

## CONSULTATION AND COORDINATION





## PUBLIC MEETINGS, SECTION 106 CONSULTATION, AND INTERAGENCY COORDINATION

### PUBLIC MEETINGS

This *General Management Plan / Environmental Impact Statement* was developed with the participation of governmental agencies, nongovernmental organizations, and members of the public at large. Formal public participation began in March 1996, when the park superintendent sent a letter to more than 800 people and groups on the park's initial mailing list. This letter described the effort to develop a new general management plan for the park and invited all addressees to participate in the project.

The invitation announced the first round of public meetings, to be held at the visitor center on March 18 and 20, 1996, and also included a mail-back comment form. The comment form asked recipients to describe any issues and concerns they had about the park, as well as their ideas for the future of the battlefields. The letter was also posted on the park's Internet site and electronic comments were encouraged. In addition, the meetings were announced in local newspapers, on local television, and in the *Federal Register*.

The first public meetings provided attendees with the opportunity to learn about the planning effort, ask questions, and voice their ideas about the park. The mail-back comment form was also distributed at the public meetings. More than 100 people attended the meetings and more than 250 comment forms and electronic responses were received.

Additional informal meetings were held during this first round of public participation. The project was discussed with groups associated with the park, including the Bull Run Civil War Roundtable and the Battlefield Equestrian Society. The project team also met with groups that expressed interest in specific aspects of the plan, such as the Prince William Bicycle Association, the Friends of Manassas National

Battlefield Park, and the Prince William Wildflower Society.

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

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

To help communicate ongoing planning issues, and encourage further public participation, a newsletter was distributed based on the park mailing list, and anyone expressing interest in the process. The first newsletter, sent in January 1997, re-stated the preliminary goals and alternatives, to make sure they addressed the ideas discussed during the first round of public participation.

On February 10 and 11, 1997, public meetings were held at the park visitor center. As with the first round of public meetings, the meetings were publicized in local papers, and the newsletter and meeting announcement were posted on the park's Internet page. An article was included in the *Civil War News* to encourage participation by the Civil War community. Meeting participants were invited to respond to the goals and help the planning team refine the preliminary alternatives and/or develop new alternatives. Ideas from these meetings and the responses were used to refine the alternatives and develop the draft plan.

As the draft general management plan was being prepared in 1997, the project team continued to meet with interested groups and study the impacts of the alternatives. The National Park Service contracted with Virginia Natural Heritage to study areas identified in the alternatives where woodlands would be removed and the historic field patterns would be rehabilitated to ensure threatened and endangered species would not be impacted. The National Park Service also contracted with Robert Peccia and Associates to supplement the traffic modeling provided by the Virginia Department of Transportation in the U.S. Route 29 study to understand the impacts of relocating through traffic from the park.

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

Public meetings for the Manassas National Battlefield general management plan resumed in 2002 with a public focus group meeting, designed specifically to address issues surrounding transportation and circulation in the park. This meeting occurred on December 5, 2002, with 18 individuals in attendance. A new newsletter was sent to the mailing list in the fall of 2003. A total of 60 written and electronic comments were received.

## SECTION 106 CONSULTATION

Agencies that have direct or indirect jurisdiction over historic properties are required by Section 106 of the National Historic Preservation Act of 1966, as amended (16 *United States Code* 470, et seq.) to take into account the effect of any undertaking on properties eligible for the National Register of Historic Places. To meet the requirements of 36 *Code of Federal Regulations* 800, the National Park Service sent letters to the

Virginia Department of Historic Resources (the state historic preservation office) and the Advisory Council on Historic Preservation, inviting their participation in the planning process. Both offices were sent copies of all project newsletters with a request for comments. The Virginia Department of Historic Resources was invited to all public meetings and was provided with a copy of the *Draft General Management Plan / Environmental Impact Statement*. Their comments are shown in the comment letters later in this section.

Table 5-1 lists the cultural resources present at Manassas National Battlefield Park, the treatment and use of each resource, and the presumed need for any future review by the state historic preservation officer and/or the Advisory Council on Historic Preservation.

## INTERAGENCY COORDINATION

Coordination with federal, state, and local agencies began concurrently with the public information program. Government agencies such as the Virginia Department of Historic Resources, U.S. Fish and Wildlife Service, U.S. Environmental Protection Agency, U.S. Army Corps of Engineers, Virginia Department of Transportation, Virginia Department of Conservation and Recreation, and nearby jurisdictions received the park superintendent's initial letter in March 1996.

These organizations were invited to attend all public meetings. Special briefings were also held with elected officials and staff from Fairfax and Prince William Counties. Throughout the process (from 1996 through the present), government agencies were also invited to participate in a routine series of interagency coordination meetings. The attached letter to the Virginia Department of Historic Resources is one example of the project team's coordination efforts.

In addition, representatives from the park's general management planning team participated in coordination meetings for the Battlefield Bypass study.

**Table 5-1: GMP Actions Requiring Section 106 Compliance**

<b>Alternative A</b>	
<b>General Management Plan Action</b>	<b>Compliance Requirements</b>
Rehabilitate Brawner Farm House, while preserving the structure to accommodate internal visitation and interpretation.	Project underway.
<b>Alternative B</b>	
<b>General Management Plan Action</b>	<b>Compliance Requirements</b>
Move the interpretation of Second Manassas to a visitor contact station at Brawner Farm and accommodate year-round visitation.	Requires further state historic preservation officer (SHPO) and Advisory Council on Historic Preservation (ACHP) review.
Examine options to develop a new entry road and improve parking facilities at Stuart's Hill to minimize the visual impact of the high-voltage transmission lines in that quadrant of the park.	
Request the following boundary adjustments: <ul style="list-style-type: none"> <li>• The 136-acre Davis Tract,</li> <li>• The 43-acre Stonewall Memory Garden Tract,</li> <li>• The 0.75 acre Conservation Trust parcel, and</li> <li>• The 6-acre Dunklin Monument tract.</li> </ul>	No SHPO or ACHP review required.
Rehabilitate the landscape to its wartime appearance: <ul style="list-style-type: none"> <li>• Remove approximately 327 acres of existing forest and manage that land as grassland or open field.</li> <li>• Allow approximately 82 acres of existing grassland and open fields to regenerate to forest through natural succession.</li> </ul>	Requires further SHPO and ACHP review.
Remove the existing Brawner Farm and Battery Heights parking areas along U.S. Route 29.	Requires further SHPO and ACHP review.
Develop the First Manassas automobile/bicycle tour (interpretive materials only—no new roadway needed).	No SHPO or ACHP review required. To be carried out after the completion of the Manassas National Battlefield Park Bypass.
Upgrade trails and interpretive media as needed on the First Manassas Hiking Trail.	Requires further SHPO and ACHP review.
Develop the Second Manassas automobile/bicycle tour (interpretive materials only—no new roadway needed).	No SHPO or ACHP review required. To be carried out after the completion of the Manassas National Battlefield Park Bypass.
Develop the Second Manassas hiking trail by upgrading existing trails, creating new trails, and providing interpretive materials.	Requires further SHPO and ACHP review.
Upgrade the Lucinda Dogan House to accommodate year-round visitation. Rehabilitate the structure's appearance by removing nonconforming structural elements and outbuildings.	Requires further SHPO and ACHP review.

**Table 5-1: GMP Actions Requiring Section 106 Compliance**

<b>Alternative B (Continued)</b>	
<b>General Management Plan Action</b>	<b>Compliance Requirements</b>
Create a “ghosted” outline of the Robinson House ruins.	Requires further SHPO and ACHP review.
Transfer the portions of U.S. Route 29 and VA Route 234 inside the park to NPS jurisdiction and close these roads to non-park traffic:  Remove the existing U.S. Route 29 Bridge over Bull Run, and mark bicycle lanes on primary roads throughout the park.	Requires further SHPO and ACHP review. To be carried out after the completion of the Manassas National Battlefield Park Bypass.
Design and develop a new recreation area off Groveton Road.	Requires further SHPO and ACHP review.
Develop a new equestrian trail near Stuart’s Hill.	Requires further SHPO and ACHP review.
<b>Alternative C</b>	
<b>General Management Plan Action</b>	<b>Compliance Requirements</b>
Construct a new visitor center, parking area, and access roadways to the east of Stone Bridge and Bull Run.	Requires further SHPO and ACHP review.
Remove the existing visitor center at Henry Hill.	Requires further SHPO and ACHP review.
Develop interpretive displays at Brawner Farm (a less extensive action than in Alternative B). Examine options to develop a new entry road and improve parking facilities at Stuart’s Hill to minimize the visual impact of the high-voltage transmission lines in that quadrant of the park.	Requires further SHPO and ACHP review.
Request the following boundary adjustments: <ul style="list-style-type: none"> <li>• The 136-acre Davis Tract,</li> <li>• The 43-acre Stonewall Memory Garden Tract,</li> <li>• The 0.75 acre Conservation Trust parcel, and</li> <li>• The 6-acre Dunklin Monument tract.</li> </ul>	No SHPO or ACHP review required.
Upgrade key interpretive sites throughout the park for moderate to high visitor use. Sites include Brawner Farm, Chinn Ridge, Deep Cut/Unfinished Railroad, Groveton, Henry Hill, Matthews Hill, Portici, Sudley, Stone Bridge, and Stone House. <ul style="list-style-type: none"> <li>• Develop extensive interpretive materials at each site.</li> <li>• Upgrade parking facilities and loop trails at each site.</li> </ul>	Requires further SHPO and ACHP review.

