



FINDING OF NO SIGNIFICANT IMPACT

PRINCE WILLIAM FOREST PARK COMPREHENSIVE TRAILS PLAN

Triangle, Virginia

The National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed Comprehensive Trails Plan for Prince William Forest Park (PRWI). The Plan is needed to address the following concerns and on-going issues affecting the park's trail system, including the lack of connectivity within and outside of the park, degraded trail conditions and associated contributions to streambank failures, and poor signage.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality (CEQ) for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and NPS Director's Order (DO) 12, Conservation Planning, Environmental Impact Analysis, and Decision-making. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

SELECTED ALTERNATIVE

Based on the analysis presented in the EA, NPS selected Alternative B: Action Alternative (page 10 of the EA) for implementation. The Comprehensive Trails Plan (Plan) will provide the NPS with a means by which new trails can be established; existing trails can be realigned to address existing design problems; and, if needed, expand allowed trail uses. The Plan also identifies locations for new access points to the park, three new parking areas, and expansion of up to four existing parking areas, all of which will support connections to the existing and planned regional trail network. Prior to implementation, the Park will cross-reference the EA, this FONSI, and all pertinent compliance requirements (i.e., Section 106 of the NHPA, Section 7 of the ESA, or other CZMA requirements) to ensure all compliance is still current and covers the actions as described in their entirety.

Prior to any ground disturbance activities, the site will be surveyed to avoid archeological sites, cemeteries, sensitive habitats, and steep and unsustainable slopes, and minimize crossings of water resources and wetlands, and unsuitable soils to the extent feasible. New and realigned trails, along with new and converted mountain biking and equestrian trails, will also be designed, constructed, and maintained according to appropriate trail design standards. The trails will use indigenous materials, muted colors, and a design that is representative of the rustic style and sympathetic and complementary to the surrounding landscape, and will be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. During construction of improvements outlined in the Plan, the NPS and/or its contractors will adhere to applicable best management practices to minimize erosion. Specifically, the Plan identifies:

- Approximately 12.9 miles of new trails (page 15 of the EA), which will:
 - generate links between existing trails to create shorter and longer loop options;
 - create new pedestrian access points into the park, and;
 - connect to new areas and features of interest in the park.
- Areas for new trails, including:
 - the northwest portion of the park;
 - areas along the North Branch of Quantico Creek, and;

- in the Chopawamsic Backcountry area.
- Locations where trail connections can be improved, such as:
 - South Fork Quantico Creek, within the Scenic Drive loop, and;
 - the Brittany neighborhood subdivision off of Exeter Drive.
- Approximately 29.3 miles of sections of existing trails that should be closed and/or realigned because of moderate or severe erosion, or other condition problems due to heavy use or poor design.
- Approximately 4.3 miles of trails (page 15-17 of the EA) that could be designed to be universally accessible for visitors with physical disabilities. All accessible trails would be designed and constructed to comply with the 2015 Architectural Barriers Act (ABA) Standards.
- Opportunities for new mountain biking trails to connect trails that currently allow mountain biking (i.e., maintained gravel roads), and provide more trail options for mountain bikers in the park. In total, the Plan outlines approximately 6.6 miles of trails designed, constructed, and maintained specifically according to mountain biking trail design parameters. All mountain biking routes will be shared with hikers and designated in accordance with 36 CFR 4.30. Specifically the Plan calls for:
 - opening up the 1.9-mile Oak Ridge Trail to mountain biking and creating an approximately 5.4-mile mountain biking trail loop starting and ending at the proposed new parking area along VA 234 (page 15 of the EA);
 - a trail designed, constructed, and maintained according to bicycle trail design parameters constructed parallel to the existing maintained gravel roads in the mountain biking trail loop, and;
 - a new trail connecting parking lot F and Burma Road that will allow hikers in addition to mountain bikers, but will be designed, constructed, and maintained according to bicycle trail design parameters.
- Approximately 7.8-mile equestrian trail loop starting and ending at a new parking area at Independent Hill (page 15 of the EA). The Plan outlines a trail loop proceeding along a new connecting trail to the Farms to Forest Trail Loop, then to West Gate Road, and back to a new connecting trail. The Plan calls for sections of the Farms to Forest Trail Loop to be improved to equestrian trail standards and continue to allow hikers. The Plan identifies location of a trail designed, constructed, and maintained according to equestrian trail design parameters (although still allowing hiking) parallel to the West Gate Road. In total, the Plan identifies approximately 5.3 miles of trails designed, constructed, and maintained specifically according to equestrian trail design parameters.
- Three new parking areas, including:
 - a paved lot of up to 100 spaces at VA 234 (Dumfries Road) that will accommodate cars, buses, and RVs;
 - a crushed stone (or similar material) lot of up to 25 spaces at VA 646 (Aden Road) at Independent Hill that could accommodate eight horse trailers, and;
 - a crushed stone (or similar material) lot at Lykes Lane that will replace an informal parking area located north of Lykes Lane, off Breckenridge Road (pages 15-16 of the EA).
- Expansion of four existing parking lots (lots E, F, H, and the Oak Ridge Campground Front Lot) by a total of up to 46 paved parking spaces (page 15 of the EA).
- Additional visitor access improvements that include:
 - a water access point, such as a pier or dock, at Lake 2/5 along the South Valley Trail; the Plan calls for these features to use indigenous materials, muted colors, and a design that is representative of the rustic style and sympathetic and complementary to the

surrounding landscape, and be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*;

- a viewing platform at the end of Lykes Lane to provide visitors with views to the Breckenridge Reservoir;
- improved signage throughout the park consistent with the Prince William Forest Park Long-Range Interpretive Plan guidelines, including signs providing information about allowed trail user groups and appropriate trail yielding etiquette, and;
- a new park entrance and orientation signage at the new VA 234 (Dumfries Road) and VA 646 (Aden Road) parking areas.

