> <p>Other reasons for choosing 2A is that it reduced the amount of cut down trees and limits the amount of developed ground. I would have chosen option 2, but for just 10 more trees we can have a slightly larger open area without cutting into the denser tree area to the southwest as in option 1.</p> <p>I am speaking for my self and possibly others when I say, we don't need a shorter trail, we are headed to the backcountry. With option 2A the proposed trail to the backcountry will be longer. In my opinion that is better I am in the forest sooner than if I have to walk across a larger open area.</p> | <p>Dear Mr. Hiller:</p> <p>Thank you for your interest and response regarding the EA entitled <i>New Entrance to Chopawamsic Backcountry Area</i>. We received your emailed comments on 01/26/2011 and we will include these comments as part of the public record regarding this project.</p> <p>In regards to your comments concerning the new entrance, we will retain your comments from the public review process and include your thoughts in our decision process. We acknowledge that you are in favor of alternative 2a, which would develop a parking area with 20 parking spaces while only removing 10 more trees as compared to alternative 2, the NPS preferred alternative, which adds a maximum of 10 parking spaces.</p> <p>We look forward to hearing from you concerning the environmental planning process for future projects. We are grateful for your interest and stewardship in Prince William Forest Park. If you have any comments please feel free to contact me at (703) 221-2366, email Vidal_Martinez@nps.gov.</p> |

New Entrance to Chopawamsic Backcountry Area – Environmental Assessment

NPS Response to Comments.

| No. | Commenter | Comment | NPS Response |
|-----|--------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | Dwight Brown | <p>Public Conunent Requested. What do you think? Prince William Forest Park conducted an Environmental Assessment of a proposed new entrance 10 Chopawamsic Backcountry Area. Public comment is requested from 12/16/20 11 to 1116/20 12. Download parts one and two of the EA here.</p> <p>What do I think? I find it disturbing you even consider any new entrance! Or waste money and resources to do an assessment on a needless project such as this. - Do you have a back-log of people at the main entrance who can't find their way into a 17,000 acre park? Last lime I came through was NO! If your job is to support re-pavement and the removal of trees industry your doing a wonderful job. The Paving this year was a total waste of tax payers money. ill planed, inconvenient one full year to repave – geeze, and for what? Last year when I drove through my ride was better than most of the Federal Highway System. the Park beat my normal 30 mile commute for smoothness; but yet u choose to re-pave? I simply don't understand. Get a grip on reality and what WE have. I highly recommend you expand trails to fully connect the North and South trails, that would be a worth while project- give me that to vote on! Unless of course - we know the north is already lost to future development?</p> | <p>Dear Mr. Brown:</p> <p>Thank you for your interest and response regarding the EA entitled <i>New Entrance to Chopawamsic Backcountry Area</i>. We received your emailed comments on 12/26/2011 and we will include these comments as part of the public record regarding this project.</p> <p>In regards to your comment concerning the reason for the new entrance, we would like to reiterate that the main justification for the new entrance to the Chopawamsic Backcountry Area is driven by Quantico Marine Bases need for more security surrounding their main source of drinking water, the Breckenridge Reservoir. Quantico Marine Base and Prince William Forest Park have formal watershed agreements which outline and identify critical issues concerning both the Quantico Creek and Chopawamsic Creek watersheds.</p> <p>The Chopawamsic Creek watershed drains into the Breckenridge Reservoir, a water body that supplies drinking water to a majority of the Base and its inhabitants. Prince William Forest Park is committed to public health and safety, and will continue to cooperate with the Base concerning their drinking water.</p> <p>In response to your comment regarding the loss of trees due to Park projects, we are acutely aware of the public's concern regarding these types of actions. The Park does have a no-net tree loss policy, and in the past couple of years we have planted an average 250 to 350 trees per year. Furthermore, in regards to the repavement of Park roads, the Park conducted an environmental assessment, including a public response period, in 2010. We are committed to ensure the public is made aware of major projects prior to initiation, and we hope you will have ample opportunity to comment on future projects prior to the completion of the projects public review period. To ensure your participation, I would encourage you to sign up to our Park's email list, if you are not already a member.</p> <p>Finally, in response to your comment regarding a trail "to fully connect the North and South trails", we are grateful for</p> |

New Entrance to Chopawamsic Backcountry Area – Environmental Assessment

NPS Response to Comments.

| No. | Commenter | Comment | NPS Response |
|-----|-----------|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | <p>you input regarding future trails. We have received numerous comments regarding a potential trail which would connect the North Valley Trail, where the trail reaches the Burma Road, to the eastern tip of the Farms to Forest Trail. Park staff is currently conducting an internal review of the park trails, and this potential trail is being considered as an addition to our trail system.</p> <p>We look forward to hearing from you concerning the environmental planning process for future projects. We are grateful for your interest and stewardship in Prince William Forest Park. If you have any comments please feel free to contact me at (703) 221-2366 (email Vidal_Martinez@nps.gov).</p> |

PEPC Project ID: 19385, DocumentID: 44604 Correspondence: 2

Author Information

Keep Private: No
Name: Alice R. Baird
Organization: Virginia Department of Conservation and Recreation - Division of Natural Heritage
Organization Type: I - Unaffiliated Individual
Address: 217 Governor Street
Richmond, VA 23219
USA
E-mail: alice.baird@dcv.virginia.gov

Correspondence Information

| | |
|-------------------------|---------------------------|
| Status: New | Park Correspondence Log: |
| Date Sent: 12/28/2011 | Date Received: 12/28/2011 |
| Number of Signatures: 1 | Form Letter: No |
| Contains Request(s): No | Type: Web Form |
| Notes: | |

Correspondence Text

George Liffert
Prince William Forest Park
18100 Park Headquarters Road
Triangle, VA 22191

Re: New Entrance to Chopawamsic Backcountry Area EA/AE

Dear Mr. Pfeifle:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Shirl Dressler at (804) 367-6913.

Should you have any questions or concerns, feel free to contact me at 804-692-0984. Thank you for the opportunity to comment on this project.

Sincerely,

Alli Baird, LA, ASLA
Coastal Zone Locality Liaison

STAFFORD *Virginia*

Board of Supervisors

Susan B. Stimpson, Chairman
Cord A. Sterling, Vice Chairman
Jack R. Cavalier
Paul V. Milde, III
Ty A. Schieber
Gary F. Snellings
Robert "Bob" Thomas, Jr.

Anthony J. Romanello, ICMA-CM
County Administrator

January 11, 2012

Mr. Vidal Martinez
Superintendent, Prince William Forest Park
Resurface Public Roads and Parking Areas
18100 Park Headquarters Road
Triangle, VA 22172

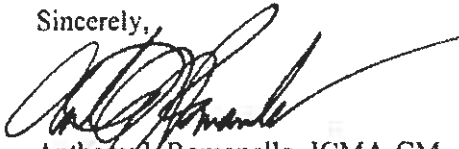
Subject: New Entrance to Chopawamsic Backcountry Area

Dear Mr. Martinez:

As per your request, staff with the Department of Planning and Zoning has reviewed the proposed New Entrance to Chopawamsic Backcountry Area project with respect to potential environmental concerns in Stafford County. Stafford County does not have any significant concerns associated with the project. As described in the Environmental Assessment, the proposed project would have minimal environmental impacts. Staff does concur that Option 2 appears to be the best option since it would provide the necessary parking spaces with the least impact to the environment. Improved access to the Chopawamsic Backcountry within Prince William Forest Park would be beneficial to the residents of Stafford County.

If you have any questions, please feel free to contact Michael Lott at (540) 658-8668.

Sincerely,



Anthony J. Romanello, ICMA-CM
County Administrator

AJR:ml





COMMONWEALTH of VIRGINIA

Department of Historic Resources

Douglas W. Domenech
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

February 2, 2012

Vidal Martinez, Superintendent
Prince William Forest Park
18100 Park Headquarters Road
Triangle, Virginia 22172-1644

RE: PEPC Project No. 19385
Build New Entrance to Chopawamsic Backcountry Camping Area
Prince William County, Virginia
DHR File No. 2008-1722

Dear Mr. Martinez:

Thank you for your letter of January 26, 2011 requesting our concurrence with your determination of No Adverse Effect on historic properties for the referenced project. Supporting documentation included copies of the Environmental Assessment titled *New Entrance to Chopawamsic Backcountry Area* (November 2011) as well as the report of the Identification (Phase I) archaeological survey titled *Archeological Survey of the Proposed Parking Lot in Chopawamsic Backcountry Area* prepared in October 2010 by John Bedell of The Louis Berger Group, Inc. We also appreciate receiving "*Few Knew That Such a Place Exists*" *Land and People in the Prince William Forest Park* also prepared by John Bedell in April 2004. The reports will be a welcome addition to our archives. Based upon the documentation provided, we concur that the proposed project will have No Adverse Effect on historic properties. More detailed comments follow.

Archeological Survey. I am pleased to inform you that the report titled *Archeological Survey of the Proposed Parking Lot in Chopawamsic Backcountry Area* prepared in October 2010 successfully meets the *Secretary of the Interior's Standards and Guidelines for Archeological Documentation (48 FR 4434-37)* and our state *Guidelines for Conducting Cultural Resource Survey in Virginia* (rev. 201). No archaeological sites were identified during the survey. We agree with the consultant's recommendation that no further archaeological investigations are warranted in connection with this project.

Environmental Assessment. We agree with the Park's selection of Alternative 2 as the preferred option. The document appears thorough in its consideration of cultural resources. In particular we note the discussion of impacts to Bobcat Ridge Road which is considered a feature of the potential cultural landscape. The proposed mitigation measures appropriately include the treatment of post-review archaeological discoveries as well as measures to minimize effects on Bobcat Ridge Road by avoiding cutting, scraping, grading, or other excavation of the roadbed, controlling erosion by adding a protective layer of mulch or gravel as needed and limiting use of the roadbed to foot traffic (with the exception of emergency vehicles).

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6416
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Office
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Tidewater Region Office
14415 Old Courthouse Way 2nd
Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5428
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7031
Fax: (540) 868-7033

If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me at (804)482-6088; fax (804) 367-2391; e-mail ethel.eaton@dhr.virginia.gov. We look forward to working with you on future projects.