**Table 5-1: GMP Actions Requiring Section 106 Compliance**

<b>Alternative C (Continued)</b>	
<b>General Management Plan Action</b>	<b>Compliance Requirements</b>
Using existing trails, develop two separate 5-mile-long hiking trails for the Battles of First and Second Manassas.	No SHPO or ACHP review required.
Restore important wartime view corridors by removing approximately 72 acres of existing forest and managing that land as grassland or open field.	Requires further SHPO and ACHP review.
Remove the modern residence and outbuildings from the Groveton area.	Requires further SHPO and ACHP review.
Upgrade the Lucinda Dogan House to accommodate year-round visitation. Rehabilitate the structure's appearance by removing nonconforming structural elements and outbuildings.	Requires further SHPO and ACHP review.
Remove the existing Brawner Farm and Battery Heights parking areas along U.S. Route 29.	Requires further SHPO and ACHP review.
<p>Transfer the portions of U.S. Route 29 and VA Route 234 to NPS jurisdiction and close these roads to non-park traffic:</p> <ul style="list-style-type: none"> <li>• Construct a new bridge and approach roads to the south of the existing bridge's location.</li> <li>• Remove the existing U.S. Route 29 Bridge over Bull Run.</li> <li>• Install access control facilities at the park's remaining entrances along U.S. Route 29 and VA Route 234. Special provisions would be made for in-holders and their guests and service providers, and for emergency vehicles.</li> <li>• Remove signalization, turn lanes, and excess pavement from the intersection of U.S. Route 29 and VA Route 234.</li> <li>• Reduce speed limits to 25 miles per hour.</li> <li>• Designate and mark bicycle lanes on primary roads throughout the park.</li> </ul>	Requires further SHPO and ACHP review. To be carried out after the completion of the Manassas National Battlefield Park Bypass.
Design and develop a new recreation area off Groveton Road.	Requires further SHPO and ACHP review.
Develop a new equestrian trail near Stuart's Hill.	Requires further SHPO and ACHP review.



IN REPLY REFER TO:

## United States Department of the Interior

### NATIONAL PARK SERVICE

Manassas National Battlefield Park

12521 Lee Highway

Manassas, Virginia 20109-2005

August 11, 2004

Ms. Kathleen S. Kilpatrick, Director  
Department of Historic Resources  
Commonwealth of Virginia  
2801 Kensington Avenue  
Richmond, Virginia 23221-2470

Subject: General Management Plan for Manassas National Battlefield Park, Virginia

Dear Ms. Kilpatrick:

The National Park Service continues to work toward the completion of a draft General Management Plan/Environmental Impact Statement (GMP/EIS) for Manassas National Battlefield Park. A general management plan, as you know, determines the best course of management for each park, based on the park's purpose and significance, the interrelationships that exist among the park's resources and values, the range of public interests, knowledge of best practices, and other factors. This approach helps ensure that the decisions made through general management planning are widely supported and sustainable over time. The draft GMP/EIS being developed for Manassas National Battlefield Park will guide decision making at the park for the next 15-20 years.

To date, the park's draft GMP/EIS contains three alternatives, including a no-action alternative. These are Alternative A, *Continuing Current Management Practices*, which is the no-action alternative; Alternative B, *The Two Battles of Manassas – A Comprehensive Understanding of Each Battle*, which is the alternative preferred by the National Park Service; and Alternative C, *The Defining Moments of the Battles – An Understanding of the Principal Events*. Later this year, a copy of the document will be submitted to you for your review and comment, in accordance with stipulation VI., E of the 1995 *Programmatic Agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers*.



Your comments and concerns are important in determining the future of Manassas National Battlefield Park. Because this general management plan has been under development for several years, I would be happy to arrange a time for you and members of your staff to tour the park and become reacquainted with the many issues affecting the park. If you would like to arrange such a meeting, or if you have any questions or concerns, please contact me at the above address, e-mail me at [Robert\\_Sutton@nps.gov](mailto:Robert_Sutton@nps.gov), or telephone me at 703-754-1861.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert K. Sutton". The signature is written in a cursive, slightly slanted style.

Robert K. Sutton  
Superintendent

## RESPONSES TO COMMENTS

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

During the public comment period, 28 comments were received from 28 state and federal agencies, organizations, and individuals. In general, respondents supported the management efforts described in the *Draft General Management Plan / Environmental Impact Statement*. The six respondents who expressed a preference supported the implementation of alternative B. Specifically respondents expressed support for reducing traffic flow within the park and improving the visitor experience. One respondent also noted that alternative B would provide benefits for wildlife, particularly birds.

One respondent expressed a preference for the no-action alternative. The Environmental Protection Agency supported the no-action alternative with construction of the Battlefield Bypass.

The Virginia state historic preservation officer has indicated her support for alternative B, the preferred alternative, as modified in this final plan. The Virginia office of the U.S. Fish and Wildlife Service agrees that the actions proposed in the *General Management Plan* would not adversely affect federally listed species or federally designated critical habitat because no federally listed species are known to occur in the project area. Please see appendix E for additional information.

The National Environmental Policy Act requires the National Park Service to respond to substantive comments. Substantive comments are those that (1) question the accuracy of the information/data provided, (2) question the adequacy of the environmental

analysis, (3) present reasonable alternatives to those presented in the draft document, or (4) cause changes or revisions in the preferred alternative.

Most of the comments received referred to actions in the park that are part of daily operations or would be relevant during implementation of the actions proposed in this plan. These comments addressed topics such as automobile tour routes, alternative transportation planning, park signs, trail improvements, battle reenactments, and landscape rehabilitation in specific locations. Because a general management plan is a programmatic document designed to provide guidance in relation to park management goals and how to achieve desired future conditions, issues related to the daily management of the park are not directly addressed in a general management plan. Most of these comments will be considered during planning and implementation of the proposed actions.

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

Several respondents on the *Draft General Management Plan / Environmental Impact Statement* included comments relevant to the Manassas National Battlefield Park Bypass Study. These comments have not been addressed, as they are outside the scope of the *General Management Plan / Environmental Impact Statement*. Fairfax County also expressed concern regarding other transportation issues connected to the closure of U.S. Route 29 to commuter and commercial truck traffic. Because these issues involve transportation impacts outside the park, these issues are beyond the scope of this document and will be addressed as part of the Battlefield

Bypass environmental impact statement. Additional information related to the Battlefield Bypass can be found at <http://www.battlefieldbypass.com>

## COMMENTS THAT RESULTED IN A CHANGE TO THE FINAL DOCUMENT

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

Implementation of the action alternatives proposed in this *General Management Plan / Environmental Impact Statement* would be unlikely to have a greater than minor impact on surrounding land uses outside the park boundary. The development of a new visitor center on the eastern boundary of the park is not part of the preferred alternative. If, in the future, the National Park Service determines that development of a new visitor center would be beneficial to management of Manassas National Battlefield Park, additional planning and environmental compliance would be completed as necessary.

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

Fairfax County also expressed concern about emergency access.

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

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

The environmental impacts and costs of the new access road and bridge are addressed in this document (see the “Environmental Consequences” section and appendix D) because these facilities would be within park boundaries. However, because these changes are related to mitigation measures associated with the Battlefield Bypass study, implementation of these actions would occur in conjunction with the development of the Battlefield Bypass.

The Coalition for Smarter Growth suggested that consideration should have been given to an action alternative that did not include the construction of a bypass around the park. The National Park Service has determined that such an alternative would be contrary to a Congressional mandate and the management goals for Manassas National Battlefield Park. The National Park Service believes an adequate range of alternatives was considered in the *Draft General Management Plan /*

*Environmental Impact Statement.* Additional text has been developed to clarify the matter and is included under the heading “Alternative Considered but Eliminated from Further Analysis” in the “Alternatives, including the Preferred Action” chapter of this document.