RATIONALE FOR DECISION

The NPS selected Alternative B for implementation because it best meets the purpose and need of the Comprehensive Trail Plan, as it provides comprehensive guidance for enhancing the park's trail system and visitor experience in a manner that is sympathetic with the natural and cultural surroundings and balances resource protection with intended trail uses and long-term management.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts and effects to cultural resources. Mitigation measures for effected resources are outlined in the EA are presented as Attachment A.

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As documented in the EA the selected alternative has the potential for adverse impacts on historic structures, cultural landscapes, and visitor use and experience, however, the NPS has determined that the selected alternative can be implemented without significant adverse effects, as defined in 40 CFR §1508.27.

Implementing the Plan will result in detectable direct and indirect adverse impacts on historic structures, including the Prince William Forest Park Historic District, the Chopawamsic Recreational Demonstration Area (RDA) Camp Historic Districts, the ECW Architecture at Prince William Forest Park, 1933-42, and the Cabin Branch Pyrite Mine Historic District. The closure and realignment of existing trails will result in adverse and beneficial impacts on contributing structures and sites within the Cabin Branch Pyrite Mine Historic District. Temporary adverse impacts on the Cabin Branch Pyrite Mine's structures and sites would occur during construction of new trail and realigned trails; however, the impacts will be short-term.

Adverse impacts will also include indirect impacts on the Prince William Forest Park Historic District, Chopawamsic RDA Camp Historic Districts, and the setting of the architectural typology and styling of ECW Architecture due to circulation and topography changes and the introduction of a Lake 2/5 water access feature, and new, accessible, and realigned trails within and in the vicinity of the Cabin Camps and other park buildings, structures, sites, and objects. The proposed park features will aim to minimize impacts on the Prince William Forest Park Historic District, Chopawamsic RDA Camps, and ECW Architecture by using indigenous materials, muted colors, and a design that is representative of the rustic style and sympathetic and complementary to the surrounding landscape. These design actions will be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. The new trails and water access feature will also expand visitor awareness of the historic resources within PRWI. Overall, changes to the Prince William Forest Park Historic District, Chopawamsic RDA Camps, and ECW Architecture will be noticeable, but will not result in the de-listing of the Prince William Forest Park Historic District, Chopawamsic RDA Camp Historic Districts, or the ECW Architecture at Prince William Forest Park from the National Register of Historic Places.

Implementing new accessible trails, closing existing trails, and realigning trails in Cabin Camp 1 as identified in the Plan will have detectable direct and indirect adverse impacts on the Cabin Camp 1 cultural landscape. The implementation of the Plan will alter the setting and feeling of the camp's buildings and structures. However, new trails will be designed to minimize impacts on the camp by using

Prior to the implementation of the selected alternative, PRWI will provide cultural landscape reports for the PRWI trails system and each of the Cabin Camps.

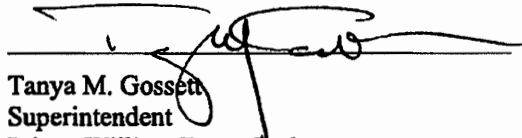
The selected alternative identifies locations where construction of new elements within the park will improve visitor access and connections, both to the park and within the park, as well as expand recreation opportunities. These improvements as identified in the Plan will temporarily disrupt visitor access to certain trails or locations within the park during construction, resulting in temporary adverse impacts on visitor use and experience during construction; however, the impacts will be short-term, within a site-specific area of the park, and phased over time.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

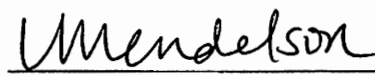
Recommended:


Tanya M. Gossett
Superintendent
Prince William Forest Park
National Capital Region

Date

5/28/2019

Approved:


Lisa A. Mendelson-Ielmini
Acting Regional Director
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Date

5/28/2019

Documents appended to the FONSI include:

- Appendix A: Mitigation Measures;
- Appendix B: Non-impairment determination;
- Appendix C: Response to public comments; and
- Appendix D: Section 106 coordination letters
- Appendix E: ERRATA

APPENDIX A: MITIGATION MEASURES

Cultural Resources

In order to avoid or minimize adverse effects on historic properties, several steps will be undertaken by NPS during implementation of the Action Alternative.

- PRWI would undertake Cultural Landscape Report for the trails system and for each Cabin Camp prior to the design and implementation of the Action Alternative.
- The new and realigned trails would be undertaken in a manner that is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- Design and construction of the water access feature would be undertaken in a way that is compatible with the Park's rustic design idiom and is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- NPS would provide interpretation of the Cabin Branch Mine Trail and North Valley Trail explaining their presence and significance within the Cabin Branch Pyrite Mine Historic District.
- NPS would conduct an archeological survey for undocumented areas where ground disturbance is proposed after exact project /limits-of-disturbance boundaries are identified and prior to any construction work. The survey would determine the presence or absence of archeological deposits in the footprint of disturbance. If NRHP-eligible or potentially eligible archeological resources are present, the NPS would define appropriate avoidance measures to be taken and would consult with DHR and consulting parties.
- If archeological resources are uncovered during construction, all excavation work in that area would cease and archeological resources would be investigated by archeologists of the park's cultural resources staff meeting the Secretary of Interior's Qualification Standards. If the archeological resources are determined to be potentially significant, the NPS would consult with the VDHR to determine the appropriate next steps and, if necessary, appropriate mitigation strategies. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3002) would be followed. All human remains, funerary objects, sacred objects, or objects of cultural patrimony would be left in place until the culturally affiliated tribe(s) was consulted and an appropriate mitigation or recovery strategy developed.
- In the event human remains are discovered, ground disturbing activities would immediately cease, appropriate NPS Cultural Resources staff would be notified, as well as the local authorities, such as the police and/or the coroner, and the VDHR in compliance with the Code of Virginia 10.1-2035. Paleontological remains and archeological specimens found within the construction area would be removed only by the NPS or their designated representatives. Workers would be informed on the penalties for illegally collecting artifacts or intentionally damaging archeological or historic properties. Workers would be informed of the correct notification procedures in the event that previously unknown resources were uncovered during construction. In designated areas, ground-disturbing activities would be monitored by a NPS qualified archeologist for unanticipated discovery of archeological resources. If cultural material is uncovered during construction, work in the immediate area would be stopped, the site secured, and GWMP would consult with VDHR per 36 CFR 800.13.