Sincerely,



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

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6416
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Office
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Tidewater Region Office
14415 Old Courthouse Way 2nd Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

Western Region Office
962 Kime Lane
Salcm, VA 24153
Tel: (540) 387-5428
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7031
Fax: (540) 868-7033



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

TDD (804) 698-4021

www.deq.virginia.gov

Douglas W. Domenech
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

February 8, 2012

Mr. George Liffert
Prince William Forest Park
18100 Park Headquarters Road
Triangle, VA 22191

RE: Draft Environmental Assessment and Federal Consistency Determination:
Department of the Interior/National Park Service, New Entrance to Chopawamsic
Backcountry Area (DEQ 11-208F)

Dear Sir or Madam:

The Commonwealth of Virginia has completed its review of the above-referenced draft environmental assessment (EA), which includes a federal consistency determination (FCD). The Department of Environmental Quality (DEQ) is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act and responding to appropriate federal officials on behalf of the Commonwealth. DEQ is also responsible for coordinating state reviews of FCDs submitted under the Coastal Zone Management Act. The following agencies, locality and planning district commission joined in this review:

Department of Environmental Quality
Department of Agriculture and Consumer Services
Department of Health
Department of Conservation and Recreation
Department of Historic Resources
Department of Forestry
Marine Resources Commission
Northern Virginia Regional Commission
Prince William County

The Department of Game and Inland Fisheries, Department of Transportation and Stafford County also were invited to comment.

PROPOSED ACTION

The National Park Service (NPS) has submitted an EA and FCD for improvement projects at the entrance of the Chopawamsic Backcountry Area of Prince William Forest Park. In cooperation with the U.S. Department of the Navy, Quantico Marine Base, NPS is proposing to construct a new gravel public entrance road from State Route 619 (Joplin Road), an approximately 0.5 acre gravel parking lot and vault toilet system as well as the cleanup of Bobcat Ridge Road within the Chopawamsic Backcountry Area. The project would also incorporate up-to-date wayside exhibits and new signage. The proposed location for the new proposed entrance and parking lot for the Chopawamsic Backcountry Area is an approximately 1.8 acre area near mile post 20 on Joplin Road. The new entrance would utilize an existing overgrown fire road, Bobcat Ridge Road. This area would accommodate the proposed road, parking area and new toilet facility as well as a potential future parking expansion area. The trail cleanup would be on Bobcat Ridge Road from Route 619 (Joplin Road) to the Chopawamsic Backcountry trail. The EA considers Alternative A (no action alternative), the Preferred Alternative B (parking and restrooms with restricted use), which is the Preferred Alternative, and Alternative C (parking and restrooms with unrestricted use). According to the FCD, the project would be consistent with the enforceable policies of the Virginia Coastal Zone Management Program (VCP) (formerly called the Virginia Coastal Resources Management Program).

COMMONWEALTH OF VIRGINIA COMMENTS

1. Wetlands Management and Water Quality. The EA (page 13) states that no streams or wetlands have been identified in the project area.

1(a) Agency Jurisdiction. The State Water Control Board promulgates Virginia's water regulations, covering a variety of permits to include Virginia Pollutant Discharge Elimination System Permit, Virginia Pollution Abatement Permit, Surface and Groundwater Withdrawal Permit, and the Virginia Water Protection (VWP) Permit. The VWP Permit is a state permit which governs wetlands, surface water and surface water withdrawals /impoundments. It also serves as § 401 certification of the federal Clean Water Act § 404 permits for dredge and fill activities in waters of the United States. The VWP Permit Program is under the Office of Wetlands and Water Protection and Compliance within the DEQ Division of Water Quality Programs. In addition to central office staff who review and issue VWP Permits for transportation and water withdrawal projects, the six DEQ regional offices perform permit application reviews and issue permits for the covered activities.

1(b) Agency Comments. The DEQ Northern Regional Office (NRO) states a VWP permit from DEQ may be required should impacts to surface waters become necessary.

1(c) Agency Recommendations. DEQ VWP staff recommends that the project avoid and minimize impacts to the surface waters to the maximum extent practicable.

1(d) Requirement. Prior to commencing any activities that would impact and/or disrupt wetlands and/or surface waters, all required and necessary permits and approvals from the appropriate regulatory agencies should be obtained.

2. Subaqueous Lands Management.

2(a) Agency Jurisdiction. The Virginia Marine Resources Commission (VMRC) regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to § 28.2-1200 through 1400 of the Code of Virginia.

The VMRC serves as the clearinghouse for the Joint Permit Application (JPA) used by the:

- U.S. Army Corps of Engineers (Corps) for issuing permits pursuant to Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act;
- DEQ for issuance of a Virginia Water Protection (VWP) permit;
- VMRC for encroachments on or over state-owned subaqueous beds as well as tidal wetlands; and
- local wetlands board for impacts to wetlands.

The VMRC will distribute the completed JPA to the appropriate agencies. The Virginia Institute of Marine Science (VIMS) serves in a technical advisory role to VMRC during the JPA process.

2(b) Agency Finding. VMRC finds that based on the EA, it does not appear that any of the proposed work is within its jurisdiction.

2(c) Agency Comment. The VMRC, pursuant to Section 28.2-1200 et seq. of the Code of Virginia, has jurisdiction over any encroachments in, on, or over the beds of the bays, ocean, rivers, streams, or creeks which are the property of the Commonwealth. Accordingly, if any portion of the subject project involves any encroachments channelward of ordinary high water along natural rivers and streams above the fall line or mean low water below the fall line, a permit may be required from VMRC. Any jurisdictional impact would be reviewed by VMRC during the JPA process.

2(d) Agency Recommendation. If the project changes and includes impacts to subaqueous lands, coordinate with VMRC regarding the possible submission of a JPA.

3. Air Pollution Control.

3(a) Agency Jurisdiction. The DEQ Air Division, on behalf of the Air Pollution Control Board, is responsible for developing regulations that become Virginia's Air Pollution Control Law. DEQ is charged with carrying out mandates of the state law and related regulations as well as Virginia's federal obligations under the Clean Air Act as amended in 1990. The objective is to protect and enhance public health and quality of life through control and mitigation of air pollution. The division ensures the safety and quality of air

in Virginia by monitoring and analyzing air quality data, regulating sources of air pollution, and working with local, state and federal agencies to plan and implement strategies to protect Virginia's air quality. The appropriate regional office is directly responsible for the issue of necessary permits to construct and operate all stationary sources in the region as well as to monitor emissions from these sources for compliance. As a part of this mandate, the environmental documents of new projects to be undertaken in the state are also reviewed. In the case of certain projects, additional evaluation and demonstration must be made under the general conformity provisions of state and federal law.

3(b) Ozone Non-Attainment Area. According to the DEQ Air Division, the project location is in an ozone non-attainment area and emission control area for nitrogen oxides (NO_x) and volatile organic compounds (VOC). All precautions are necessary to restrict the emissions of VOC and NO_x.

3(c) Fugitive Dust. During construction activities, ensure that fugitive dust is kept to a minimum by using control methods outlined in 9VAC5-50-60 through 9VAC5-50-120 of the Regulations for the Control and Abatement of Air Pollution. These precautions include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

3(d) Open Burning. If activities include the burning of vegetative debris or construction or demolition material, this activity must meet the requirements under 9VAC5-130-10 through 9VAC5-130-60 and 9VAC5-130-100 of the regulations for open burning, and it may require a permit. The regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The project developer should contact officials with the locality to determine what local requirements, if any, exist.

3(e) Requirement. Fuel-burning equipment (boilers, generators, etc.) or any other air-pollution-emitting equipment may be subject to 9VAC5-80, Article 6, Permits for New and Modified sources.

3(f) Agency Recommendation. Contact DEQ NRO prior to installation or construction and operation of fuel-burning or other air-pollution-emitting equipment.

4. Nonpoint Pollution Control.

4(a) Agency Jurisdiction. The Department of Conservation and Recreation (DCR) Division of Stormwater Management (DSWM) administers the Virginia Erosion and

Sediment Control Law and Regulations (VESCL&R) and Virginia Stormwater Management Law and Regulations (VSWML&R).

4(b) Erosion and Sediment Control, and Stormwater Management. The NPS and its authorized agents conducting regulated land-disturbing activities on private and public lands in the state must comply with the VESCL&R and VSWML&R, including coverage under the General Permit for Discharges of Stormwater from Construction Activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles and related land-disturbance activities that result in the land-disturbance of 2,500 square feet if it is in an area analogous to Chesapeake Bay Preservation Area would be regulated by VESCL&R.

Accordingly, the NPS must prepare and implement an erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The NPS is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites and other mechanisms consistent with agency policy.

4(c) Virginia Stormwater Management Program General Permit for Stormwater Discharges from Construction Activities. According to DCR, the operator or owner of construction activities involving land-disturbing activities equal to or greater than 2,500 square feet in areas designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations, adopted pursuant to the Chesapeake Bay Preservation Act, are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit, and it must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit for Discharges of Stormwater from Construction Activities are available on DCR's website at www.dcr.virginia.gov/soil_&_water/vsmp.shtml.

4(d) Conclusion. Provided the project complies with applicable requirements, it would be consistent with the nonpoint source pollution control enforceable policy of the VCP.

5. Coastal Lands Management and Chesapeake Bay Preservation Act. The EA (page 80) states that the proposed project location is in a Resource Management Area (RMA).

5(a) Agency Jurisdiction. The DCR Division of Stormwater Management – Local Implementation (DSWM –LI) (previously called the Division of Chesapeake Bay Local Assistance) administers the Chesapeake Bay Preservation Act (*Virginia Code* §10.1-2100-10.1-2114) and Chesapeake Bay Preservation Area Designation and Management Regulations (9VAC10-20 *et seq.*).

5(b) Chesapeake Bay Preservation Act. DCR DSWM –LI states that in Prince William County, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and RMAs as designated by the local government:

- RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow.
- All areas of the county not included in the RPA are designated as RMAs.

5(c) Agency Findings. Based upon a review of the EA and Prince William County Chesapeake Bay Preservation Area (CBPA) maps, DCR DSWM –LI states that it appears the proposed new entrance will be located on lands analogous to locally-designated RMA lands and that there will be no impacts to locally-designated RPA lands.