## OTHER COMMENTS RECEIVED

The National Park Service received a number of comments that did not result in changes to the final document. These comments are addressed here in an effort to clarify how issues related to management of the park.

Several respondents suggested developing additional roads to increase visitor access to resources in the park, particularly for visitors with limited mobility. The National Park Service is committed to providing visitors with appropriate access and an opportunity to experience park resources in accordance with the Architectural Barriers Act Accessibility Standards (ABAAS).

Many of the venues in the park are currently accessible to visitors with limited mobility. In developing and implementing this *General Management Plan*, the National Park Service must strike a balance between important but sometimes conflicting resources or values. For example, when developing the alternatives, the park staff had to weigh the tradeoffs between the preservation and protection of the park’s cultural and natural resources; the enhancement of visitor experience and safety, including accessibility; and the park’s operational concerns.

Virtually the entire park is within the cultural landscape, as reflected in the management zoning for the action alternatives. Hence, the character of the battlefield could be diminished if more areas of the battlefield were made accessible. While it is unlikely that additional roads would be developed, the park staff would consider ways to improve accessibility to buildings and structures and the landscape in the park while minimizing impacts to park resources.

Several respondents made comments relative to management of specific resources. These included wetlands and other habitats, and the management of fire and hazardous resources. The importance of the habitat (including wetlands) in the park has increased over time as the region had become more developed. Management of these important resources must be balanced with the purpose and significance of the park as a battlefield. The National Park Service would continue to consult with federal, state, and local agencies, as appropriate, during implementation of this plan to minimize any adverse impacts associated with the proposed action on natural resources in the park. In addition, implementation of this plan does not change management actions related to fire management, which are guided by the park’s fire management plan. Similarly, the National Park Service will continue to comply with appropriate laws and policies relative to management of hazardous materials. No actions under this plan would change the park’s current management practices in either of these areas.

Commenters were generally supportive of the landscape rehabilitation measures proposed in the general management plan. Some concern was expressed by the Environmental Protection Agency, the Virginia Department of Game and Inland Fisheries, and Virginia Department of Conservation and Recreation over the total acreage of forested area to be cut under the preferred alternative. These entities provided detailed comments related to specific proposed timber cuts.

The general management plan is a programmatic level document and these comments go beyond the scope of the document. The National Park Service recognizes that the park contains important woodland habitat. Management actions related to natural resources in the park must be balanced with the park mission. Based on previous projects, the National Park Service believes it can successfully meet goals relating to restoration of the battlefield landscape of the park while protecting the important

natural resources of the park. For example, the National Park Service consulted with the Department of Conservation and Recreation, Division of Natural Heritage regarding timber cuts to reestablish historic sight lines on the Brawner Farm. This consultation enabled the National Park Service to preserve two timber stands identified as pristine woodland by the Division of Natural Heritage. The proposed cuts are the minimum necessary to achieve the park goal of reestablishing these lines for visitor understanding of the evolution of the battle. The National Park Service would continue to work with the Division of Natural Heritage and other state and local government entities as necessary during implementation of this *General Management Plan*.

Other reviewers expressed concern over the potential impacts of the closures of VA Route 234 and U.S. Route 29 prior to the development of the bypass. As stated in alternative B, the preferred alternative, these roads would remain open to through traffic until a Battlefield Bypass was complete. Once the bypass was complete, the National Park Service would assume management of these roads. The speed limit on the non-bypass VA Route 234 and U.S. Route 29 would be reduced at that time to enhance visitor experience and safety in the park.

Under the preferred alternative, the National Park Service proposes to install entrance stations to control access into the park. As noted in the *Draft General Management Plan / Environmental Impact Statement*, the National Park Service would continue to work with residents in the park who could be affected by installation of the entrance stations.

One respondent noted that the new visitor center at Stone Bridge proposed under alternative C should also be included under alternative B because it would “greatly increase the visual and physical enhancement and understanding of both battles.” The visitor center proposed under alternative C was not included under alternative B because of the associated costs. The benefits from an interpretative standpoint do not offset the

costs associated with the new building (appendix D).

Several reviewers expressed opposition to removing the modern bridge on U.S. Route 29 at the east end of the park and building a new bridge farther downstream. The National Park Service believes that a new bridge would benefit the cultural resources in the park by removing the modern structure from a site that played a key role in the Battles of First and Second Manassas. In addition, removal of the bridge would allow for more complete interpretation of the site and would enhance visitor experience and safety in the area.

The environmental impacts and costs of the new access road and bridge have been addressed here because these actions would occur within park boundaries. However, because these changes are related to mitigation measures within the Battlefield Bypass study, implementation of these actions would occur in conjunction with the Battlefield Bypass.

One respondent questioned the validity of the park’s estimate of the number of people who visit the battlefield on an annual basis. The estimates cited in this plan were calculated by the Public Use Statistics Office, which coordinates visitor counting protocols systemwide and provides visitation statistics for areas administered by the National Park Service. The estimates are calculated based on park-specific information and are collected in several ways. Park staff count the actual number of people who enter the visitor center on a daily basis. This count reflects both visitors who pay an entrance fee as well as school groups, children under age 16, and annual pass holders who do not pay an entrance fee. The park also has several traffic counters located on roads leading to trailheads to track recreational use by hikers, joggers, horse trail users, and other individuals who visit the park throughout the year without entering the main visitor center. When the visitor use statistics are calculated, the National Park Service model is able to account for vehicles that enter and exit from the same gate as well as the possibility of multiple people in the same vehicle. In this way

## CONSULTATION AND COORDINATION

the visitation estimates include both one-time visitors and repetitive seasonal visitation. The needs of both groups are addressed in the final general management plan.

Following are reproductions of the comment letters received that included substantive comments or those received from federal agencies and state or local governments.

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PAGE 02/03



# COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.  
Secretary of Natural Resources

**Department of Historic 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

July 14, 2006

Robert K. Sutton, Superintendent  
United States Department of the Interior  
National Park Service  
Manassas National Battlefield Park  
12521 Lee Highway  
Manassas, Virginia 20109

Re: Draft General Management Plan/Environmental Impact Statement  
Manassas National Battlefield Park  
DHR File Number 2004-1264

Dear Mr. Sutton:

I appreciate your taking the time today to explain the need for a modification to the Park's preferred alternative, Alternative B, as presented in the Draft General Management Plan/Environmental Impact Statement, as a result of the Resolution of the Commonwealth Transportation Board (CTB) dated June 15, 2006. We have previously expressed to you our support for Alternative B, which we agree best fits the Park's mission of interpretation. This letter provides our strong support for the Park's selection of Alternative B, modified.

We are very pleased to learn that the CTB has approved closing Routes 29 and 234 through the Park and the transfer of seven miles of road to National Park Service jurisdiction, upon the completion of the Manassas National Battlefield Park Bypass and any other necessary transportation system improvements. We understand, however, that this approval is subject to certain conditions, among them that any closure would provide for the reopening of Routes 29 and 234 to through traffic in certain emergency situations. To accomplish this goal a new bridge over Bull Run and approach roads will need to be constructed as described in Alternative C. The park's preferred alternative then can be described as a combination of Alternatives B and C.

I would like to take this opportunity to reiterate our appreciation for the care and thoroughness with which the Draft General Management Plan has been prepared. From a compliance perspective we particularly appreciate Table 5-1 and the attention given to future studies. For example, the draft states that the Park would rehabilitate the battlefield and cultural landscape to the greatest extent feasible through best management practices. This process would be preceded by preparation of a

Administrative Services  
10 Courthouse Avenue  
Petersburg, VA 23803  
Tel: (804) 863-1624  
Fax: (804) 862-6196

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

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

Roanoke Region Office  
1030 Penmar Ave., SE  
Roanoke, VA 24013  
Tel: (540) 857-7585  
Fax: (540) 857-7588

Winchester Region Office  
107 N. Kent Street, Suite 203  
Winchester, VA 22601  
Tel: (540) 722-3427  
Fax: (540) 722-7535

cultural landscape report. We are confident that any such clearing will be balanced with the concerns expressed by the natural resource agencies for the current plant and animal communities and vistas opened judiciously to balance both types of resources.

We look forward to receiving the revised maps showing the modified Alternative B. If you have any questions concerning our comments, please do not hesitate to contact me at (804) 367-2323, ext. 112; fax (804) 367-2391; e-mail [ethel.eaton@dhr.virginia.gov](mailto:ethel.eaton@dhr.virginia.gov).