Visitor Use and Experience

Construction work of elements identified in the Plan will occur during off-peak visitor use periods, to the extent practicable. The NPS will include in its website best practices and etiquette for visitor uses. The NPS will coordinate with existing or new volunteer organizations at the park, such as PATC or equestrian clubs, to perform monitoring and maintenance activities that would minimize visitor use conflicts.

APPENDIX B: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (54 USC 100101).

NPS Management Policies 2006, Section 1.4 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.

This determination on impairment has been prepared for the selected alternative described in this Finding of No Significant Impact. An impairment determination is made for the resource topics of historic structures and cultural landscapes. These resources are considered fundamental Prince Williams Forest Park because of the historical significance of the park. An impairment determination is not made for visitor use and experience 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. This determination on impairment has been prepared for the action alternative described in Chapter 2 of the Prince William Forest Park Comprehensive Trails Plan EA. Impairment findings are not necessary for visitor use and experience because impairment findings relate back to park resources and values, and this impact area is 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. An impairment determination is made for all other resource impact topics analyzed for the preferred alternative.

HISTORIC STRUCTURES

Prince William Forest Park includes a variety of contributing buildings, sites, structures, and objects within the Prince William Forest Park Historic District, the Chopawamsic Recreational Demonstration Area (RDA) Camp Historic Districts, the ECW Architecture at Prince William Forest Park, 1933-42, and the Cabin Branch Pyrite Mine Historic District. The introduction of a Lake 2/5 water access feature, and new, accessible, and realigned trails within and in the vicinity of the Cabin Camps and other park buildings, structures, sites, and objects, as well as circulation and topography changes under the preferred alternative would have noticeable adverse impacts on historic structures. However, the proposed park features would use indigenous materials, muted colors, and a design that is representative of the rustic style and sympathetic and complementary to the surrounding landscape. These design actions would be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. The new trails and water access feature would also expand visitor awareness of the historic resources within PRWI.

While the preferred alternative would result in noticeable adverse impacts on the Prince William Forest Park Historic District, Chopawamsic RDA Camps, and ECW Architecture, these impacts would not result in the de-listing of the Prince William Forest Park Historic District, Chopawamsic RDA Camp Historic Districts, or the ECW Architecture at Prince William Forest Park from the National Register of Historic Places. The preferred alternative would result in temporary adverse impacts on the Cabin Branch Pyrite Mine Historic District during construction; however the impacts would be short-term. Following the construction period, the preferred alternative would have a noticeable beneficial impact on the Cabin

Branch Pyrite Mine Historic District. Therefore, there will be no impairment to the park's resources related to historic structures because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

CULTURAL LANDSCAPES

Cultural landscapes at Prince William Forest Park include Cabin Camp 1. Implementing new accessible trails and closing and realigning trails with moderate or severe erosion or other design issues in Cabin Camp 1 under the preferred alternative would have detectable direct and indirect adverse impacts on the Cabin Camp 1 cultural landscape due to changes in topography and the setting and feeling of the camp's buildings and structures. However, new trails would use indigenous materials, muted colors, and a design that is representative of the rustic style and sympathetic and complementary to the surrounding landscape. These design actions would be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

Overall, the preferred alternative would have noticeable impacts on the Cabin Camp 1 cultural landscape. However, the adverse impacts would not diminish the integrity of the cultural landscape and would enhance opportunities for enjoyment of the cultural landscape within Prince William Forest Park. Therefore, there will be no impairment to the park's resources related to cultural landscapes because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

ARCHEOLOGY

Prior to implementation of the Plan, sites proposed for a new trail or facility will be surveyed in order to avoid impacts to archeological resources. As a result, there will be no impairment to these resources.

APPENDIX C: PUBLIC COMMENT RESPONSES

Topic	Concern Statement	Response
Support for No-Action Alternative	Multiple comments requested that no changes occur at the park.	Comment noted.
Support for Action Alternative	<p>Of the 207 total correspondences received, 159 correspondences expressed support for the Action Alternative in general and/or for specific elements of the Action Alternative. Categorized, the number of correspondences received expressing support for specific elements of the Action Alternative included:</p> <ul style="list-style-type: none"> • Mountain biking trails – 110 correspondences • Park access from VA 234 (Dumfries Road) – 21 correspondences • Trails in general – 18 correspondences • Equestrian trails – 17 correspondences • Accessible trails – 13 correspondences • General addition and/or improvements of parking – 5 correspondences • New trails at other specific locations – 4 correspondences • Hiking trails – 3 correspondences • New trail from the Brittany neighborhood – 4 correspondences • Improvements to existing trails with design problems – 3 correspondences • Park access from VA 646 (Aden Road) - 2 correspondences • Improved signage – 2 correspondences • Accessible trails in Cabin Camps – 1 correspondence • General addition of other access points to the Park – 1 correspondence 	Comments noted.
Concerns and Opposition to Expansion of the Mountain Biking Trail System	Mountain bikes damage trails, and over time, damage the beauty, trees and other plants, and functionality of trails for hiking in the park. This would especially be the case in the Oak Ridge trail.	As identified in the EA on Pages 11 and 15, the Action Alternative would expand the mountain biking trail system by opening the Oak Ridge Trail to mountain biking and creating a mountain biking trail loop consisting of new trails and new trails constructed parallel to existing maintained gravel roads in the loop. As identified in the EA on Page 6 and in Appendix A, new and realigned trails (including the Oak Ridge Trail as identified in Appendix B on Pages 7-8) would be designed to be sustainable