5(d) Chesapeake Ecosystem Unified Plan. The 1998 Federal Agencies' Chesapeake Ecosystem Unified Plan requires the signatories to fully cooperate with local and state governments in carrying out voluntary and mandatory actions to comply with the management of stormwater. In that Plan, the agencies also committed to encouraging construction design that:

- minimizes natural area loss on new and rehabilitated federal facilities;
- adopts low-impact development and best management technologies for stormwater, sediment and erosion control, and reduces impervious surfaces; and
- considers the Conservation Landscaping and Bay-Scapes Guide for Federal Land Managers.

5(e) Chesapeake 2000 Agreement. The Chesapeake 2000 Agreement committed the government agency signatories to a number of sound land use and stormwater quality controls. The signatories additionally committed their agencies to lead by example with respect to controlling nutrient, sediment and chemical contaminant runoff from government properties. In December 2001, the Executive Council of the Chesapeake Bay Program issued Directive No. 01-1, Managing Storm Water on State, Federal and District-owned Lands and Facilities, which includes specific commitments for agencies to lead by example with respect to stormwater control.

5(f) Requirements. DCR DSWM –LI lists the following requirements for the project:

- The applicant is responsible for contacting Prince William County to determine if the proposed project will impact any RPA lands.
- Footpaths such as the one proposed to connect the parking area to Bobcat Ridge Road are conditionally exempt from performance criteria provided any land disturbance greater than 2,500 square feet is consistent with the *Virginia Erosion and Sediment Control Handbook*, Third Edition, 1992.

- NPS is required to be consistent with the provisions of the Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations), as one of the enforceable programs of the VCP.
- Federal agency activities that have reasonably foreseeable effects on any land or water use or natural resource of the coastal zone must be consistent to the maximum extent practicable with the enforceable policies of a coastal state's federally approved VCP. Therefore, federal agency activities on lands located within Tidewater Virginia are required to be consistent with the performance criteria of the Regulations on lands designated CBPAs.
- Public roads and their appurtenant structures are conditionally exempt from the Chesapeake Bay Preservation Area Designation and Management Regulations provided they are constructed in accordance with the following:
 - (i) regulations promulgated pursuant to the Erosion and Sediment Control Law (§ 10.1-560 *et seq.* of the Code of Virginia) and the Stormwater Management Act (§ 10.1-603.1 *et seq.* of the Code of Virginia),
 - (ii) an ESC plan and a stormwater management plan approved by DCR, or
 - (iii) local water quality protection criteria at least as stringent as the above state requirements.
- The exemption of public roads is further conditioned upon the optimization of the road alignment and design, consistent with other applicable requirements, to prevent or otherwise minimize the following:
 - (i) encroachment in the RPAs and
 - (ii) adverse effects on water quality.

5(g) Conclusion. Provided the project complies with applicable requirements, it would be consistent with the coastal lands management enforceable policy of the VCP.

6. Solid and Hazardous Waste Management.

6(a) Agency Jurisdiction. Solid and hazardous wastes in Virginia are regulated by DEQ, the Virginia Waste Management Board and the U.S. Environmental Protection Agency. They administer programs created by the federal Resource Conservation and Recovery Act (RCRA), Comprehensive Environmental Response Compensation and Liability Act, commonly called Superfund, and the Virginia Waste Management Act. DEQ administers regulations established by the Virginia Waste Management Board and reviews permit applications for completeness and conformance with facility standards and financial assurance requirements. All Virginia localities are required, under the Solid Waste Management Planning Regulations, to identify the strategies they will follow on the management of their solid wastes to include items such as facility siting, long-term (20-year) use and alternative programs such as materials recycling and composting.

6(b) Database and Data File Searches. The DEQ Division of Land Protection and Revitalization (DLPR) (formerly called the Waste Division) states that the EA does not address solid and hazardous waste issues. A Geographic Information System (GIS) database search did not reveal any waste sites that would impact or be impacted by the subject site. DLPR performed a cursory review of its data files and states that there may

be waste sites located in close proximity to the project site. Comments from DEQ's Federal Facilities Program are included below.

Formally Used Defense Site (FUDS) (CO3VA0194, FFID VA9799F1667, CHOPAWAMIC TROOP):

- DEQ DLPR states that the EA makes no reference to the Chopawamsic area being a FUDS. There is a remote possibility that the proposed work may uncover unexploded ordinance, munitions or explosive constituents.

RCRA and Hazardous Waste Sites:

- Amoco #1974 – Tanks, 18515 Jefferson Davis Hwy, Triangle, VA 22172. VAD988199220. Contact: Toni Dougherty at 301-625-7858.
- Black Wolf Inc TA Quantico Svc Station, 18434 Jefferson Davis Hwy, Triangle, VA 22172. VAR000007674. Contact: Chris Berry at 703-221-4600.
- Exxon Co USA #23901, 18625 Jefferson Davis Hwy, Triangle, VA 22172. VAD988201059. Contact: Alda S. Pool at 703-656-7709.
- Progressive Printing, 18309 Jefferson Davis Hwy, Triangle, VA 22172. VAD988213690. Contact: Terry Gray at 703-221-8475.
- Quality Auto Repair, 18313 Jefferson Davis Hwy, Triangle, VA 22172. VAD988170825. Contact: Chris Dinapoli at 703-221-1195.
- Sunoco Service Station, 18524 Jefferson Davis Hwy, Triangle, VA 22172. VAD096565965. Contact: Don Gray at 301-341-0100.
- Triangle Amoco, 18515 Jefferson Davis Hwy, Triangle, VA 22172. VAD988210902. Contact: Toni Dougherty at 410-494-3704.
- Triangle Front-End & Frame Service Inc., U.S. Rt. 1, Triangle, VA 22172. VAD988192050. Contact: Benny Brann at 703-221-1577.
- Triangle Sunoco Service Station, Old Fuller Heights Road, Triangle, VA 22172. VAD000793042. Contact: Harry Skinker at 703-373-8251.
- U.S. Prince William Forest Park, 17900 Park Headquarters Road, Triangle, VA 22172. VA4141700936. Contact: Louis Wesselhoft at 703-221-4706.

The following websites may prove helpful in locating additional information as the project progresses:

- www.epa.gov/superfund/sites/cursites/index.htm
- www.epa.gov/enviro/html/rcris/rcris_query_java.html

6(c) Agency Recommendations.

- DEQ encourages all projects, including installation activities, to implement pollution prevention principles, including:
 - the reduction, reuse and recycling of all solid wastes generated; and
 - the minimization and proper handling of generated hazardous wastes.

- Coordinate with the DEQ Federal Facilities Program for additional information prior to land disturbance regarding the above-referenced FUDS.

6(d) Requirement. Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations.

7. Natural Heritage Resources. The EA (page 16) states that protected species as a topic was dismissed from detailed analysis. The EA states that the only federally-listed threatened or endangered species known to occur within the park is the small whorled pogonia (*Isotria medeoloides*), a federally-listed threatened orchid. However, no critical habitat has been identified in the park. The EA indicates that letters were sent to DCR, the Virginia Department of Agriculture and Consumer Services (VDACS) and the U.S. Fish and Wildlife Service (FWS). No response was received from the FWS.

7(a) Agency Jurisdiction. The mission of DCR is to conserve Virginia's natural and recreational resources. The DCR Division of Natural Heritage's (DNH) mission is conserving Virginia's biodiversity through inventory, protection and stewardship. The Virginia Natural Area Preserves Act, 10.1-209 through 217 of the Code of Virginia, was passed in 1989 and codified DCR's powers and duties related to statewide biological inventory: maintaining a statewide database for conservation planning and project review, land protection for the conservation of biodiversity, and the protection and ecological management of natural heritage resources (the habitats of rare, threatened and endangered species, significant natural communities, geologic sites, and other natural features).

7(b) Agency Findings. DCR DNH states that the Biotics Data System documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, DCR DNH does not anticipate that this project will adversely impact these natural heritage resources.

7(c) Threatened and Endangered Plant and Insect Species. The Endangered Plant and Insect Species Act of 1979, Chapter 39, §3.1-102- through 1030 of the Code of Virginia, as amended, authorizes VDACS to conserve, protect and manage endangered species of plants and insects. The VDACS Virginia Endangered Plant and Insect Species Program personnel cooperates with FWS, DCR DNH and other agencies and organizations on the recovery, protection or conservation of listed threatened or endangered species and designated plant and insect species that are rare throughout their worldwide ranges. In those instances where recovery plans, developed by the U.S. Fish and Wildlife Service, are available, adherence to the order and tasks outlined in the plans are followed to the extent possible. VDACS has regulatory authority to conserve rare and endangered plant and insect species through the Virginia Endangered Plant and Insect Species Act.

Under a Memorandum of Agreement established between VDACS and DCR, DCR has the authority to report for VDACS on state-listed plant and insect species.

- DCR DNH finds that the current activity will not affect any documented state-listed plant and insect species.
- VDACS states that the federally-listed and state-listed *Isotria medeoloides* is known to occur in the region. Responses from federal and state agencies regarding location of this plant and critical habitat that would support populations in the vicinity of the project were not available in the EA. However, based on the information in VDACS' database, no threatened or endangered plant and insect species are documented to occur in the vicinity of the project area. VDACS does not anticipate that this project will have a significant adverse effect as it relates to VDACS' responsibilities for the protection of listed endangered and threatened plant and insect species.

7(d) State Natural Area Preserves. DCR's files do not indicate the presence of any State Natural Area Preserves under the agency's jurisdiction.

7(e) Agency Recommendation. Since new and updated information is continually added to the Biotics Data System, contact DCR DNH for updated information if a significant amount of time passes before a project discussed in the plan is implemented.

8. Wildlife Resources. The EA (pages 13 and 14) states that wildlife was a topic dismissed from further analysis based on the low potential for adverse impacts. According to the EA, the maximum area of disturbance from the parking lot footprint would be 0.5 acres, and the adjacent habitat includes more than 1,000 acres of relatively undisturbed forest. Any displaced terrestrial wildlife species would be expected to mobilize to alternate habitat areas within the park.

8(a) Agency Jurisdiction. The Department of Game and Inland Fisheries (DGIF), as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects (Virginia Code Title 29.1). DGIF is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 *et seq.*) and provides environmental analysis of projects or permit applications coordinated through DEQ and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce or compensate for those impacts.

8(b) Agency Comments. DGIF did not respond to DEQ's request for comments.

8(c) Agency Recommendation. For additional information on wildlife resources, visit the DGIF website (www.dgif.virginia.gov) or contact DGIF (Amy Ewing at Amy.Ewing@dgif.virginia.gov).