Sincerely,



Ethel R. Eaton, Ph.D., Manager  
Office of Review and Compliance

- c. Ray Brown, Cultural Resource Management Specialist  
Erin Flanagan, Community Planner



02/28/2006 08:51 FAX 703 754 1107

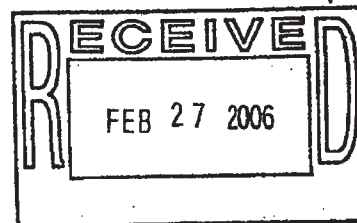
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

February 23, 2006



*Handwritten notes:*  
m... to  
E...  
2/28

Mr. Robert K. Sutton  
Superintendent  
Manassas National Battlefield Park  
12521 Lee Highway  
Manassas, Virginia 20109-2005

**Re: Manassas National Battlefield Park Draft General Management Plan/Environmental Impact Statement (CEQ # 20050543)**

Dear Mr. Sutton:

In accordance with the National Environmental Policy Act of 1969 and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan/Environmental Impact Statement (GMP/EIS) for the Manassas National Battlefield Park. As a result of this review, EPA has assigned this Draft Environmental Impact Statement (DEIS) a rating of EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of the project. EPA is primarily concerned with the impacts to vegetation and wildlife, wetlands, transportation, and the local community. A copy of EPA's ranking system is enclosed for your information.

EPA understands that the purpose of the GMP/EIS is to ensure resource preservation and enhanced visitor experience at the Manassas National Battlefield Park. The National Park Service (NPS) proposed three alternatives in the GMP/EIS to provide a framework for decision making on visitor use and management of natural and cultural resources and development; they are: Alternative A (No Action), Alternative B (Preferred Alternative--The Two Battles of Manassas), and Alternative C (Defining Moments of the Battles of Manassas).

Alternative A is a continuation of current management direction and trends at the park and serves as a baseline measurement for comparing the resource conditions and visitor experience prescribed by the two alternatives. Alternative B focuses on interpreting the two battles of Manassas as distinct military events to provide a comprehensive understanding of each battle. This would involve two separate visitor areas, the Henry Hill Visitor Center and the Stuart's Hill Visitor Contact Station; removal of U.S. Route 29 Bridge over Bull Run; addition of controlled access facilities at the park's three remaining entry points; separate, chronological, sequential auto and bicycle tours would be developed for each battle; removal of approximately 327 acres of forested habitat; possibly moving all interpretation of the Second Manassas Battle to an expanded facility at Brawner Farm in the future. Alternative C focuses on the interpretation of the general events of the battles to allow for an understanding of the principal events by

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encouraging visitors towards one major visitor center and multiple interpretive sites. This would entail removal of the existing Henry Hill Visitor Center; proposed construction of a new visitor center near Stone Bridge; removal of existing U.S. Route 29 Bridge over Bull Run and construction of a new bridge over Bull Run and associated access roads which poses impacts to Bull Run, its floodplain, and associated wetlands; and removal of 72 acres of forested area.

EPA would like to comment on the GMP/EIS and Alternative A (No Action). Although it is understood that Alternative A serves primarily as a baseline from which the other two action alternatives are compared, EPA is concerned that the No Action alternative does not adequately anticipate the planned closure of U.S. Route 29 and VA Route 234. In particular, Alternative A assumes that the main roads within the park (U.S. Route 29 and VA Route 234) would remain open to commuter and truck traffic. However, concurrent with this GMP/EIS effort, the Federal Highway Administration and the National Park Service have completed the Manassas National Battlefield Park Bypass Draft Environmental Impact Statement (Bypass Study). Regardless of the specific alignment selected, the bypass will allow for the eventual closure of U.S. Route 29 and VA Route 234 within the park to through traffic. As a result, Alternative A does not assume the presence of a finished Battlefield Bypass which would result in the closure of U.S. Route 29 and VA Route 234. Thus, if Alternative A (No Action) is the selected alternative, EPA questions whether it fully addresses the impacts associated with the closure of these roads through the park. Conversely, an Alternative A (with road closures) would be an environmentally preferred alternative compared to the proposed action alternatives as it would eliminate significant environmental impacts.

The following comments are offered for your consideration. They reflect the impacts associated specifically with Alternative B (preferred alternative) and are also applicable to Alternative C.

### **Vegetation and Wildlife**

As described in Alternative B (the preferred alternative), rehabilitation of portions of the historic landscape would result in the phased removal of approximately 327 acres of second growth forest, which would be converted to open fields. The specific terrestrial species removed as well as its location should be depicted on a map—specifically, those rare and significant habitats that occur in Manassas National Battlefield Park as identified on page 83 (upland depression swamp forest, oak-hickory forest, eastern white pine forest, and piedmont mountain swamp forest).

It is noted on page 115 that “The clearings will be maintained using a variety of potential methods, including mechanical methods as well as prescribed fire.” The DEIS should discuss exactly where the prescribed fires would occur, provide a description of the surrounding areas (in particular, identify proximity to privately held lands), and provide safety precautions as well as the frequency of method necessary to maintain the cleared areas.

The DEIS does not clearly address whether the new Visitor Contact Station planned at the Brawner Farm in the future (under Alternative B) would involve tree clearing. Could this action affect the historic woodlot, known as Brawner Woods or Gibbon's Woods? If so, the approximate acres of tree clearing could be underestimated in the DEIS. If the approximate 327 acres of forested removal includes this area, it should be stated in the FEIS. If not, the FEIS should estimate the total quantity of trees proposed for removal as well as identify the types of trees affected. It is also suggested that Brawner Farm be depicted on Map 4-1 (Proposed Forest Cuts and Reforestation Sites).

The DEIS states that approximately 82 acres of open fields would be allowed to regenerate through natural succession back to oak-hickory forest. It is assumed that the areas identified on Map 4-1 as "Proposed Reforestation (Alternative B)" represent the 82 acres allowed for tree regeneration. If different, please indicate so. Thus, the total acreage of tree removal is approximately 245 acres (unless Brawner Farm needs to be added). It is suggested that the NPS plant the oak-hickory trees on the 82 acres to speed up the reforestation rather than wait for tree regeneration.

Removal of the forested area would impact interior trees. As a result, these existing interior trees become new "edge" trees. Exposure to root damage from clearing activity and their "top-heaviness" combined with their newly unprotected condition, could cause them to be susceptible to wind damage. This factor could contribute to tree mortality. Thus, the potential to lose even more forested resources exists. The NPS should address this issue and take measures to observe the newly formed "edge" trees as well as to propose to mitigate for any additional losses incurred. The impact to interior forest areas also impacts sensitive species that inhabit these areas. The wildlife that are accustomed to interior forest habitat are now at risk. It is suggested that the NPS address this impact to affected wildlife.

It is recommended that a complete description of the terrestrial habitat resources in the study area and its location in the park be provided. The composition and characteristics of each community type should be summarized and the functions and total acreage indicated. In addition, the species should be mapped relative to habitat locations and species density. To determine the baseline value of the habitat and the severity of the potential impacts from the proposed alternatives, EPA recommends that a baseline Habitat Evaluation Procedure (HEP) be completed on the study area using the U.S. Fish and Wildlife Services's Habitat Evaluation Procedure. When the impacts of the wildlife and terrestrial habitat are unavoidable, the HEP will help to determine the type of mitigation measures which would be considered appropriate for the potential impacts.

The DEIS did not address forest mitigation. Because of the considerable amount of forest habitat removed, EPA suggests that mitigation be addressed in the FEIS. The FEIS should also include an analysis for forest fragmentation specifically associated with Alternative B. The analysis should also include potential impacts on species with wide home ranges. Measures to avoid potentially adverse impacts to these resources should be evaluated and implementation and

mitigation plans to minimize impacts should be developed. Specifically, the FEIS should address whether the build alternatives could be implemented with no or partial forest clearing and still meet the purpose and need. Where such impacts cannot be avoided, adequate compensation developed through habitat assessment should be implemented. A mitigation plan is recommended to address the loss of forested resources.

As noted on pages 54 and 63, a boundary adjustment to the park would be necessary for Alternatives B and C to include four tracts of land: The Davis Tract, The Stonewall Memory Garden Tract, The Conservation Trust Parcel, and the Dunklin Monument Tract. The DEIS should identify these four tracts on Maps 2-3 and 2-5. These areas should be described more fully as well as address and consider the potential for forest mitigation within these boundaries, if feasible.

The DEIS states that to minimize the environmental impact of the tree clearings proposed for Alternatives B and C, the NPS would employ best management practices for each phase of the clearings." The best management practices should be described in the FEIS.