Topic	Concern Statement	Response
		in relation to slopes and would let water sheet across a trail in a manner that minimizes erosion. Specific BMPs to minimize soil erosion would be developed as the planning and design state of the proposed project continues.
Concerns and Opposition to Expansion of Equestrian Uses and Trails	Allowing horses on trails will be detrimental to the fragile ecosystem already undermined by numerous other factors like overcrowding, native plant degradation, erosion, and underfunding.	<p>The EA states on Page 10 that “the alignment of new and realigned trails . . . would be carefully sited to avoid . . . sensitive habitats, and steep and unsuitable slopes, and minimize crossings of water resources and wetlands, and unsuitable soils to the extent feasible, as described in Appendix A.” This includes all trails proposed in the equestrian trail loop.</p> <p>Additionally, as identified in the EA on Page 6 and in Appendix A, new and realigned trails would be designed to be sustainable in relation to slopes and would let water sheet across a trail in a manner that minimizes erosion. Specific BMPs to minimize soil erosion would be developed as the planning and design state of the proposed project continues.</p>
	The proposed trail system expansion might be too ambitious and add too much trail density, especially in the northwest corner of the park where heavier-duty use (equestrian) is proposed.	Comment noted.
Concerns about User Conflicts	Multi-use trails, particularly two-way trails, and how horses, hikers, and mountain bikers could occupy and use the same trails, raises safety concerns due to startling horses and people, sight lines, and other elements.	<p>Comment noted. The proposed mountain biking trails in the Action Alternative would allow hikers in addition to mountain bikers, but would not allow equestrians. The proposed equestrian trails in the Action Alternative would allow hikers in addition to equestrians, but would not allow mountain bikers.</p> <p>The design parameters identified in Appendix A for the proposed mountain biking trails in the Action Alternative include trail tread widths for single lane trails and double lane trails. At this time, whether the proposed mountain biking trails are single lane or double has not been identified. The design, construction, and maintenance of the proposed mountain biking trails and equestrian trails would be according to U.S. Forest Service bicycle and equestrian trail design parameters, respectively, identified in Appendix A.</p> <p>As identified in the EA on Page 12, the Action Alternative would place standardized trail signs at trailheads that allow mountain bikers. Signs at these trailheads would provide information about the allowed trail user groups and appropriate trail yielding etiquette.</p>

Topic	Concern Statement	Response
	The new public access point at VA 234 at Spriggs Rd and the new mountain bike trail to areas along Burma Rd and North Valley Trail have the potential to intrude on the privacy of groups occupying the Cabin Camps.	As identified in the EA on Page 12, the Action Alternative would place standardized trail signs at trailheads that allow mountain bikers. Signs at these trailheads would provide information about the allowed trail user groups and appropriate trail yielding etiquette. The North Valley Trail would continue to prohibit mountain biking in the Action Alternative.
	Trails should accommodate all uses, rather than be segregated by use.	Comment noted.
Concerns about Trail Surfaces	Improve more of the gravel roads to create a biking network. Specifically, improve bike accessibility from proposed parking area on VA 234 via Burma Road and Scenic Drive through a paved surface for multiple uses.	<p>The Plan does not preclude adapting the gravel roads to a biking network in the future. After implementation of this plan, the NPS could consider them if the need arises.</p> <p>Specifically, PRWI has already planned the paved link from VA 234 via Burma Road and Scenic Drive, which was included in a 2006 EA. Construction is expected once funding is available.</p>
	For equestrian uses, paved trails, or those with large gravel are not optimal. Care should be taken at water crossings to shore up banks and bridges that can accommodate horses.	Comments noted. As identified in the EA on Pages 11, 12, and 15, the Action Alternative would provide approximately 5.3 miles of trails designed, constructed, and maintained according to equestrian trail design parameters in Appendix A and a new parking area at VA 646 (Aden Road) that could accommodate eight horse trailers. As identified in Appendix A on Pages 7-8, the surface material of the proposed equestrian trails would be native, with some on-site borrow or imported material where needed for stabilization.
Concerns about Trail Routes	<p>Extend the paved bike path completely around Scenic Drive and add a bike path that leads to each campground site to allow for bicycles.</p> <p>Amend the Independent Hill trailhead and access trail modal split to facilitate full multi-use access, if feasible, to facilitated a critical link between the park and the newly-master planned Independent Hill area, and lies on US Bicycle Route 1.</p>	<p>Comment noted. Bicycles are allowed on roads leading to campgrounds.</p> <p>The plan places the equestrian and pedestrian trail at the northwest portion of the park, near the Independent Hill parking lot, in order to provide a loop trail that would be suitable for horses; this would be difficult to place elsewhere in the park.</p> <p>Bicycle access would be available at the Dumfries Road (VA 234) parking lot. The Dumfries Road shared use trail would offer connections between the Independent Hill and the VA 234 parking lot.</p>
Concerns about Trail Routes	Shift the alignment of the portion of the proposed and currently labeled equestrian trail from the intersection point with the 0.6 mile connector to West Gate Road and the	This would increase the mileage of area disturbed. Additionally, it would place the trail closer to streams leading to Quantico Creek,