9. Historic Architectural Resources.

9(a) Agency Jurisdiction. DHR conducts reviews of projects to determine their effect on historic structures or cultural resources under its jurisdiction. DHR, as the designated State's Historic Preservation Office, ensures that federal actions comply with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation at 36 CFR Part 800. The preservation act requires federal agencies to consider the effects of federal projects on properties that are listed or eligible for listing on the National Register of Historic Places. Section 106 also applies if there are any federal involvements, such as licenses, permits, approvals or funding. DHR also provides comments to DEQ through the state environmental impact report review process.

9(b) Agency Findings. Based upon the documentation provided, DHR states that it concurs with the NPS that the proposed project will not adversely affect historic properties. No archaeological sites were identified during the archeological survey, and DHR agrees with the consultant's recommendation that no further archaeological investigations are warranted in connection with this project. In addition, DHR agrees with the NPS' selection of Alternative 2 as the preferred option. The document appears thorough in its consideration of cultural resources. In particular, DHR notes the discussion of impacts to Bobcat Ridge Road, which is considered a feature of the potential cultural landscape. The proposed mitigation measures appropriately include the treatment of post-review archaeological discoveries as well as measures to minimize effects on Bobcat Ridge Road by avoiding cutting, scraping, grading or other excavation of the roadbed, controlling erosion by adding a protective layer of mulch or gravel as needed and limiting use of the roadbed to foot traffic (with the exception of emergency vehicles).

Contact DHR (Ethel Eaton at 804-482-6088 or Ethel.Eaton@dhr.virginia.gov) for addition information or assistance.

10. Public Water Supply.

10(a) Agency Jurisdiction. The Virginia Department of Health (VDH) Office of Drinking Water (ODW) reviews projects for the potential to impact public drinking water sources (groundwater wells, springs and surface water intakes).

10(b) Agency Findings. The VDH ODW states that there are no apparent impacts to public drinking water sources due to this project. No groundwater wells are within a 1-mile radius of the project site. The Quantico Marine Base Mainside's Breckenridge Reservoir surface water intake is located approximately 2.5 miles downstream of the project site. The project falls within Zone 1 (up to 5 miles into the watershed) of the Quantico intake but does not fall within Zone 2 (greater than 5 miles into the watershed) of any public surface water sources.

10(c) Agency Recommendation. VDH ODW recommends coordination with the local waterworks operator during construction.

10(d) Requirements. Installation of new water lines and appurtenances must comply with the state's waterworks regulations. VDH administers both federal and state laws governing waterworks operation. Also, VDH states that potential impacts to public water distribution systems must be verified by the local utility.

11. Non-discharging Sewer Systems. NPS (page 1) proposes to install vault toilets at the project site.

11(a) Agency Jurisdiction. VDH has authority for non-discharging systems such as septic tanks and drain fields. This authority is contained in the Sewage Handling and Disposal Regulations (12VAC5-610-10 *et seq.*).

11(b) Agency Comments. Contact the Prince William Health Department regarding applicable sewage regulations and requirements for the vault toilets.

12. Tree Protection.

12(a) Agency Jurisdiction. The mission of the Virginia Department of Forestry (DOF) is to protect and develop healthy, sustainable forest resources for Virginians. DOF was established in 1914 to prevent and suppress forest fires and reforest bare lands. Since the Department's inception, it has grown and evolved to encompass other protection and management duties including: protecting Virginia's forests from wildfire, protecting Virginia's waters, managing and conserving Virginia's forests, managing state-owned lands and nurseries, and managing regulated incentive programs for forest landowners.

12(b) Agency Finding. DOF finds that this project will not have a significant impact to the overall forest resources of the Commonwealth. Although the plan requires the removal of up to 189 trees on 0.5 acres, the species that are being removed are common in the surrounding forest.

12(c) Recommendations. DOF has the following recommendations:

- Ensure that care is taken to protect the surrounding forest resource.
- Parking and stacking of heavy equipment and construction materials near trees can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. The protection measures suggested above should be used for parking and stacking as well as for moving of equipment and materials.
- Any stock piling of soil should take place away from trees. Piling soil at a tree stem can kill the root system of the tree.
- Soil stockpiles should be covered, as well, to prevent soil erosion and fugitive dust.

Questions pertaining to protection of trees and forest resources may be addressed to DOF (Tom Harlan, Forest Resource Management Division, at 434-220-9064 or tom.harlan@dof.virginia.gov).

13. Transportation Impacts.

13(a) Agency Jurisdiction. The Virginia Department of Transportation (VDOT) provides comments pertaining to potential impacts to existing and future transportation systems.

13(b) Agency Comments. VDOT did not respond to DEQ's request for comments.

13(c) Agency Recommendation. For information on transportation impacts, contact VDOT (Chip Ray at Alfred.Ray@vdot.virginia.gov or Jim Cromwell at James.Cromwell@vdot.virginia.gov).

14. Local and Regional Comments.

14(a) Jurisdiction. In accordance with the Code of Virginia, Section 15.2-4207, planning district commissions encourage and facilitate local government cooperation and state-local cooperation in addressing, on a regional basis, problems of greater than local significance. The cooperation resulting from this is intended to facilitate the recognition and analysis of regional opportunities and take account of regional influences in planning and implementing public policies and services. Planning district commissions promote the orderly and efficient development of the physical, social and economic elements of the districts by planning, and encouraging and assisting localities to plan for the future.

14(b) Regional Comments. The Northern Virginia Regional Commission (NVRC) states that the proposed development will occur within the borders of the Occoquan Reservoir watershed. This reservoir serves as the drinking water source for more than 800,000 people in the Northern Virginia area and is an integral component of the Potomac River and Chesapeake Bay drainage basins. Special attention should be given to erosion and sediment controls during construction.

NVRC states that Prince William County has enacted a jurisdiction-wide Chesapeake Bay RMA designation, which requires that all development results in a no net increase standard for phosphorus loadings, based on the jurisdiction's average imperviousness. The *Northern Virginia BMP Handbook* contains calculation procedures. NVRC also suggests that where possible opportunities for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities should be explored. NVRC's *Guidebook for Maintaining BMPs in Northern Virginia* is available for use.

14(c) Local Comments.

- Stafford County did not respond to DEQ's request for comments.
- Prince William County states it has reviewed the proposal. The existing trail entrance (on Breckenridge Road) involves lands owned by Quantico and is being closed for security reasons. The proposed new entrance (from Joplin Road) involves minimal site clearance (less than 0.15 acre). No adverse impacts to Prince William County are anticipated.

14(d) Local Requirement. The NVRC includes the following requirement in its comments:

- For post-construction stormwater quality management, NPS must adhere to the post-development water quality requirements in the Virginia Stormwater Management Regulations (VR 215-02-00 Par IV and Section 2.3).

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the Coastal Zone Management Act of 1972, as amended, federal activities located inside or outside of Virginia's designated coastal management area that can have reasonably foreseeable effects on coastal resources or coastal uses must, to the maximum extent practicable, be implemented in a manner consistent with the VCP. The VCP consists of a network of programs administered by several agencies. DEQ coordinates the review of FCDs with agencies administering the enforceable and advisory policies of the VCP.

PUBLIC PARTICIPATION

In accordance with 15 CFR §930.2, the public was invited to participate in the Commonwealth's review of the FCD. A public notice of this proposed action was published on the DEQ website from December 22, 2011 to January 20, 2012. No public comments were received in response to the notice.

CONSISTENCY CONCURRENCE

Based on the information provided in the draft EA and FCD, and the comments of agencies administering the enforceable policies of the VCP, DEQ concurs that the proposed activity is consistent with the VCP and has no objection to the implementation of the proposed action provided that NPS ensures that the proposed action is consistent with the enforceable policies and that this project is constructed and operated in accordance with all applicable federal, state and local laws and regulations. However, there may be other applicable state and federal requirements that are not included in the state's concurrence with the FCD.

REGULATORY AND COORDINATION NEEDS FOR FUTURE PROJECTS

1. Water Quality and Wetlands Management. NPS should ensure compliance with the Virginia Water Protection Permit (VWPP) requirements pursuant to Virginia Code §62.1-44.15:20 *et seq.* and Virginia regulations 9VAC25-210-10 *et seq.* If the project changes to include impacts to waters or wetlands, coordinate with DEQ NRO (Trisha Beasley, VWPP Program Manager, at Trisha.Beasley@deq.virginia.gov) regarding potential VWPP requirements.

2. Subaqueous Lands Management. The VMRC regulates encroachments in, on or over state-owned subaqueous beds as well as tidal wetlands pursuant to § 28.2-1200 through 1400 of the *Code of Virginia*. If the project changes and includes impacts to subaqueous lands, coordinate with VMRC (Juliette Giordano at 757-247-8028) regarding the possible submission of a JPA.

3. Erosion and Sediment Control, and Stormwater Management.

3(a) Erosion and Sediment Control Project-Specific Plans. If the project disturbs 2,500 square feet or more of land analogous to a Chesapeake Bay Protection Area, an ESC plan should be prepared and implemented to ensure compliance with state law and regulations (VESCL §10.1-560, §10.1-564; VESCR §4VAC50-30-30). NPS is ultimately responsible for achieving project compliance through oversight of on-site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. The ESC plan should be submitted to DCR's Warrenton Regional Office at 540-347-6420 for compliance review.

3(b) VSMP General Permit. If the project disturbs equal to or greater than 2,500 square feet in areas designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act, register for coverage under the Virginia Stormwater Management Program (VSMP) General Permit for Discharges of Stormwater from Construction Activities and develop a project-specific SWPPP (Virginia Stormwater Management Law §10.1-603.1 *et seq.*; VSMP Permit Regulations §4VAC40-50 *et seq.*). Specific questions regarding the VSMP General Permit for Construction Activities requirements should be directed to DCR (Holly Sepety at 804-225-2613).

4. Solid and Hazardous Wastes. All solid waste, hazardous waste and hazardous materials must be managed in accordance with all applicable federal, state and local environmental regulations. Some of the applicable state laws and regulations are:

- Virginia Waste Management Act (Code of Virginia Section 10.1-1400 *et seq.*);
- Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC20-60);
- Virginia Solid Waste Management Regulations (VSWMR) (9VAC20-81);
- Virginia Regulations for the Transportation of Hazardous Materials (9VAC20-110).