#### **Wetlands**

It is stated in the DEIS that the new bridge and access road proposed in Alternative C would have to cross and impact Bull Run, its floodplains, and associated wetlands which would be far greater than the impacts to natural resources impacted by Alternative B, specifically forest removal. The EIS should quantify the number and kind of wetlands at risk as well as analyze the functional values of impacted wetlands to support its claim and compare the natural resources impacted between the two action alternatives. It appears that some of the forest area to be cleared may also contain forested wetlands. If this is true (or not) the issue should be discussed in the FEIS.

#### **Transportation/Local Community**

The proposed action alternatives presume a future where the Battlefield Bypass is in place, and park roads (U.S. Route 29 and VA Route 234) are closed to through traffic and are **used primarily for park purposes**. The FEIS should include within the Transportation Section Map F-1: Bypass Study Alternative to show where the U.S. Route 29 and VA Route 234 bypass alternatives are and disclose and discuss the impacts to the park resources from each alternative. Since the closing of U.S. Route 29 and VA Route 234 are essential to both action alternatives, the FEIS should also discuss the costs and impacts of this action.

In reference to Alternative B (and Alternative C), removal of the U.S. Route 29 bridge over Bull Run, page 143 states that "Only a few residents would experience an inconvenience from having to use an alternative route, and the additional traveling distance would be less than 5 miles." The FEIS should quantify the number of residents that would be inconvenienced. In addition, "Impacts of this closure to residents living outside of the park are discussed in the

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Bypass Study.” It would be helpful if the FEIS provided a brief synopsis of the impact to residents living outside of the park as well as a general overview of public opinion to have a better understanding of the impact to the local community.

**Miscellaneous**

On Page 64 under ESTIMATED COSTS, the text reads “Alternative B would cost....” However, the text should read “Alternative C” instead of Alternative B since the discussion refers to Alternative C.

Page 130, third paragraph, states that “Prior to the relocation of the existing visitor center at Henry Hill....” Relocation of Henry Hill is proposed for Alternative C not Alternative B. The discussion in this section refers to Alternative B.

Thank you for the opportunity to review and comment on this project. If you need additional assistance, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



William Arguto  
NEPA Team Leader

Enclosure



**Environmental Impact Statement (EIS) Rating System Criteria****RATING THE ENVIRONMENTAL IMPACT OF THE ACTION**

**LO (Lack of Objections)** - The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.

**EC (Environmental Concerns)** - The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.

**EO (Environmental Objections)** - The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:

1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard;
2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise;
3. Where there is a violation of an EPA policy declaration;
4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or
5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

**EU (Environmentally Unsatisfactory)** - The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:

1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis;
2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or
3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies.

**RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)**

**1 (Adequate)** - The draft EIS adequately sets forth the environmental impacts(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**2 (Insufficient Information)** - The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.

**3 (Inadequate)** - The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.



## COMMONWEALTH of VIRGINIA

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March 7, 2006

Robert K. Sutton, Ph.D.  
Superintendent  
Manassas National Battlefield Park  
National Park Service  
12521 Lee Highway  
Manassas, Virginia 20109

RE: Manassas National Battlefield, Draft General Management Plan/  
Environmental Impact Statement  
DEQ-06-031F

Dear Dr. Sutton:

The Commonwealth of Virginia has completed its review of the above Draft General Management Plan/Environmental Impact Statement (hereinafter "Draft Plan/EIS"). The Department of Environmental Quality 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. The Department is also the lead agency for coordinating Virginia's review of federal consistency determinations prepared pursuant to the Coastal Zone Management Act and the Virginia Coastal Resources Management Program. The following state agencies, regional planning district commission, and locality participated in this review:

Department of Environmental Quality (hereinafter "DEQ")  
Department of Game and Inland Fisheries  
Department of Agriculture and Consumer Services  
Department of Conservation and Recreation  
Department of Transportation  
Marine Resources Commission  
Department of Aviation  
Virginia Outdoors Foundation  
Northern Virginia Regional Commission  
Fairfax County.

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In addition, the Department of Historic Resources and Prince William County were invited to comment.

### Description of Action

The National Park Service has prepared a plan to guide management of the Manassas National Battlefield Park for the next 15-20 years. The Draft Plan and EIS analyze three alternatives:

- Alternative A, status quo management (Draft Plan/EIS, pages 32, 37-44).
- Alternative B focuses on interpreting the two Battles of Manassas as distinct military events. The visitor center at Henry Hill would orient visitors to the Park as a whole while focusing on the First Battle of Manassas. A separate visitor center will focus on the Second Battle of Manassas (Draft Plan/EIS, pages 45-54). In addition, the existing U.S. Route 29 bridge over Bull Run would be removed, while the portions of U.S. Route 29 and State Route 234 within the Park would be transferred to the Park Service and their access restricted (Draft Plan/EIS, page 53).
- Alternative C focuses on the "watershed" events of the battles, using one major visitor center and multiple interpretive sites. A new visitor center would be constructed near Stone Bridge, and the visitor center at Henry Hill would be removed (Draft Plan/EIS, pages 55-64). In addition, the existing U.S. Route 29 bridge over Bull Run would be removed and replaced at a new location, while the portions of U.S. Route 29 and State Route 234 within the Park would be transferred to the Park Service and their access restricted (Draft Plan/EIS, page 62).

Alternative B is identified as the preferred alternative and also the environmentally preferable alternative (Draft Plan/EIS, pages 65-66).

Copies of the document were provided to us by the National Park Service's Denver Service Center.

### Environmental Impacts and Mitigation

*1. Natural Heritage Resources.* The Department of Conservation and Recreation has searched its Biotics Data System for occurrences of natural heritage resources in the Park. "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.



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(a) *Mapping and Inventory.* The Department of Conservation and Recreation (DCR) has conducted extensive biological and vegetation inventories at Manassas National Battlefield Park, and its understanding of natural communities has increased greatly since the 1997 inventory. The forest communities of the Park were inventoried and mapped in 2002, and vegetation of the entire Park is being mapped as part of the NCR (National Capital Region) Parks Vegetation Mapping Project.

In regard to the discussion in the Draft Plan/EIS of rare, threatened, and endangered species and natural communities (page 83), additional occurrences of significant natural communities (acidic oak-hickory forest, basic oak-hickory forest, upland depression swamp) and an additional occurrence of the state-listed rare plant *Stachys pilosa* var. *arenicola* will soon be entered into the Virginia Natural Heritage Program data base. This update results from additional inventory work during the NCR Parks Vegetation Mapping Project.

(b) *Consultation.* The Department of Conservation and Recreation's Division of Natural Heritage wishes to provide input to the Park on areas where changes in vegetative cover are proposed, as well as recommended plantings. See "Regulatory and Coordination Needs," item 6, below.

(c) *Concerns and Recommendations.* The Department of Conservation and Recreation (DCR) expresses several concerns relative to different areas of activity under Alternative B.

(i) *Stuarts Hill/Cundiff House Forest Cut Area.* The forested upland depression swamp, containing an occurrence of Marsh hedgenettle, (*Stachys pilosa* var. *arenicola*), are located at the east foot of Stuarts Hill in the ecotone between the forest that is proposed for removal and the open fields. DCR recommends avoiding harvest of the wooded depression with Marsh hedgenettle, to keep the community intact. This cut needs to be planned to protect this community and rare plant population, as well as to provide ample buffer to militate against invasion of weeds that will become rampant in this area following canopy removal.

(ii) *Forest Cut Area south of Route 29 and Battery Heights.* DCR has major concerns about the direct and/or indirect impacts of this forest removal on an Upland Depression Swamp occurrence located either within or immediately adjacent to the cut (the map is too coarse-scaled to tell). This community needs to be protected with an ample buffer provided between the clearcut area and both the wetland and an old, fine example of Basic Oak-Hickory Forest.

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(iii) *Henry Hill/Chinn Branch Forest Cut Area*. DCR has some concerns about this cut that were provided to the Park in its 1997 Natural Heritage Inventory report. Park Service data provided to DCR's Natural Heritage Program indicates that at least some of the area lying between the loop road and the ravine on the east side of Chinn Branch was forested during the Civil War. However, the precise boundary between historical and non-historical forest could not be determined, either from the map provided or through field reconnaissance. The slopes in this area are rather steep and the quality of the Acidic Oak-Hickory Forest is good. Therefore, DCR recommends that this hardwood stand be excluded from that cut.

(iv) *Brawner Farm/Deep Cut Forest Cut Area*. DCR's Division of Natural Heritage has already provided extensive comments and consulted with the Park on this project (see, *inter alia*, the Commonwealth's comments on the Park Service's EA for the Brawner Farm/Deep Cut project, DEQ-05-276F, comments mailed November 29, 2005). Restoration of native Piedmont Prairie vegetation would be highly desirable in this area following forest removal, and should benefit the occurrence of the rare plant Buffalo clover, (*Trifolium reflexum*). DCR also recommends strict adherence to erosion and sediment control practices, since these are critical to protecting Appalachia quillwort (*Isoetes appalachiana*) found in small streams of this area.