Topic	Concern Statement	Response
Concerns about Trail Routes	point where it intersects the Farms to Forest trail to the north. The shift would maintain the trail outside the avoidance area and bypass an entire section of the Farms to Loop trail, effectively eliminating the need to use that trail at all by cyclists and equestrians.	increasing potential for impacts on water resources.
	Connect the South Valley and North Valley trails to create a loop through the park.	As identified in the EA on Page 15, the Action Alternative would provide a new trail between the North Valley Trail and Farms to Forest Trail Loop which connects to the South Valley Trail via the Oak Ridge Trail.
	Connect the South Valley trail and the Chompawimsick area.	The Action Alternative would also provide a new trail connecting the South Valley Trail to the Chopawamsic Trail at VA 619 (Joplin Road).
	Build a bridge across the stream that surrounds Brittany to allow older residents to enjoy the path in addition to the young and daring.	<p>Comment noted. The new trail from the Brittany neighborhood proposed in the Action Alternative would cross a riverine wetland. The EA states on Page 6 “Riverine wetland crossings associated with new trails and converted existing trails would be constructed to span the full channel width from uplands to uplands, thereby avoiding impacts to riverine wetlands.”</p> <p>The new trail from the Brittany neighborhood proposed in the Action Alternative would connect to Mulcaster Terrace.</p>
	Provide accessible trails linked to the Cabin Camps that allow visitors in wheelchairs to enjoy immersion in forested areas or spending time near creeks, such as a short loop through the forest that connects Quantico Creek to the accessible area within the cabin camp.	Comment noted. As identified in Appendix A on Page 4, accessible trail areas in Cabin Camps 1 and 4 and outside of the Cabin Camps would be located on existing zero to twelve percent slopes to the extent feasible. Trails in compliance with the 2015 Architectural Barriers Act Standards may have running slopes up to 12 percent. Slopes between Cabin Camps 1 and 4 and Quantico Creek are steeper than 12 percent, and are therefore inappropriate for accessible trails.
	Add new trails around Cabin Camp 1 to allow visitors to experience nature more closely, away from crowded trails. Provide reliable creek crossings from the Cabin Camps to connect to the main trail system (North Valley Trail), regardless of the water level of the creek.	The new Cabin Camp 1 and 4 connecting trails to the North Valley trail proposed in the Action Alternative would cross riverine wetlands. The EA states on Page 6 “Riverine wetland crossings associated with new trails and converted existing trails would be constructed to span the full channel width from uplands to uplands, thereby avoiding impacts to riverine wetlands.”
	Provide a trail entrance to PWF at the Fortuna Center Plaza/Brittany Neighborhood Park area (Figure 1); the route shown in Alternative B involves another 2/3 mile walk along residential streets to reach the park.	The route from the Brittany Neighborhood shown under Alternative B would formalize existing social trails; would minimize the disturbance of vegetation and soils; and would not require new wetlands crossings.
	Do not add entrance to Brittany neighborhood.	Comment noted.
	Add a trailhead at the cul-de-sac of Johnson Road (a public road) southwest of where the Entrance Drive intersects Scenic Drive. Johnson Road intersects Joplin Road just	The Plan does not preclude the addition of a trailhead at Johnson Road and new future trail connecting to Scenic Drive as part of future planning efforts. These trail changes could

Topic	Concern Statement	Response
	across from the entrance to the Quantico National Cemetery, which would allow a direct and safe trail connection from PWFP to the Cemetery. Add a trail that connects the trailhead to Scenic Drive.	result in increased impacts on water resources, vegetation, and soils as a result of greater area of impervious surfaces.
	Include the considered perimeter trail because the Joplin Road corridor is increasingly unsafe for bicyclists and has no existing pedestrian infrastructure. The perimeter trail would facilitate bicycle and pedestrian travel to multiple sites within the area.	<p>Comments noted. A perimeter trail on parkland was dismissed from further consideration because the trail would not meet the EA's Purpose and Need, as described on Page 1. It would not balance resource protection with intended trail uses and long-term management. It would require encroachment into multiple resource avoidance areas identified in the EA. The alignment would likely have detectable resource impacts on wetlands, archeological sites, soils, and vegetation due its proposed length, which would increase to conform to trail design guidelines, to minimize environmental impacts, and to avoid private property and utilities adjacent to Joplin Road.</p> <p>NPS would support Virginia and Prince William County efforts to develop a path within the existing Virginia Department of Transportation (VDOT) right-of-way of Joplin Road.</p>
Concerns about Potomac Heritage National Scenic Trail	Include the Potomac Heritage National Scenic Trail route connecting Prince William Forest Park to Dumfries via Mine and Van Buren Roads in the analysis. This trail connection is the preferred connection to the main PHNST corridor and will be included in the County's update to its own Comprehensive Plan. The Dumfries area is historically underserved by trails and other bicycle and pedestrian infrastructure and this trail connection to Prince William Forest Park's resources will enhance the equitable access to outdoor recreation in the county.	<p>Comments noted.</p> <p>Page 13 of the EA states that NPS considered a new connecting trail from Van Buren Road or Mine Road into the park as a means for adding a new access point closer to the town of Dumfries.</p> <p>Additional planning and design among NPS, VDOT, Prince William County, the Town of Dumfries, and other external stakeholders is needed to realize trail connections in this area. This trails plan does not preclude the establishment of future trails in this location, if and when coordinated planning has occurred.</p> <p>NPS does support further consideration of a trail connection in this area associated with the use of the Washington-Rochambeau Road. (see below). Locating a trail connection in this area may be otherwise prohibitive. As identified in Appendix A on Page 1, new trails in the Action Alternative would avoid the "Avoidance Area" and follow guidance for creating sustainable trails in relation to slopes, including avoiding slopes greater than 50 percent. A majority of parkland adjacent to this section of Mine Road is in the Avoidance Area. The trail would have to traverse through existing slopes greater than 50 percent.</p>
Concerns about Potomac Heritage National Scenic Trail	Include a route from the Visitor Center to Mine Road, along the Washington	Comment noted. Page 13 of the EA states that the NPS considered a new trail within or along