Some of the applicable federal laws and regulations are:

- Resource Conservation and Recovery Act (RCRA) (42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations); and
- U.S. Department of Transportation Rules for Transportation of Hazardous materials (49 Code of Federal Regulations Part 107).

4(a) Coordination. DEQ DLPR states that there is a remote possibility that the proposed work may uncover unexploded ordinance, munitions or explosive constituents. Contact DEQ Federal Facilities Program (Karen Sismour 804-698-4421) for additional information prior to land disturbance.

5. Air Quality Regulations. The following state air pollution regulations may apply during construction activities:

- fugitive dust and emissions control (9VAC5-50-60 *et seq.*); and
- open burning restrictions (9VAC5-130 *et seq.*).

For information on any local requirements pertaining to open burning, contact officials with the appropriate locality.

5(a) Fuel-burning Equipment. Contact DEQ NRO (Terry H. Darton at 703-583-3845 or Terry.Darton@deq.virginia.gov) prior to installation or construction and operation of fuel-burning or other air-pollution-emitting equipment.

6. Natural Heritage Resources. Contact the DCR DNH at (804) 371-2708 if a significant amount of time passes before the plan is finalized since new and updated information is continually added to the Biotics Data System.

7. Chesapeake Bay Preservation Areas. The proposed project must be conducted in a manner consistent with the requirements of the Chesapeake Bay Preservation Act (Virginia Code §§ 10.1-2100 through 10.1-2114) and Chesapeake Bay Preservation Area Designation and Management Regulations (Virginia Code § 9VAC10-20-10 *et seq.*). The project is subject to the general performance criteria found in 9VAC10-20-120, the Erosion and Sediment Control Law (§ 10.1-560 *et seq.* of the Code of Virginia), the stormwater management criteria consistent with water quality protection provisions of the Virginia Stormwater Management Regulations (4VAC50-60), and the provisions of the local Bay Act Ordinance. To ensure consistency with the Chesapeake Bay Preservation Act and Regulations, coordinate with DCR (Joan Salvati at Joan.Salvati@dcv.virginia.gov) as applicable. In addition, DCR DSWM –LI identifies the following requirements and conditions for the proposed project:

- Public roads and their appurtenant structures are conditionally exempt from the *Chesapeake Bay Preservation Area Designation and Management Regulations* provided they are constructed in accordance with the following:

- (i) regulations promulgated pursuant to the Erosion and Sediment Control Law (§ 10.1-560 *et seq.* of the Code of Virginia) and the Stormwater Management Act (§ 10.1-603.1 *et seq.* of the Code of Virginia),
 - (ii) an erosion and sediment control plan and a stormwater management plan approved by DCR, or
 - (iii) local water quality protection criteria at least as stringent as the above state requirements.
- The exemption of public roads is further conditioned upon the optimization of the road alignment and design, consistent with other applicable requirements, to prevent or otherwise minimize the following:
 - (i) encroachment in the RPAs and
 - (ii) adverse effects on water quality.
- The applicant is responsible for contacting Prince William County (703-792-6830) to determine if the proposed project will impact any RPA lands.
- Footpaths such as the one proposed to connect the parking area to Bobcat Ridge Road are conditionally exempt from the previously mentioned performance criteria provided any land disturbance greater than 2,500 square feet is consistent with the *Virginia Erosion and Sediment Control Handbook*, Third Edition, 1992.

8. Water Supply.

- VDH administers both federal and state laws governing waterworks operation.
- Installation of new water lines and appurtenances must comply with the state's waterworks regulations.
- Potential impacts to public water distribution systems must be verified by the local utility, as applicable.
- Coordinate with the local waterworks operator (Danny Gilley, Quantico Water Treatment Plant Supervisor, at 703-784-3274) during construction activities.

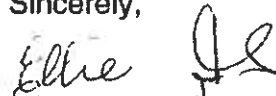
9. Non-Discharging Sewage Systems.

- VDH has authority for non-discharging systems pursuant to the Sewage Handling and Disposal Regulations (12VAC5-610-10 *et seq.*).
- Contact the Prince William Health Department (703-792-6310) regarding applicable sewage regulations and requirements for the vault toilets.

CONCLUSION

Thank you for the opportunity to review the draft EA and FCD. Detailed comments of reviewing agencies are attached for your review. Please contact me at (804) 698-4325 or Julia Wellman at (804) 698-4326 for clarification of these comments.

Sincerely,



Ellie L. Irons, Program Manager
Environmental Impact Review

Enclosures

cc: Mark G. Gibb, NVRC
Melissa S. Peacor, Prince William County

ec: Amy Ewing, DGIF
Keith Tignor, VDACS
Robbie Rhur, DCR
Barry Matthews, DHR
Steve Coe, DLPR
Kotur Narasimhan, DEQ Air
David Hartshorn, DEQ
Roger Kirchen, DHR
Ethel Eaton, DHR
Juliette Giordano, VMRC
Tom Harlan, DOF
Alfred Ray/James Cromwell, VDOT

**DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR PROGRAM COORDINATION**

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Julia H. Wellman

DEQ - OEIA PROJECT NUMBER: 11 - 208F

PROJECT TYPE: ☐ STATE EA / EIR ☒ FEDERAL EA / EIS ☐ SCC

X CONSISTENCY DETERMINATION

PROJECT TITLE: NEW ENTRANCE TO CHOPAWAMSIK BACKCOUNTRY AREA

PROJECT SPONSOR: DOI / NATIONAL PARK SERVICE

PROJECT LOCATION: **X OZONE NON ATTAINMENT AND
EMISSION CONTROL AREA FOR NOX & VOC**

REGULATORY REQUIREMENTS MAY BE APPLICABLE TO: ☒ CONSTRUCTION
☐ OPERATION

STATE AIR POLLUTION CONTROL BOARD REGULATIONS THAT MAY APPLY:

1. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 E - STAGE I
2. ☐ 9 VAC 5-40-5200 C & 9 VAC 5-40-5220 F - STAGE II Vapor Recovery
3. ☐ 9 VAC 5-40-5490 et seq. - Asphalt Paving operations
4. ☒ 9 VAC 5-130 et seq. - Open Burning
5. ☒ 9 VAC 5-50-60 et seq. Fugitive Dust Emissions
6. ☐ 9 VAC 5-50-130 et seq. - Odorous Emissions; Applicable to _____
7. ☐ 9 VAC 5-50-160 et seq. - Standards of Performance for Toxic Pollutants
8. ☐ 9 VAC 5-50-400 Subpart _____, Standards of Performance for New Stationary Sources, designates standards of performance for the _____
9. ☐ 9 VAC 5-80-10 et seq. of the regulations - Permits for Stationary Sources
10. ☐ 9 VAC 5-80-1700 et seq. Of the regulations - Major or Modified Sources located in PSD areas. This rule may be applicable to the _____
11. ☐ 9 VAC 5-80-2000 et seq. of the regulations - New and modified sources located in non-attainment areas
12. ☐ 9 VAC 5-80-800 et seq. Of the regulations - Operating Permits and exemptions. This rule may be applicable to _____

COMMENTS SPECIFIC TO THE PROJECT:

All precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x).



(Kotur S. Narasimhan)
Office of Air Data Analysis

DATE: December 22, 2011



MEMORANDUM

TO: Julia Wellman, Environmental Program Planner

FROM: *G. Stephen "Steve" Coe*
Steve Coe, Division of Land Protection & Revitalization Review Coordinator

DATE: January 20, 2012

COPIES: Sanjay Thirunagari, Division of Land Protection & Revitalization Review Manager; file

SUBJECT: Environmental Impact Report: 11-208F

The Division of Land Protection & Revitalization has completed its review of the Environmental Impact report for the New Entrance to Chopawamsic Backcountry Area project for the National Park Service, Triangle, Virginia 22172. The project consists of a proposed new entrance to the Chopawamsic Backcountry Area from State Rt 619 (Joplin Road), an 0.5 acre gravel parking lot and vault toilet system as well as the cleanup of Bobcat Ridge Road within the park. The entrance would be near milepost 20 on Joplin Road. We have the following comments concerning the waste issues associated with this project:

Neither solid and nor hazardous waste issues were addressed in the report. The report did not indicate a search of waste-related data bases. A GIS database search did not reveal any waste sites that would impact or be impacted by the subject sites. The Division of Land Protection & Revitalization staff performed a cursory review of its data files and it appears that there may be waste sites located in close proximity to the project site. DEQ's Federal Facilities Program was contacted for a review of this submittal, and the staff comments are included.

CERCLIS – none
Solid Waste – none
VRP – none

FUDS – CO3VA0194, FFID VA9799F1667, CHOPAWAMIC TROOP TRG S

The report makes no reference to this area being a Formerly Used Defense Site. There is a remote possibility that the work may uncover Unexploded Ordnance or Munitions or Explosive Constituents. Any questions related to this topic should be addressed to Ms. Karen Sismour with DEQ's Central Office at 804-698-4421.

RCRA/HW – 10 sites identified for zip code 22172

- 1) Amoco #1974 – Tanks, 18515 Jefferson Davis Hwy, Triangle, VA 22172. VAD988199220.
Contact: Toni Dougherty at 301-625-7858.

- 2) Black Wolf Inc TA Quantico Svc Station, 18434 Jefferson Davis Hwy, Triangle, VA 22172. VAR000007674. Contact: Chris Berry at 703-221-4600.
- 3) Exxon Co USA #23901, 18625 Jefferson Davis Hwy, Triangle, VA 22172. VAD988201059. Contact: Alda S. Pool at 703-656-7709.
- 4) Progressive Printing, 18309 Jefferson Davis Hwy, Triangle, VA 22172. VAD988213690. Contact: Terry Gray at 703-221-8475.
- 5) Quality Auto Repair, 18313 Jefferson Davis Hwy, Triangle, VA 22172. VAD988170825. Contact: Chris Dinapoli at 703-221-1195.
- 6) Sunoco Service Station, 18524 Jefferson Davis Hwy, Triangle, VA 22172. VAD096565965. Contact: Don Gray at 301-341-0100.
- 7) Triangle Amoco, 18515 Jefferson Davis Hwy, Triangle, VA 22172. VAD988210902. Contact: Toni Dougherty at 410-494-3704.
- 8) Triangle Front-End & Frame Service Inc., U.S. Rt 1, Triangle, VA 22172. VAD988192050. Contact: Benny Brann at 703-221-1577.
- 9) Triangle Sunoco Service Station, Old Fuller Heights Road, Triangle, VA 22172. VAD000793042. Contact: Harry Skinker at 703-373-8251.
- 10) U.S. Prince William Forest Park, 17900 Park Headquarters Road, Triangle, VA 22172. VA4141700936. Contact: Louis Wesselhoft at 703-221-4706.