(d) *Natural Heritage Species, by Cut Area*. Additional information on natural heritage species found in the proposed cut areas of Alternative B is provided as follows, by the Department of Conservation and Recreation.

(i) *Stuarts Hill/Cundiff House*. Marsh hedgenettle can be found, typically in the western region of the U.S., and adventives eastward. Known to have hairs on the stem, leaves are distinctly longer about 2-4 cm wide, shaped as lance-ovate or broadly oblong to ovate, but scarcely stouter than those of the sides (Cronquist & Gleason, 1993).

(ii) *Forest Cut Area south of Route 29 and Battery Heights*. Typically thinly forested, upland depression swamp communities occur in seasonally flooded upland areas on hardpan soils in the Piedmont region (Van Alstine et al, 1999). The forest canopy is usually dominated by willow oak (*Quercus phellos*) and overcup oak (*Quercus lyrata*), the presence of which often indicates mafic substrates. Other frequent trees are red maple (*Acer rubrum*) and sweet gum (*Liquidambar straciflua*). The shrub and herb layers are typically sparse but may include species such as possum haw (*Ilex decidua*), greenbriar (*Smilax rotundifolia*), sedges (*Carex*) and *Sphagnum* species (Schafale and Weakley, 1990). The composition of this rare community type is maintained by its

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hydrology; therefore, anything that alters the natural hydrology of the area is a serious threat to upland depression swamp communities.

Occurring primarily in the Piedmont region, basic oak-hickory forest communities are found on dry to dry-mesic slopes, ridges, and upland flats on circumneutral soils rich in base cations, particularly calcium and/or magnesium (Schafale and Weakley, 1990). As the name implies, oaks (*Quercus* spp.) and hickories (*Carya* spp.) are the dominant tree species, forming open to semi-open canopy conditions. As with most communities on basic soils, the understory, shrub and herbaceous layers tend to be very species-rich with many basicophiles represented (Van Alstine et al, 1999). Typical species include eastern red bud (*Cercis canadensis*), American hazelnut (*Corylus americana*), American holly (*Ilex opaca*), flowering dogwood (*Cornus florida*), eastern hop-hornbeam (*Ostrya virginiana*), limestone goldenrod (*Solidago sphacelata*), wild hydrangea (*Hydrangea arborescens*), and Virginia creeper (*Parthenocissus quinquefolius*), among many others. Threats to occurrences of basic oak-hickory forest communities include logging, development, and infestation by the gypsy moth (Fleming et al., 2005).

(iii) *Henry Hill/China Branch Forest Cut Area*. Acidic Oak-Hickory Forests are ecologically intermediate between species-rich Basic Oak-Hickory Forests and floristically depauperate Oak/Heath Forests. They occupy less fertile soils and have lower species richness and more ericaceous shrubs than do Basic Oak-Hickory Forests. They are distinguished from Montane Oak-Hickory Forests by their restriction to low-elevation or submontane habitats and corresponding composition consisting mostly of species that do not occur at higher elevations. Many contemporary stands of Acidic Oak-Hickory Forests are suffering from the effects of fire exclusion, including poor oak recruitment and the invasion of understories by fire-intolerant mesophytic species such as red maple (*Acer rubrum*), American beech (*Fagus grandifolia*), and blackgum (*Nyssa sylvatica*) (Fleming, et al, 2005).

(iv) *Brawner Farm/Deep Cut Forest Cut Area*. Buffalo clover, a state-listed rare herb, typically inhabits open woods, openings and roadsides (Radford, et al, 1968). In Virginia, buffalo clover is currently known in three locations in the coastal plain and piedmont regions.

Appalachia quillwort is widely distributed in the eastern United States, although it appears to be most frequently found at lower to middle elevation areas of the Appalachian Mountains in Pennsylvania. This plant is found to be emergent in aquatic habitat, shallow water of lakes ponds, and river shores.

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Leaves tend to extend to 30 cm long. Megaspores irregularly reticulate with more or less uneven ridges (Rhoads & Block, 2000).

*2. Threatened or Endangered Plant and Insect Species.* Under a Memorandum of Agreement between DCR and the Department of Agriculture and Consumer Services (VDACS), DCR represents VDACS in commenting on project impacts on state-listed endangered or threatened plant or insect species. DCR finds that the project would not affect such species. However, VDACS recommends that a survey for such species known to occur in Northern Virginia should be conducted before any disturbance of existing natural resources takes place, such as the disturbances anticipated in Alternative C (Draft Plan/EIS, pages 113-122).

*3. Wildlife Resources.*

*(a) Agency Jurisdiction.* The Department of Game and Inland Fisheries, 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. The Department (hereinafter "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 the Department of Environmental Quality 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.

*(b) Findings.* DGIF records do not indicate the presence of any endangered or threatened wildlife species subject to the Department's jurisdiction in the project area. However, the Draft Plan/EIS fails to mention that a pair of Hensley's sparrows (listed by the federal government as a species of concern and by the state government as a threatened species) was observed in the project area during 2005. This information should be included in the Final Plan/EIS. The Department of Game and Inland Fisheries requests information regarding this occurrence; see "Regulatory and Coordination Needs," item 1, below.

*(c) Analysis and Recommendations.* It appears from the Draft Plan/EIS that Alternative B, the Preferred Alternative, which attempts to recreate battlefield conditions of 1861-1862, involves clearing or removal of approximately 327 acres of mature, second-growth forest, and the regeneration of 82 acres (Draft Plan/EIS, pages 51-52); this makes a net loss of 245 acres of forest. In contrast,



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Alternative C would not attempt to recreate the historic landscape but would create view corridors through clearing of approximately 70 acres of trees, including 40 acres at the current Deep Cut corridor (Draft Plan/EIS, page 61). Cleared areas would be managed as open fields, grasslands, and shrublands.

(i) *Forest Losses.* The Department of Game and Inland Fisheries is concerned that the net loss of 245 acres of mature forest under the Preferred Alternative (identified as the environmentally preferable alternative; see "Project Description," above) would adversely affect forest wildlife, particularly songbirds. The Draft Plan/EIS indicates that maintaining the cleared areas as grassland would partially offset these impacts (Draft Plan/EIS, page 115). DGIF agrees that the conversion to grassland could benefit early successional species, such as Hensley's sparrows. However, the ability of the Park to contribute to viable populations of these species is uncertain. Accordingly, DGIF recommends a formal assessment that more thoroughly addresses the positive and negative impacts of the proposed land conversion upon wildlife. This assessment could be part of the Final Plan/EIS or a separate document.

As stated in the Draft Plan/EIS (page 83), the Park is becoming a natural oasis for wildlife as the surrounding region becomes urbanized. For this reason, the recommended assessment should also examine the regional importance of the Park for the long-term preservation of wildlife, taking into account projected changes in land use and land cover inside the Park (under the General Management Plan alternatives) and outside as well.

The Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance indicates that implementation of Alternative B would substantially reduce the forest cover in the Park, which is inconsistent with the general performance criteria in the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-120) even if the 100-foot buffer is maintained as forested. Alternative C contemplates less impact on forested areas and would therefore better comply with the Regulations by saving indigenous vegetation to the maximum extent practicable. See also item 7, below.

(ii) *Grassland and Shrubland Management.* Due to the proposed land cover conversion, the Department of Game and Inland Fisheries recommends development of a grassland/shrubland management plan for the Park. Species such as Hensley's sparrow require large fields (at least 100 acres) consisting of tall, dense grass, a well-developed litter layer, standing dead vegetation, and sparse woody vegetation or none at all. Shrubland species, such as brown thrashers, will use strips of appropriate habitat that is at least 30 feet wide.

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The Department is willing to assist the Park Service with development of this plan. See "Regulatory and Coordination Needs," item 1, below.

(iii) *Vegetation Removal Precautions: Time-of-Year Restrictions.* All logging, clearing, cutting, pesticide application, and other vegetation removal activities should be conducted outside of the nesting season for most birds. The nesting season is approximately April through August. Vegetation removal, accordingly, should take place between September and March of each year.

(iv) *Mowing and Burning of Grassland.* Mowing and burning activities should be conducted in early spring rather than late summer, in order to provide winter habitat for grassland birds.