Topic	Concern Statement	Response
	Rochambeau route, and link to historic Dumfries. If a trail along the Washington-Rochambeau Road is not immediately possible, an interim parallel trails should be created.	<p>the now obsolete segment of the Washington-Rochambeau Road located at the eastern edge of the park. The option was dismissed from further consideration at this time because a cultural landscape treatment plan has not yet been developed for the historic road trace. This trails plan does not preclude a trail in this location if future cultural landscape treatment options are developed to accommodate visitor use of the trace as a trail, or visitor use adjacent to the historic feature.</p> <p>The creation of an interim parallel trail would result in the disturbance of vegetation and soils multiple times. Furthermore, a trail within sight of the Washington-Rochambeau Road would be dependent upon final cultural landscape treatment recommendations.</p>
Concerns about Parking	Park should allow several horse trailers to use the facility, and importantly to turn around.	As stated on Page 12 of the EA, “The new parking area at VA 646 (Aden Road) ... could accommodate eight horse trailers.”
Concerns about Parking	The expansion of mountain biking at the park would increase demand for the existing limited parking.	As identified in the EA on Pages 12 and 15, the Action Alternative would provide three new parking areas and expand four existing parking areas. The three new parking areas would provide a total maximum of 148 new parking spaces. Existing lots E, F, H, and the Oak Ridge Campground Front Lot would also be expanded by a total of up to 46 parking spaces.
Concerns about VA 234 (Dumfries Road) Park Access	A new parking lot off VA 234 would increase in trash and pollutants.	Comment noted. NPS would operate and maintain the facility similar to other parking lots.
	A new parking lot off VA 234 would remove bird habitat.	The Appendix on Page 8 states “New parking areas would use areas with existing tree clearings or prior, non-historic (i.e., disturbed), when possible.” The EA on Page 8 also states “NPS biologists or other qualified personnel would develop applicable BMPs to minimize impacts on animal wildlife.”
	A new parking lot off VA 234 would increase the need for additional trail connections.	The Action Alternative would not allow public vehicle access or pave the link from the new parking area to Scenic Drive via Spriggs Road/Burma Road, which would continue to provide trail connections.
	A new parking lot off VA 234 should have a smaller pavement footprint than 100 spaces.	As identified in the EA on Page 12, the proposed maximum number of parking spaces for the new VA 234 (Dumfries Road) parking area would be 100 spaces. At this time, the exact number of parking spaces has not been identified.
Concern for Invasive Vegetation	The implementation of the plan introduces threats of increased exotic plant dispersal through horse manure and new trails and new invasives from fill brought in for parking lot	Comment noted. The EA on Page 7 states “The NPS would manage and remove exotic and invasive plant species in accordance to the NPS National Capital Region region-wide invasive

Topic	Concern Statement	Response
	construction that NPS would be unlikely to effectively manage.	plant management plan and specific PRWI policies.”
Suggested Improvements	Update the Chopawamsic Backcountry area and expand that parking lot.	Parking is currently available at the new Chopawamsic Backcountry Lot off of VA 619 (Joplin Road). As identified in the EA on Page 12 and 15, the Action Alternative would provide a new parking area at Lykes Lane, providing access to the Chopawamsic Backcountry Area.
	Provide at Parking Lot D a mirror image of the current parking lot on the other side of the scenic drive between North Orenda Road and Pyrite Mine Road to alleviate overcrowding.	Comment noted. As identified in the EA on Pages 12 and 15, the Action Alternative would expand parking lots E, F, and H. The EA states on Page 33 that the expansion of these lots “would provide visitors with additional parking options along the one-way section of Scenic Drive when parking lot D is at capacity.”
Management and Partnerships	Commit to better regulating/restricting mountain bike users to that designated trail to ensure the safety of pedestrian traffic along Burma Road and North Valley Trail and reduce intrusion on the privacy of groups occupying the Cabin Camps.	Page 12 of the EA states “Signs at shared-use trailheads would provide information about the allowed trail user groups and appropriate trail yielding etiquette.”
	Rely on user-specific groups to maintain related trail sections.	NPS will continue to coordinate with partner groups to help maintain trails.
	Maintain stream crossings and fire roads in a way that ensures consistent use.	NPS will continue to coordinate with partner groups to help maintain trails.
Signage	Improve trail signage	Page 12 of the EA states Standardized trail signs would be placed at new trailheads, accessible trailheads, critical trail intersections, and trailheads that allow mountain bikers or equestrians. New signs would provide clear direction for the navigation of new, existing, and realigned trails.”

APPENDIX D: SECTION 106 COORDINATION LETTERS



IN REPLY
REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Prince William Forest Park
18100 Park Headquarters Road
Triangle, VA 22172

1.A.2. (PRWI/RM)

February 13, 2018

Virginia Department of Historic Resources
Attn.: Ms. Julie Langan
State Historic Preservation Officer
2801 Kensington Avenue
Richmond, VA 23221

Subject: Prince William Forest Park Comprehensive Trail Plan and Environmental
Assessment—Section 106 Consultation

Dear Ms. Langan:

The National Park Service (NPS) is preparing a Comprehensive Trail System Plan and corresponding Environmental Assessment (EA) for Prince William Forest Park (PRWI). The NPS is formally initiating consultation for this project with the Virginia Department of Historic Resources (DHR), in accordance with 36 CFR 800.3 of Section 106 of the National Historic Preservation Act.