The following websites may prove helpful in locating additional information as the project progresses: <http://www.epa.gov/superfund/sites/cursites/index.htm> or http://www.epa.gov/enviro/html/rcris/rcris_query_java.html.

GENERAL COMMENTS:

Any soil that is suspected of contamination or wastes that are generated during construction-related activities must be tested and disposed of in accordance with applicable Federal, State, and local laws and regulations. Some of the applicable state laws and regulations are: Virginia Waste Management Act, Code of Virginia Section 10.1-1400 *et seq.*; Virginia Hazardous Waste Management Regulations (VHWMR) (9VAC 20-60); Virginia Solid Waste Management Regulations (VSWMR) (9VAC 20-80); Virginia Regulations for the Transportation of Hazardous Materials (9VAC 20-110). Some of the applicable Federal laws and regulations are: the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 *et seq.*, and the applicable regulations contained in Title 40 of the Code of Federal Regulations; and the U.S. Department of Transportation Rules for Transportation of Hazardous materials, 49 CFR Part 107.

Also, all structures being demolished/renovated/ removed should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to demolition. If ACM or LBP are found, in addition to the federal waste-related regulations mentioned above, State regulations 9VAC 20-80-640 for ACM and 9VAC 20-60-261 for LBP must be followed. Questions on these topics may be directed to Kathryn Perszyk at 703-583-3856.

Please note that DEQ encourages all construction projects and facilities to implement pollution prevention principles, including the reduction, reuse, and recycling of all solid wastes generated. All generation of hazardous wastes should be minimized and handled appropriately.

If you have any questions or need further information, please contact Steve Coe at (804) 698-4029.

Wellman, Julia (DEQ)

From: Hartshorn, David (DEQ)
Sent: Tuesday, January 17, 2012 11:07 AM
To: Wellman, Julia (DEQ)
Cc: Hartshorn, David (DEQ)
Subject: EA/CD #11-208F

NRO comments regarding the New Entrance to Chopawamsic Backcountry Area, DOI/National Park Service are as follows:

Division of Land Protection and Revitalization: Any solid and/or hazardous waste encountered and/or generated during demolition, and construction and operation of this facility shall be disposed of following applicable federal, state, and county regulations.

Air Compliance/Permitting: The project manager is reminded that during the demolition and construction phases of this project, that the project is subject to the Fugitive Dust/Fugitive Emissions Rule 9 VAC 5-50-60 through 9 VAC 5-50-120. In addition, should the project install fuel burning equipment (Boilers, Generators, etc...), or any other air pollution emitting equipment, the project may be subject to 9 VAC 5-80, Article 6, Permits for New and Modified sources and as such the project manager should contact the Air Permit Manager DEQ-NRO prior to purchase, installation, or construction and operation, of fuel burning or other air pollution emitting equipment for a permitting determination.

Virginia Water Protection Permit (VWPP) Program - A VWP permit from DEQ may be required should impacts to surface waters be necessary. DEQ VWP staff recommends that the project avoid and minimize impacts to the surface waters to the maximum extent practicable. Prior to commencing any activities that would impact and/or disrupt wetlands and/or surface waters of the Commonwealth, the project manager is to obtain all required and necessary permits from the appropriate regulatory agencies.

R. David Hartshorn
Regional Air Compliance Manager
DEQ-NRO

13901 Crown Court
Woodbridge, VA 22193
(703) 583-3895
fax (703) 583-3821

e-mail - R.David.Hartshorn@deq.virginia.gov

This electronic mail (including any attachments) may contain information that is privileged, confidential, and/or otherwise protected from disclosure to anyone other than its intended recipient(s). Any dissemination or use of this electronic email or its contents (including any attachments) by persons other than the intended recipient(s) is strictly prohibited.



COMMONWEALTH of VIRGINIA

Marine Resources Commission

2600 Washington Avenue

Third Floor

Newport News, Virginia 23607

Douglas W. Domenech
Secretary of Natural Resources

Steven G. Bowman
Commissioner

December 27, 2011

Ms. Julia H. Wellman
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

RECEIVED

JAN 04 2012

DEQ-Office of Environmental
Impact Review

Re: Project #11-208F
New Entrance to Chopawamsic
Backcountry Area Proposal
Request for Comments

Dear Ms. Wellman:

We have reviewed the above-referenced proposal concerning the construction of a new entrance to the Chopawamsic Backcountry Area of the Prince William Forest Park in Prince William County.

Based upon the information provided at this stage of planning, it does not appear that any work is proposed within the jurisdiction of the Marine Resources Commission. However, please be advised that the Commission, pursuant to §28.2-1200 et seq of the Code of Virginia, has jurisdiction over any encroachments in, on, or over the beds of the bays, ocean, rivers, streams, or creeks which are the property of the Commonwealth. Accordingly, if any portion of the subject project involves any encroachments channelward of ordinary high water along natural rivers and streams above the fall line or mean low water below the fall line, a permit may be required from our agency. Any jurisdictional impacts will be reviewed by VMRC during the Joint Permit Application process.

Thank you for the opportunity to comment on this project. If we may be of further assistance, please do not hesitate to contact us.

Sincerely,

Juliette Giordano
Environmental Engineer

JG/mos
HM

An Agency of the Natural Resources Secretariat

www.mrc.virginia.gov

Telephone (757) 247-2200 (757) 247-2292 V TDD Information and Emergency Hotline 1-800-541-4646 V/TDD

Douglas W. Domenech
Secretary of Natural Resources



David A. Johnson
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

203 Governor Street
Richmond, Virginia 23219-2010
(804) 786-1712

MEMORANDUM

DATE: January 18, 2012
TO: Julia Wellman, DEQ
FROM: Roberta Rhur, Environmental Impact Review Coordinator
SUBJECT: DEQ 11-208F, NPS New Entrance to Chopawamsic Backcountry Area

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

Biotics documents the presence of natural heritage resources in the project area. However, due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Shirl Dressler at (804) 367-6913.

Division of Stormwater Management

Chesapeake Bay Local Assistance:

In Prince William County, the areas protected by the *Chesapeake Bay Preservation Act*, as locally implemented, require conformance with performance criteria. These areas include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs) as designated by the local government. RPAs include tidal wetlands, certain non-tidal wetlands and tidal shores. RPAs also include a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. All areas of the County not included in the RPA are designated as RMAs.

The National Park Service is required to be consistent with the provisions of the Chesapeake Bay Preservation Area Designation and Management Regulations (Regulations), as one of the enforceable programs of Virginia's Coastal Resources Management Program (VCRMP). Federal agency activities that have reasonably foreseeable effects on any land or water use or natural resource of the coastal zone must be consistent to the maximum extent practicable with the enforceable policies of a coastal State's federally approved Coastal Management Program (CMP). Therefore, Federal agency activities on lands located within Tidewater Virginia are required to be consistent with the performance criteria of the Regulations on lands designated Chesapeake Bay Preservation Areas.

Public roads and their appurtenant structures are conditionally exempt from the *Chesapeake Bay Preservation Area Designation and Management Regulations* provided they are constructed in accordance with (i) regulations promulgated pursuant to the Erosion and Sediment Control Law (§ 10.1-560 et seq. of the Code of Virginia) and the Stormwater Management Act (§ 10.1-603.1 et seq. of the Code of Virginia), (ii) an erosion and sediment control plan and a stormwater management plan approved by the Virginia Department of Conservation and Recreation, or (iii) local water quality protection criteria at least as stringent as the above state requirements. The exemption of public roads is further conditioned upon the optimization of the road alignment and design, consistent with other applicable requirements, to prevent or otherwise minimize (i) encroachment in the Resource Protection Areas and (ii) adverse effects on water quality.

Based upon a review of the materials submitted and Prince William County CBPA maps, it appears the proposed new entrance will be located on lands analogous to locally-designated RMA lands and that there will be no impacts to locally-designated RPA lands. It is important to note however that the applicant is responsible for contacting Prince William County staff to determine if the proposed project will impact any RPA lands. Footpaths such as the one proposed to connect the parking area to Bobcat Ridge Road are conditionally exempt from the previously mentioned performance criteria provided any land disturbance greater than 2,500 square feet is consistent with the *Virginia Erosion and Sediment Control Handbook*, Third Edition, 1992.

Provided adherence to the above requirements, the project would be consistent with the Chesapeake Bay Preservation Act and Regulations.

Stormwater Management:

The applicant and their authorized agents conducting regulated land disturbing activities on private and public lands in the state must comply with the Virginia Erosion and Sediment Control Law and Regulations (VESCL&R), Virginia Stormwater Management Law and Regulations including coverage under the general permit for stormwater discharge from construction activities, and other applicable federal nonpoint source pollution mandates (e.g. Clean Water Act-Section 313, Federal Consistency under the Coastal Zone Management Act). Clearing and grading activities, installation of staging areas, parking lots, roads, buildings, utilities, borrow areas, soil stockpiles, and related land-disturbance

activities that result in the land-disturbance of greater than 2,500 square feet would be regulated by VESCL&R. Accordingly, the applicant must prepare and implement erosion and sediment control (ESC) plan to ensure compliance with state law and regulations. The ESC plan is submitted to the DCR Regional Office that serves the area where the project is located for review for compliance. The applicant is ultimately responsible for achieving project compliance through oversight of on site contractors, regular field inspection, prompt action against non-compliant sites, and other mechanisms consistent with agency policy. [Reference: VESCL §10.1-567;].