(v) *Streamside Buffers.* The Department of Game and Inland Fisheries understands that 50-foot streamside buffers are proposed in areas where the forest is to be removed. To minimize potential adverse impact upon aquatic and riparian wildlife species, the Park Service should observe 100-foot buffers on each side of any stream, according to the Department; buffers of 300 feet or more would be better, because smaller buffers will result in adverse impacts upon fish and wildlife resources.

(d) *Additional Wildlife Information.* The Department of Game and Inland Fisheries maintains a data base of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters. This data base may contain information not available from the DCR Biotics Data System (see item 1, above). The data base is at the following web site:

[http://www.dgif/virginia.gov/wildlife/info\\_map/index.html](http://www.dgif/virginia.gov/wildlife/info_map/index.html)

Questions on the data base may be directed to the Department of Game and Inland Fisheries (Shirl Dresser, telephone (804) 367-6913).

#### *4. Outdoor Recreation.*

(a) *Trails.* The Department of Conservation and Recreation notes that while the Draft Plan/EIS makes reference to the Park's relationship to its neighbors and the surrounding communities, no effort is made to connect Park trails with other trails in the region. The Park Service should make efforts to attract visitors who choose to visit by foot or bicycle, through the development of connector trails to existing and proposed trail systems outside the Park. Similarly, an effort should be made to ensure that a non-motorized option is available for people wishing to visit the Park's sites by bicycle or on foot.

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According to Fairfax County, the County's Park Authority is completing the draft Sully Woodlands Regional Master Plan. The County expects that this Plan will recommend trail connections and the development of coordinated interpretive opportunities with the Park. Accordingly, the County recommends that the Park Service provide trail connections across Bull Run from the proposed First Manassas Automobile and Bicycle tour route and the existing interpretive hiking routes and equestrian trails to Sully Woodlands.

*(b) Road Closures.* The proposal to close major secondary roads through the Park, and to detour the commuter and daily traffic around it, is the best solution for the long-term protection of the Park and the Park experience, according to the Department of Conservation and Recreation. For the time being, the Department of Conservation and Recreation supports use of private motor vehicles in the Park, but it hopes that in the future a "people mover" of some type could be used to bring visitors through the Park.

The Department of Transportation indicates precautions in regard road closures (see item 12(a), below), and Fairfax County wishes to retain the capability of U.S. Route 29 as an emergency evacuation highway (see item 12(b), below).

*5. Park Land Planning.* Alternatives B and C both propose acquisition of several tracts of land which, though presently outside Park boundaries, are important to the history of the Battlefield (Draft Plan/EIS, pages 54 and 63, "Boundary Adjustments" headings). The largest of these is the Davis Tract, covering 136 acres. The Civil War Preservation Trust acquired this property with the aid of a federal grant under the National Battlefield Protection Program. One of the stipulations was that the Trust must grant an easement on the property to a third party to ensure its protection from uses incompatible with battlefield preservation. The Virginia Outdoors Foundation holds the easement on the Davis Tract (VOF control number PWM-962) until such time as the Tract can be transferred to the National Battlefield Park (Ellis/Grayson, 3/3/06).

The Foundation urges continued recognition of the Davis Tract as an integral part of the Manassas Battlefield (Ellis/Grayson, 3/3/06).

*6. Solid and Hazardous Waste Management.* According to DEQ's Waste Division, the Draft Plan/EIS did not address solid waste issues and sites or hazardous waste issues and sites.

*(a) Findings.* DEQ's Waste Division conducted a cursory review of its data files and found that the Park is listed in the U.S. Environmental Protection

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Agency's RCRA (Resource Conservation and Recovery Act) Hazardous Waste data base as a conditionally exempt, small-quantity generator of hazardous waste (EPA identification number VA8142300963). The following web site may be helpful in locating additional information for this identification number:

- [http://www.epa.gov/echo/search\\_by\\_permit.html](http://www.epa.gov/echo/search_by_permit.html)

*(b) Pollution Prevention.* DEQ encourages the Park Service to follow pollution prevention principles in all construction projects. These principles include reduction of waste materials at the source, re-use of materials, and recycling of waste materials to the greatest extent practicable.

*7. Chesapeake Bay Preservation Areas.* The following guidance is provided for development activities contemplated under any of the alternatives. The Chesapeake Bay Preservation Act (*Virginia Code* sections 10.1-2100 et seq.) contemplates that local governments within Tidewater Virginia will designate Resource Management Areas landward of areas qualifying as Resource Protection Areas, pursuant to the Act and to the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.) administered by the Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance. Activities in Resource Management Areas are subject to lesser limitation than activities in Resource Protection Areas.

*(a) Resource Management Areas.* Both Fairfax and Prince William Counties have enacted a jurisdiction-wide Chesapeake Bay Resource Management Area designation. This requires that all development activities comply with the stormwater quality requirements of the local stormwater ordinance. This designation also means that the Plan must be consistent with the general performance criteria of the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-120).

*(i) Requirements for Development Activities under the General Performance Criteria.* Activities must:

- disturb no more land than necessary to provide for the proposed use;
- save indigenous vegetation to the maximum extent practicable consistent with the proposed use;
- have a soil and water quality conservation assessment for lands retained in agriculture; and



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- adhering to water quality protection procedures prescribed by the Department of Forestry's Best Management Practices, especially with regard to timber harvesting.

(ii) *Buffer Retention.* Activities in Resource Management Areas that are subject to the general performance criteria must retain the 100-foot buffer between the activity and any wetlands, streams, or other lands fitting the description of Resource Protection Area (see item 7(b), below).

(iii) *Erosion and Sediment Control.* All activities involving a land disturbance of 2,500 square feet or more must comply with the requirements of the Erosion and Sediment Control Law (*Virginia Code* sections 10.1-560 et seq.).

(iv) *Stormwater Management.* All land-disturbing activities must also meet stormwater management criteria consistent with the water quality protection provisions of the Virginia Stormwater Management Regulations (4 VAC 3-20 et seq.; see 4 VAC 3-20-71).

(b) *Resource Protection Areas.* In addition to the general performance criteria for Resource Management Areas (above), areas that are designated as Resource Protection Areas pursuant to the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-130). Of particular importance is 9 VAC 10-20-130.3, which states:

To minimize the adverse effects of human activities on the other components of the Resource Protection Area, state waters, and aquatic life, a 100-foot wide buffer of vegetation that is effective in retarding run-off, preventing erosion, and filtering non-point source pollution from runoff shall be retained if present and established where it does not exist.

(c) *Guidance on Forest Clearing.* The forest clearing intended to reconstruct the historic scene must avoid the 100-foot riparian buffers along all water bodies with perennial flows. In addition, all forestry activity must be consistent with the *Virginia Forestry Best Management Practices for Water Quality* in order to be consistent with the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.).

(d) *Removal of Route 29 Bridge.* The removal of the Route 29 bridge proposed in Alternatives B and C would be an exempt activity under the Regulations (9 VAC 10-20-150.B.1., provided that the demolition would be in accordance with the following:

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- regulations promulgated pursuant to the Erosion and Sediment Control Law (*Virginia Code* sections 10.1-560 et seq.); and
- an erosion and sediment control plan and a stormwater management plan approved by the Department of Conservation and Recreation's Division of Soil and Water conservation; or
- local water quality protection criteria at least as stringent as the foregoing state requirements.

Removal of the bridge would cause temporary impacts to Bull Run, even with erosion and sediment controls in place.

(e) *New Visitor Center.* According to the Draft Plan/EIS, the Park Service would retain the existing visitor centers under Alternative B (pages 45-46), but it would remove the Henry Hill Visitor Center and construct a new Stone Bridge visitor center near the eastern boundary of the Park under Alternative C. The new visitor center would require a new access road and bridge over Bull Run (pages 55-56). These activities would increase the amount of impervious surface, somewhat offset by the removal of the Henry Hill Visitor Center, if Alternative C were chosen. The Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance recommends that the Park Service reconsider placing the visitor center along either of the Route 234 entrances, the southern Route 622 entrance, or the western Route 29 entrance to the Park.

Fairfax County also raises concerns about this Visitor Center. See item 14(b), below.

8. *Air Quality.* DEQ's Division of Air Program Coordination states that the long-range impact of the Plan on air quality in the Park would be beneficial. However, in an area of ozone non-attainment, any construction activities under the Plan should include precautions to restrict emissions of volatile organic compounds (VOCs) and oxides of nitrogen (NO<sub>x</sub>), the precursors of atmospheric ozone (O<sub>3</sub>). With regard to construction activities, the following advice is offered.

(a) *Fugitive Dust Control.* During construction, fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations for the Control and Abatement of Air Pollution. These include, but are not limited to, the following:

- Use, where possible, of water or chemicals for dust control;

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- 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.