At more than 14,000 acres, PRWI is the largest continuous protected natural area in the NPS National Capital Region. It is also the largest example of a Piedmont forest in the National Park System, serving as a sanctuary for a diversity of plants and animals. The park contains approximately 30 miles of trails that are currently limited to pedestrian use, and approximately 10.5 miles of gravel roads that are open to pedestrian and bicycle use. The park contains the largest collection of Civilian Conservation Corps (CCC) structure in the National Park System. Additionally, the park contains remnants of homesteads, historic town sites, mines, and other diverse cultural resources. The entire park is listed in the National Register of Historic Places as a Cultural Landscape.

The NPS is developing a Comprehensive Trail Plan for PRWI to provide comprehensive guidance for enhancing the park's trails system and visitor experience in a manner that balances overall resource protection with intended trail uses and long-term management. The Plan is meant to provide park managers with a framework by which they can manage and maintain existing trails; close/re-align existing trails when needed; add new trails and access points where appropriate; and, where feasible, create trails that are universally accessible. The Plan is needed to address the following concerns and on-going issues affecting the park's trail system:

- Over the years, trail segments were added incrementally without an adequate comprehensive approach resulting in an overall trail system that has connection issues and is difficult to maintain.

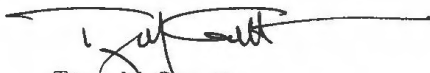
- Many of the park's existing trails have eroded and degraded due poor design and alignment, resulting in safety concerns.
- Due to heavy use and erosion, some trail segments are contributing to streambank failures, which increases stream sedimentation and habitat degradation.
- Some trail segments do not connect features of interest within the park, which encourages park visitors to go off trail creating resource issues.
- There is a lack of standardized trail signage.
- The full breadth of allowable park trail uses has never been comprehensively planned and assessed.
- The park lacks logical connections to, and integration with, local and regional trail systems.
- There is no direct access to the park for the communities along the Route 234 corridor, requiring those park neighbors to either travel a considerable distance to access the Park or enter the park through the use of social trails.
- Certain park destinations, such as Carter's Pond and the Pine Grove Picnic Area, do not fully meet accessibility standards.

The NPS is developing an EA for the Comprehensive Trail System Plan in accordance with the National Environmental Policy Act (NEPA). The NPS will also develop an Assessment of Effect for this project as a separate, but parallel, process to the EA. The proposed Area of Potential Effect is the project site, as shown in the attached map. However, at this early stage, we are unable to make any determination of effect. We are planning to consult with the public per 800.3(e) in public meetings and through our Planning, Environment, and Public Comment website (<https://parkplanning.nps.gov/>). We anticipate that these outreach efforts will accommodate the requirements of both NEPA and the Section 106 processes.

A copy of the EA and the Assessment of Effect will be provided to your office for review when it becomes available, and we anticipate further consultation with your office as mandated by Section 106.

We look forward to working with you on this project. If you have any questions, please do not hesitate to contact Tammy Stidham at (202) 619-7474 or via email (tammy_stidham@nps.gov).

Sincerely,



Tanya M. Gossett
Superintendent

Enclosure: Proposed Area of Potential Effect



IN REPLY
REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Prince William Forest Park
18100 Park Headquarters Road
Triangle, VA 22172

March 18, 2019

Virginia Department of Historic Resources
Attn.: Ms. Julie Langan
State Historic Preservation Officer
2801 Kensington Avenue
Richmond, VA 23221

Subject: Prince William Forest Park Comprehensive Trails Plan, Environmental
Assessment and Assessment of Effects

Dear Ms. Langan:

The National Park Service (NPS) has prepared an Environmental Assessment (EA) and Assessment of Effects (AOE) to analyze the potential impacts of two alternatives, including a no-action alternative, for the proposed Prince William Forest Park (PRWI) Comprehensive Trails Plan (Plan). Enclosed, please find a copy of the Plan and EA, and the AOE.

The purpose of the Plan is to provide comprehensive guidance for enhancing the park's trail system and visitor experience in a manner that is sympathetic with the natural and cultural surroundings and balances resource protection with intended trail uses and long-term park management. The proposed project is meant to provide park managers with a framework by which they can manage and maintain existing trails; close/realign existing trails when needed; add new trails and access points where appropriate; and, where feasible, create trails that are universally accessible to meet the Architectural Barriers Act Accessibility Standards (ABAAS) standards.

The Plan and EA are being released to the public for a 30-day review period from March 18 to April 18, 2019. Following the review period and analysis of public comments, a decision document will be released.

As a federal undertaking, the project is subject to historic preservation consultation in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. The entire park north and east of VA 619 (Joplin Road) is listed in the National Register of Historic Places (NRHP) as a historic district. Within the park, Cabin Camps 1-4 and the Cabin Branch Pyrite Mine are also listed in the NRHP as historic districts.

On February 13, 2018, the NPS wrote to formally initiate Section 106 consultation with your office for the Plan and EA. Due to the early stage of the project, NPS did not make any determination of effect. Following development of the Plan and EA, ongoing consultation on the project, and development of an AOE, the NPS now has sufficient information to make a formal determination.

NPS has concluded that while the implementation of individual elements of the Plan has the potential to result in direct and indirect adverse effects to the historic resources or its contributing features, if each element is implemented in a way that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties, the net result will be no adverse effect. Since the NPS has a nationwide Programmatic Agreement and works closely with the Virginia State Historic Preservation Officer to implement projects that may adversely affect historic properties, the NPS has determined that the adoption of the Plan (Alternative B) will have no adverse effect on historic properties conditioned upon the fact that, as laid out in the 2008 NPS Programmatic Agreement, each element of the Plan as it is implemented will undergo consultation. As funding becomes available to implement the Plan, each project would be subject to Section 106 consultation with the Virginia State Historic Preservation Officer, some of which may be undertaken as outlined in the NPS nationwide Programmatic Agreement. In order to further avoid or minimize adverse effects on historic properties, NPS would undertake the following steps during implementation of the Plan.