General Permit for Discharges of Stormwater from Construction Activities in CBPA:

The operator or owner of construction activities involving land disturbing activities equal to or greater than 2,500 square feet in areas designated as subject to the Chesapeake Bay Preservation Area Designation and Management Regulations adopted pursuant to the Chesapeake Bay Preservation Act are required to register for coverage under the General Permit for Discharges of Stormwater from Construction Activities and develop a project specific stormwater pollution prevention plan (SWPPP). The SWPPP must be prepared prior to submission of the registration statement for coverage under the general permit and the SWPPP must address water quality and quantity in accordance with the Virginia Stormwater Management Program (VSMP) Permit Regulations. General information and registration forms for the General Permit are available on DCR's website at

http://www.dcr.virginia.gov/soil_and_water/index.shtml

[Reference: Virginia Stormwater Management Law Act §10.1-603.1 et seq.; VSMP Permit Regulations §4VAC-50 et seq.]

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

If you cannot meet the deadline, please notify JULIA H. WELLMAN at 804/698-4326 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MS. JULIA H. WELLMAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319
Julia.Wellman@deq.virginia.gov

RECEIVED

DEC 22 2011

DEQ-Office of Environmental
Impact Review


JULIA H. WELLMAN
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

The federal and state listed *Isotria medeoloides* is known to occur in the region. Responses from federal and state agencies regarding location of this plant and critical habitat that would support populations in the vicinity of the project were not available in the applicant's documentation. Based on information in our database, no T/E plant and insect species are documented to occur in the vicinity of the project area. At this time, we do not anticipate this project will have significant adverse affect as it relates to VDACS' responsibilities for the preservation of agricultural lands and the protection of listed endangered and threatened plant and insect species.

(signed)  (date) _____

(title) _____ (Keith R. Tignor) December 19, 2011

(agency) Endangered Species Coordinator

Wellman, Julia (DEQ)

From: Forsgren, Diedre (VDH)
Sent: Thursday, January 19, 2012 4:17 PM
To: Wellman, Julia (DEQ)
Subject: (11-208F) EA: New Entrance to Chopawamsic Backcountry Area

DEQ Project #: 11-208F
Name: New Entrance to Chopawamsic Backcountry Area
Sponsor: DOI/National Park Service
Location: Prince William & Stafford Counties

VDH – Office of Drinking Water has reviewed DEQ Project Number 11-208F. Below are our comments as they relate to proximity to **public drinking water** sources (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

No groundwater wells are within a 1 mile radius of the project site.

The Quantico Marine Base Mainside/Breckenridge Reservoir surface water intake is located approximately two and a half miles downstream of the project site.

Project falls within Zone 1 (up to 5 miles into the watershed) of the Quantico intake, but does not fall within Zone 2 (greater than 5 miles into the watershed) of any public surface water sources.

There are no apparent impacts to public drinking water sources due to this project.

The Office of Drinking Water suggests coordination with the waterworks operator during construction.

Diedre Forsgren

Office Services Specialist
VIRGINIA DEPARTMENT OF HEALTH
Office of Drinking Water, Room 622-A
109 Governor Street
Richmond, VA 23219
Phone: (804) 864-7241
email: diedre.forsgren@vdh.virginia.gov

Wellman, Julia (DEQ)

From: Forsgren, Diedre (VDH)
Sent: Tuesday, February 07, 2012 3:20 PM
To: Wellman, Julia (DEQ)
Subject: RE: (11-208F) EA: New Entrance to Chopawamsic Backcountry Area

Julia:

The agency jurisdiction is correct; the last four digits of the phone number need to be changed to 6310.

The waterworks operator contact information is as follows:

| | | | | |
|------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|--------------|--|
| Admin Contact | GREEK, PATRICIA Z. UTILITY ENGINEER MCB QUANTICO Public Works Branch P.O. Box 327 QUANTICO, VA 22134 | patricia.greek@usmc.mil | | |
| | | BUS - Business | 703-432-2466 | |
| | | FAX - Facsimile | 703-432-0509 | |
| | | | | |
| Admin Contact | MELENDEZ, CARMELO COMMANDER MARINE CORPS BASE QUANTICO QUANTICO MARINE CORPS BASE 3250 CATLIN AVENUE, SUITE 235 QUANTICO, VA 22134-5001 | | | |
| | | BUS - Business | 703-784-2557 | |
| | | | | |
| Admin Contact | SPERLAZZA, THOMAS E. UTILS GENERAL FOREMA QUANTICO MARINE CORPS BASE MAINTENANCE BRANCH UTILITIES B-041-7 3250 CATLIN ROAD, SUITE 235 QUANTICO, VA 22134-5001 | thomas.sperlazza@usmc.mil | | |
| | | BUS - Business | 703-432-0698 | |
| | | FAX - Facsimile | 703-784-2980 | |
| | | | | |
| Designated Operator in Charge 1901000663- 0211 | GILLEY, DANNY SUPERVISOR - WTP QUANTICO MCB FLSS-UTILITIES SEC. B0041-7 3252 BARNETT AVE. QUANTICO, VA 22134-5001 | danny.gilley1@usmc.mil | | |
| | | BUS - Business | 703-784-3274 | |
| | | FAX - Facsimile | 703-784-2980 | |
| | | MOB - Mobile | 571-437-3585 | |
| | | EMERG - Emergency | 703-784-2698 | |

Let me know if this answers your questions.

Diedre Forsgren

From: Wellman, Julia (DEQ)
Sent: Tuesday, February 07, 2012 2:30 PM
To: Forsgren, Diedre (VDH)
Subject: RE: (11-208F) EA: New Entrance to Chopawamsic Backcountry Area

Will you please verify if this is correct?

9. Non-discharging Sewer Systems.

9(a) Agency Jurisdiction. VDH has authority for non-discharging systems such as septic tanks and drain fields. This authority is contained in the Sewage Handling and Disposal Regulations (12VAC5-610-10 *et seq.*).

9(b) Agency Comments. Contact Prince William Health Department (703-792-**6310**) regarding applicable sewage regulations and requirements for the vault toilets.

Also, do you have contact information for the waterworks operator?

Julia Wellman
Environmental Impact Review Coordinator
Virginia Department of Environmental Quality
Office of Environmental Impact Review
PO Box 1105
Richmond, VA 23218
Phone: (804) 698-4326
Fax: (804) 698-4319
E-mail: Julia.Wellman@deq.virginia.gov

From: Forsgren, Diedre (VDH)
Sent: Thursday, January 19, 2012 4:17 PM
To: Wellman, Julia (DEQ)
Subject: (11-208F) EA: New Entrance to Chopawamsic Backcountry Area

DEQ Project #: 11-208F
Name: New Entrance to Chopawamsic Backcountry Area
Sponsor: DOI/National Park Service
Location: Prince William & Stafford Counties

VDH – Office of Drinking Water has reviewed DEQ Project Number 11-208F. Below are our comments as they relate to proximity to **public drinking water** sources (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems must be verified by the local utility.

No groundwater wells are within a 1 mile radius of the project site.

The Quantico Marine Base Mainside/Breckenridge Reservoir surface water intake is located approximately two and a half miles downstream of the project site.

Project falls within Zone 1 (up to 5 miles into the watershed) of the Quantico intake, but does not fall within Zone 2 (greater than 5 miles into the watershed) of any public surface water sources.

There are no apparent impacts to public drinking water sources due to this project.

The Office of Drinking Water suggests coordination with the waterworks operator during construction.

Diedre Forsgren
Office Services Specialist
VIRGINIA DEPARTMENT OF HEALTH

Office of Drinking Water, Room 622-A
109 Governor Street
Richmond, VA 23219
Phone: (804) 864-7241
email: diedre.forsgren@vdh.virginia.gov

Wellman, Julia (DEQ)

From: Harlan, Tom (DOF)
Sent: Monday, January 30, 2012 4:52 PM
To: Wellman, Julia (DEQ)
Subject: RE: Comments Due: DEQ 11-208F

Project Title: New Entrance to Chopawamsic Backcountry Area Project Number: 11-208F

Department of Forestry Comments:

This project will have no significant impact to the overall forest resources of the Commonwealth. Although the plan calls for removal of up to 189 trees on 0.5 acres, the species that are being removed are common in the surrounding forest. Care should be taken to protect the surrounding forest resource.

Parking and stacking of heavy equipment and construction materials near trees can damage root systems by compacting the soil. Soil compaction, from weight or vibration, affects root growth, water and nutrient uptake, and gas exchange. The protection measures suggested above should be used for parking and stacking as well as for moving of equipment and materials.

Any stock piling of soil should take place away from trees. Piling soil at a tree stem can kill the root system of the tree. Soil stockpiles should be covered, as well, to prevent soil erosion and fugitive dust.

Questions pertaining to protection of trees and forest resources of the Commonwealth, may be addressed to Tom Harlan, Forest Resource Management Division at the DOF (telephone 434-220-9064, email: tom.harlan@dof.virginia.gov)

Tom Harlan
Forest Resource Management Division
tom.harlan@dof.virginia.gov
434-220-9064

-----Original Message-----

From: Wellman, Julia (DEQ)
Sent: Friday, January 27, 2012 2:17 PM
To: Ewing, Amy (DGIF); Cromwell, James R. (VDOT); Ray, Alfred C. (VDOT); Kirchen, Roger (DHR); Harlan, Tom (DOF)
Subject: Comments Due: DEQ 11-208F

This email is a reminder that comments were due on Jan. 20 regarding the environmental assessment and federal consistency determination for the new entrance to Chopawamsic backcountry area. If you would like to comment, please email me as soon as possible. Thanks.

Julia Wellman
Environmental Impact Review Coordinator
Virginia Department of Environmental Quality Office of Environmental Impact Review PO Box 1105 Richmond, VA 23218
Phone: (804) 698-4326
Fax: (804) 698-4319
E-mail: Julia.Wellman@deq.virginia.gov



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Douglas W. Domenech
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

February 2, 2012

Vidal Martinez, Superintendent
Prince William Forest Park
18100 Park Headquarters Road
Triangle, Virginia 22172-1644

RE: PEPC Project No. 19385
Build New Entrance to Chopawamsic Backcountry Camping Area
Prince William County, Virginia
DHR File No. 2008-1722

Dear Mr. Martinez:

Thank you for your letter of January 26, 2011 requesting our concurrence with your determination of No Adverse Effect on historic properties for the referenced project. Supporting documentation included copies of the Environmental Assessment titled *New Entrance to Chopawamsic Backcountry Area* (November 2011) as well as the report of the Identification (Phase I) archaeological survey titled *Archeological Survey of the Proposed Parking Lot in Chopawamsic Backcountry Area* prepared in October 2010 by John Bedell of The Louis Berger Group, Inc. We also appreciate receiving "*Few Knew That Such a Place Exists*" *Land and People in the Prince William Forest Park* also prepared by John Bedell in April 2004. The reports will be a welcome addition to our archives. Based upon the documentation provided, we concur that the proposed project will have No Adverse Effect on historic properties. More detailed comments follow.