- NPS would undertake a Cultural Landscape Report for the trails system and for each Cabin Camp prior to the implementation of the Plan
- NPS would provide interpretation of the Cabin Branch Pyrite Mine Trail and North Valley Trail explaining their presence and significance with the Cabin Branch Pyrite Mine Historic District
- NPS would conduct an archeological survey for undocumented areas where ground disturbance is proposed after exact project/limits-of-disturbance boundaries are identified and prior to any construction work. NPS would define appropriate avoidance, minimization, or mitigation measures to be taken and would consult with DHR and consulting parties if NRHP-eligible or potentially eligible archeological resources are present.

The NPS seeks your concurrence with our effects finding as summarized above and detailed in the enclosed AOE. We look forward to receiving your continued input on this project. If you have any questions, please do not hesitate to contact Tammy Stidham at (202) 619-7474 or via email (tammy_stidham@nps.gov).

Sincerely,



Tanya Gossett
Superintendent
Prince William Forest Park

I concur that the above-described project will not have an adverse effect on historic properties located upon Prince William Forest Park.

Cory D. L. Smith For
State Historic Preservation Officer

4/26/19
Date

Enclosures: Prince William Forest Park Comprehensive Trails Plan and Environmental Assessment, Assessment of Effects

APPENDIX E: ERRATA

PRINCE WILLIAM FOREST PARK COMPREHENSIVE TRAILS PLAN ENVIRONMENTAL ASSESSMENT - ERRATA

The following changes have been made to the *Prince William Forest Park Comprehensive Trails Plan Environmental Assessment* (March 2019) Finding of No Significant Impact (FONSI) to correct minor statements of fact and update information. The original text is shown below in strikethrough, followed by the replacement text in underline.

This additional language was originally omitted from the Plan, however this revision does not change the outcome of the impact analysis, nor do they affect the final decision documented in the FONSI.

Page 10, first paragraph under Alternative B description

Alternative B would be the implementation of the proposed project. Alternative B proposes to provide new trails and accessible trails, realign existing trail sections with design problems, and expand allowed uses on trails in the park. Alternative B also proposes to provide new access points to the park, add three new parking areas, and expand four existing parking areas, which would support connections to the existing and planned regional trail network. These changes to trail, use, access, and parking would augment ongoing trail maintenance and resources management practices. Implementation of the actions outlined in this plan would be done incrementally as funding becomes available through a combination of appropriated funds and through donations/partnerships. The Park also plans to establish cooperative agreements with a number of partners for the long term maintenance of the improved/expanded trails. These elements are described below and shown in Figure 2 through Figure 4. The “Avoidance Area” shown in these figures is described in Appendix A.

Alternatives Considered but Dismissed, Page 13

Trails Connecting Cabin Camps—~~New trails providing direct connections between cabin camps were considered. Excluding Cabin Camp 3, the cabin camps are only available to rent by groups. The cabin camps are popular sites for organized groups such as scouts, church groups, clubs, weddings, family reunions, and a number of groups sensitive to disturbance. The option was dismissed from further consideration because groups from different cabin camps could potentially disturb the privacy of other cabin camp groups and events.~~

Trails Connecting Cabin Camps - New trails providing direct connections between cabin camps were considered. Excluding Cabin Camp 3, the park rents cabin camps exclusively to large groups. The rustic and secluded cabin camps are popular among school and youth groups, civic organizations, religious groups, families, organizations supporting vulnerable populations, recreational clubs, and event organizers. This option was dismissed from further consideration to maintain privacy among cabin camp groups and to avoid visitor use conflicts.

Specific Routes for Washington-Rochambeau Road and Van Buren or Mine Roads Access – ~~Several additional trail routes connecting to regional trails and pedestrian system were also considered. In these cases, no specific route was identified due to the need for additional information or planning.~~

~~o A new trail along the now obsolete spur of the Washington-Rochambeau Road located at the eastern edge of the park was considered. The option was dismissed from further consideration because a cultural landscape treatment approach and plan have not yet been developed for the historic road trace. This trails~~

~~plan does not preclude a future trail in this location, should cultural landscape treatment options include visitor use of the trace as a trail.~~

~~o A new connecting trail from Van Buren Road or Mine Road into the park was considered as a means for adding a new access point closer to the town of Dumfries. However, Mine Road to the west of Van Buren Road and Van Buren Road to the south of Mine Road are dead-end roads without sidewalks or parking. This trails plan does not preclude the establishment of future trails in this location, if and when the roadway infrastructure would support trail connections for visitors.~~

Specific Routes for Washington-Rochambeau Road and Van Buren or Mine Roads Access – Several additional trail routes connecting to regional trails and pedestrian system were also considered. In these cases, no specific route was identified due to the need for additional information or planning.

o A new trail within or along the now obsolete segment of the Washington-Rochambeau Road located at the eastern edge of the park was considered. The option was dismissed from further consideration at this time because a cultural landscape treatment plan has not yet been developed for the historic road trace. This trails plan does not preclude a future trail in this location if future cultural landscape treatment options are developed to accommodate visitor use of the trace as a trail, or visitor use adjacent to the historic feature.

o A new connecting trail from Van Buren Road or Mine Road into the park was considered as a means for adding a new access point closer to the town of Dumfries. Connections to local and regional trails infrastructure beyond the park boundary will have to be developed with the Town of Dumfries and Virginia Department of Transportation's (VDOT) support. Additional planning and design among NPS, VDOT, Prince William County, the Town of Dumfries, and other external stakeholders is needed to realize trail connections in this area. Therefore, it was dismissed from consideration in this trails plan.