Archeological Survey. I am pleased to inform you that the report titled *Archeological Survey of the Proposed Parking Lot in Chopawamsic Backcountry Area* prepared in October 2010 successfully meets the *Secretary of the Interior's Standards and Guidelines for Archeological Documentation* (48 FR 4434-37) and our state *Guidelines for Conducting Cultural Resource Survey in Virginia* (rev. 201). No archaeological sites were identified during the survey. We agree with the consultant's recommendation that no further archaeological investigations are warranted in connection with this project.

Environmental Assessment. We agree with the Park's selection of Alternative 2 as the preferred option. The document appears thorough in its consideration of cultural resources. In particular we note the discussion of impacts to Bobcat Ridge Road which is considered a feature of the potential cultural landscape. The proposed mitigation measures appropriately include the treatment of post-review archaeological discoveries as well as measures to minimize effects on Bobcat Ridge Road by avoiding cutting, scraping, grading, or other excavation of the roadbed, controlling erosion by adding a protective layer of mulch or gravel as needed and limiting use of the roadbed to foot traffic (with the exception of emergency vehicles).

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6416
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Office
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Tidewater Region Office
14415 Old Courthouse Way 2nd
Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5428
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7031
Fax: (540) 868-7033

If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me at (804)482-6088; fax (804) 367-2391; e-mail ethel.eaton@dhr.virginia.gov. We look forward to working with you on future projects.

Sincerely,



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

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6416
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Office
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Tidewater Region Office
14415 Old Courthouse Way 2nd
Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5428
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7031
Fax: (540) 868-7033

If you cannot meet the deadline, please notify JULIA H. WELLMAN at 804/698-4326 prior to the date given. Arrangements will be made to extend the date for your review if possible. An agency will not be considered to have reviewed a document if no comments are received (or contact is made) within the period specified.

REVIEW INSTRUCTIONS:

- A. Please review the document carefully. If the proposal has been reviewed earlier (i.e. if the document is a federal Final EIS or a state supplement), please consider whether your earlier comments have been adequately addressed.
- B. Prepare your agency's comments in a form which would be acceptable for responding directly to a project proponent agency.
- C. Use your agency stationery or the space below for your comments. **IF YOU USE THE SPACE BELOW, THE FORM MUST BE SIGNED AND DATED.**

Please return your comments to:

MS. JULIA H. WELLMAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL IMPACT REVIEW
629 EAST MAIN STREET, SIXTH FLOOR
RICHMOND, VA 23219
FAX #804/698-4319
Julia.Wellman@deq.virginia.gov

RECEIVED

JAN 20 2012

DEQ-Office of Environmental
Impact Review


JULIA H. WELLMAN
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Prince William County has reviewed proposal. Existing trail entrance (on Breckenridge Road) involves lands owned by Quantico and is being closed for security reasons. Proposed new entrance (from Joplin Road) involves minimal site clearance (less than 0.15 acre). Property will be managed by National Park Service. No adverse impact on PWC.

(signed) Heather (date) 1/17/12

(title) Planner III

(agency) Prince William County



Northern Virginia Regional Commission

December 29, 2011

RECEIVED

JAN 01 2012

DEQ-Office of Environmental
Impact Review

Chairman
Hon. Martin E. Nohe
Vice Chairman
Hon. Robert W. Lazaro, Jr.
Treasurer
Hon. Redella S. Pepper
Executive Director
G. Mark Gibb

Ms. Julia Wellman
Department of Environmental Quality
Office of Environmental Impact Review
629 East Main Street, Sixth Floor
Richmond, VA 23219

County of Arlington
Hon. Barbara A. Favola
Hon. Jay Fiset

Re: 11-208F New Entrance to Chopawamsic Backcountry Area

Dear Ms. Wellman:

County of Fairfax
Hon. Sharon Bulova
Hon. John C. Cook
Hon. Penelope A. Gross
Hon. Pat Herrity
Hon. Catherine M. Hudgins
Hon. Jeffrey C. McKay
Hon. Linda Smyth

The Northern Virginia Regional Commission staff has reviewed the document described above and has no comments as to the merits of this application pertaining to refinancing or federal assistance. However, if you do proceed with this project please be advised that any development is of course subject to local planning and zoning regulations. In addition, we offer the following:

County of Loudoun
Hon. Scott K. York

We would like to take this opportunity to note that the development will be occurring within the borders of the Occoquan Reservoir watershed. This reservoir serves as the drinking water source for over 800,000 people in the Northern Virginia area, and is an integral component of the Potomac River and Chesapeake Bay drainage basins. Special attention should be given towards erosion and sedimentation controls during construction. For post-construction stormwater quality management, the developing agency must adhere to the *post-development* water quality requirements set forth by the Virginia Stormwater Management Regulations (VR 215-02-00 Part IV and §2.3).

County of Prince William
Hon. Michael C. May
Hon. Martin E. Nohe
Hon. Frank J. Principi

City of Alexandria
Hon. Redella S. Pepper
Hon. Paul C. Smedberg

City of Fairfax
Hon. Joan Cross

City of Falls Church
Hon. Robin Gardner

City of Manassas
Hon. Harry J. Parrish II

City of Manassas Park
Hon. Suhas Naddoni

Town of Dumfries
Hon. Nancy West

Town of Herndon
Hon. Steve DeBenedittis

Town of Leesburg
Hon. Kenneth "Ken" Reid

Town of Purcellville
Hon. Robert W. Lazaro, Jr.

Town of Vienna
Hon. M. Jane Seeman

Meeting the Virginia Stormwater Management Regulations should comply with the requirement that state agencies meet the local ordinances pursuant to the Virginia Chesapeake Bay Act. Please be advised that the counties of Arlington, Fairfax, and Prince William, the City of Alexandria, and the Town of Herndon, have all enacted jurisdiction-wide Chesapeake Bay Resource Management Area (RMA) designation. This RMA designation requires that all development result in a no-net-increase standard for phosphorus loadings, based on the jurisdiction's average imperviousness. Please refer to the Northern Virginia BMP Handbook for calculation procedures. A copy of the Handbook is available from NVPDC at no charge to state agencies.

(as of July 1, 2011)

We would also suggest that, where possible, opportunities for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities should be explored. NVRC's *Guidebook for Maintaining BMPs in Northern Virginia* is available, without charge, should you need it; please call me if you would like to receive a copy to use as a reference.

A photocopy of this letter should be included with your submission to indicate that the review by this agency has been completed.

Your cooperation in the intergovernmental review process is appreciated.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Aimee Vosper". The signature is fluid and cursive, with the first name "Aimee" written in a larger, more prominent script than the last name "Vosper".

Aimee Vosper
Director, Environmental and Planning Services



IN REPLY REFER TO

United States Department of the Interior

NATIONAL PARK SERVICE

Prince William Forest Park
18100 Park Headquarters Road
Triangle, VA 22172

H30 (PRWI)

FEB 24 2012

February 24, 2012

Ms. Rene Hypes,
Environmental Review Coordinator
Virginia Natural Heritage Program
217 Governor Street, Third Floor
Richmond, VA 23219

Reference: New access point into Prince William Forest Park Chopawamsic Backcountry area, along US Route 619.
Subject: RE: Draft Environmental Assessment and Federal Consistency Determination: Department of the Interior/National Park Service, New Entrance to Chopawamsic Backcountry Area (DEQ 11-208F)

Dear Ms. Hypes:

Prince William Forest Park staff has thoroughly reviewed the comments provided by your agency on February 8, 2012 for an Environmental Assessment to establish a new parking area and trail access at the Prince William Forest Park Chopawamsic Backcountry Area. All recommendations, comments and concerns have been recorded and reviewed, and will be included in the final decision document. The Park recognizes a number of specific data gaps or omissions identified from the review letter and address these issues below.

- As recommended on by the DEQ, the park or contractor will contact DEQ NRO prior to installation or construction and operation of fuel burning or other air pollution emitting equipment [3(f)].
- As recommended, the NPS or contractor will prepare an erosion and sediment control (ESC) plan for this project, as regulated by the state and local law [4(b)].
- As recommended, the NPS or contractor will prepare a Stormwater Pollution Prevention Plan (SWPP) and submit for coverage under the General Permit for Discharges of Stormwater from Construction Activities, with the VA DCR [4(c)].
- As recommended, the park must address the issue of solid and hazardous waste. The Park will follow an established Park Emergency Action Plan to that includes

Hazardous Spill mitigations, and the Park Hazardous Materials and Toxic Waste Standard Operation Procedures (SOP) [6(d)].

- As recommended, the park must address its identification as a Formerly Used Defense Site (FUDS) [6(d)].
 - From 2003 - 2005 the NPS contracted The Army Corp of Engineers to assess Prince William Forest Park lands for remnant munitions and potential toxic or volatile residuals remaining in park soils, wells and the water table. The contractor assessed all park fee lands and portions of the Chopawamsic Backcountry Area, including the project site for the new access and parking lot. The Chopawamsic site was located in the impact zone for the Munitions Rang Site (MSR) 1 – OB/OD No. 3 in the Programmatic Work Plan for the FUDS assessment. The report states that no munitions were identified during the reconnaissance phase of the assessment; however the terrain and elevations do not preclude the existence of munitions. The report identified that due to the nature of training at the park, the aerial extent of contamination is estimated to be relatively small.
 - PRWI administrators will coordinate with the DEQ Federal Facilities Program regarding the referenced FUDS prior to construction.
- Prince William Forest Park will contact the local waterworks operator and the Prince William Health Department regarding applicable sewage regulations and requirements for vault toilets prior to construction [10(c) and 11(b)].

Thank you for your comments and participation in this environmental review process. We will incorporate the comments from pages 15 – 18 in your review, entitled **The Regulatory and Coordination Needs for Future Projects**, into our compliance process. We look forward to any further comments regarding this or future projects.

We look forward to hearing from you concerning the environmental planning process for future projects. If you have any comments please feel free to contact me at (703) 221-2366 (e-mail Vidal_Martinez@nps.gov).

Sincerely,



Vidal Martinez
Superintendent