(b) *Open Burning.* If construction activities include the burning of construction or demolition material or land-clearing debris, this activity must meet the requirements under 9 VAC 5-40-5600 et seq. of the Regulations for open burning, and it may require a permit (see “Regulatory and Coordination Needs,” item 2, below). The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Park Service should contact Prince William or Fairfax County officials, as appropriate, to determine what local requirements, if any, exist. The model ordinance includes, but is not limited to, the following provisions:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of brush, stumps and similar debris waste and clean burning demolition material;
- The burning shall be at least 500 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
- The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

(c) *Fuel-burning Equipment.* Fuel-burning equipment may require an air pollution control permit, depending on its capacities and its potential to emit air pollutants. See “Regulatory and Coordination Needs,” item 2, below.

9. *Natural Area Preserves.* According to the Department of Conservation and Recreation, there are no state Natural Area Preserves in the vicinity of the Park.

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#### *10. Water Quality and Wetlands.*

(a) *Water Quality and Wetland Impacts.* According to DEQ's Northern Virginia Regional Office, only Alternative C contemplates direct impacts to surface waters. However, based on Maps 3-2 (page 86) and 4-1 (page 119) in the Draft Plan/EIS, both action alternatives (B and C) contemplate forest clearing in areas that appear to include wetlands. DEQ considers the conversion of one wetland type to another (i.e., forested wetland to emergent wetland) to be a wetland impact. Fairfax County, citing the same maps, notes that wetland and riparian areas would both be affected by forest clearing, and that the Draft Plan/EIS makes inconsistent statements on this subject (see pages 66, 67, and 116 of the document, and page 5 of the County's comments, enclosed).

(b) *Wetland Delineation.* DEQ's Northern Virginia Regional Office recommends that the Park Service conduct a wetland delineation of the proposed project areas, because the Park Service's review of National Wetland Inventory maps does not cover legal boundaries of wetlands or stream channels with precision. The boundaries of wetlands and stream channels regulated by the Virginia Water Protection Permit are determined by wetland delineations that are confirmed by the Army Corps of Engineers, Norfolk District. The Park Service would need to obtain such confirmation from the Corps; see "Regulatory and Coordination Needs," item 5, below.

(c) *Wetland Mitigation Guidance.* For any construction projects, DEQ recommends that stream and wetland impacts be avoided to the maximum extent practicable. To minimize unavoidable impacts to wetlands and waterways, DEQ recommends the following practices:

- Operate machinery and construction vehicles outside of stream-beds and wetlands; use synthetic mats when in-stream work is unavoidable;
- Erosion and sedimentation controls should be designed in accordance with the most current edition of the *Virginia Erosion and Sediment Control Handbook* (available from the Department of Conservation and Recreation's Potomac Watershed Office (telephone (540) 347-6420). These controls should be in place prior to clearing and grading, and maintained in good working order to minimize impacts to State waters. The controls should remain in place until the area is stabilized.
- Place heavy equipment, located in temporarily impacted wetland areas, on mats, geotextile fabric, or use other suitable measures to minimize soil disturbance, to the maximum extent practicable.
- Restore all temporarily disturbed wetland areas to pre-construction conditions and plant or seed with appropriate wetlands vegetation in

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accordance with the cover type (emergent, scrub-shrub, or forested). The applicant should take all appropriate measures to promote re-vegetation of these areas. Stabilization and restoration efforts should occur immediately after the temporary disturbance of each wetland area instead of waiting until the entire project has been completed.

- Place all materials which are temporarily stockpiled in wetlands, designated for use for the immediate stabilization of wetlands, on mats, geotextile fabric in order to prevent entry in State waters. These materials should be managed in a manner that prevents leachates from entering state waters and must be entirely removed within thirty days following completion of that construction activity. The disturbed areas should be returned to their original contours, stabilized within thirty days following removal of the stockpile, and restored to the original vegetated state.
- All non-impacted surface waters within the project or right-of-way limits that are within 50 feet of any clearing, grading, or filling activities should be clearly flagged or marked for the life of the construction activity within that area. The project proponent should notify all contractors that these marked areas are surface waters where no activities are to occur.
- Measures should be employed to prevent spills of fuels or lubricants into state waters.

(d) *Virginia Water Protection Permit.* A Virginia Water Protection Permit will be required if Alternative C is pursued, or if impacts to surface waters are proposed (see the Virginia Water Protection Permit Program Regulations, 9 VAC 25-210-50). Additional guidance appears in "Regulatory and Coordination Needs," item 5, below.

*11. Historic Structures and Archaeological Resources.* To ensure compliance with section 106 of the National Historic Preservation Act, as amended, the Park Service must coordinate with the State Historic Preservation Office, which in Virginia is the Department of Historic Resources. See "Regulatory and Coordination Needs," item 5, below.

*12. Roads and Traffic.* According to the Virginia Department of Transportation (VDOT), Alternatives B and C involve closing U.S. Route 29 and State Route 234, both of which presently traverse the Battlefield. The Park Service and the Federal Highway Administration conducted a study of potential bypass routes around the Battlefield that, if accepted, will allow the transfer of Routes 29 and 234 within the Park to the Park Service and their eventual closure to through traffic (see Draft Plan/EIS, page 6).



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Fairfax County notes that from its standpoint, Alternative B would involve the closure of the U.S. Route 29 bridge over Bull Run without a replacement; Alternative C would involve the same, but with a bridge replacement. See subsection (b), below.

(a) *Timing of Proposed Closure with Regard to Traffic Needs.* According to VDOT, closing Routes 29 and 234 before an operational bypass is constructed would not be acceptable because of the traffic impacts such a closing would have upon Interstate Route 66, the only nearby arterial road. Fairfax County also indicates that alternative replacement roads should be completed and opened to traffic as a prerequisite to closure of Route 29 or Route 234 through the Park. At this time, according to VDOT, Route 66 is the subject of a widening project to accommodate the severe daily congestion. Accidents at the signalized intersection of Routes 29 and 234 have been reduced by the recent construction of left turn lanes. VDOT states that Route 29, even through the Battlefield, is on the National Highway System and was designated as a "Congressional High Priority" road.

(b) *Emergency Purposes of U.S. Route 29.* According to Fairfax County, the existing Route 29 should remain available for emergency evacuation purposes even if through traffic is ultimately re-routed for normal operations. The Draft Plan/EIS indicates that closure of the existing Route 29 bridge over Bull Run and construction of a new bridge, as contemplated in Alternative C, would give rise to adverse environmental impacts (page 66). For this reason, Fairfax County believes that the Park Service should consider keeping the existing bridge, or, if it must be removed, constructing a new replacement bridge in a way that preserves U.S. Route 29 as a viable rapid emergency evacuation route.

(c) *Relationship of Alternative Plans to New Bypass Roads.* Fairfax County indicates that because both Alternatives B and C are predicated on the closure of Routes 29 and 234 to through traffic and the routing of such traffic onto a new Battlefield bypass, it would be premature to take action in favor of either of these alternatives until the overall impacts of a Battlefield bypass project and the two alternatives can be considered comprehensively. A different approach would be to develop interim management schemes for Alternatives B and C that would (1) allow the Park Service to move forward with activities unrelated to the road closures, and (b) recognize the need to keep the existing routes open until issues associated with the proposed Battlefield bypass are resolved and the new road is opened. See also item 14(a), below.

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13. *Aviation.* The Department of Aviation, mindful of the proximity of the Manassas Regional Airport, recommends the following precautions associated with any developments pursuant to the Plan:

- Part 77 penetrations at the airport should be prohibited. (This refers to Federal Aviation Regulations, Part 77, which regulates man-made or natural objects vertically intruding into the flight path to or from the ends of an airport runway) (Ellis/McCrea, 3/6/06).
- The congregation of large numbers of people in the approach and departure corridors of the airport should be avoided; and
- Development activities should not cause glare, large quantities of dust or smoke, attract large numbers of birds, or pose hazards to air navigation.

14. *Local and Regional Comments.*

(a) *Planning and Environmental Review Process.* Fairfax County recommends that if one or more interim management options cannot be developed to accommodate a comprehensive look at the overall impacts of a Battlefield bypass project and Alternatives B and C as proposed in the Draft Plan/EIS (see item 11(c), above), then the Park Service should delay adoption of a new management plan for the Park until the Park Service can resolve issues with the Fairfax County Park Authority, complete additional traffic studies, allow citizen involvement, and coordinate the studies and review process with Fairfax County.

(b) *Visitor Center Siting and Design.* Fairfax County recommends that the Park Service consider Fairfax County's Chesapeake Bay Preservation Ordinance (see item 7, above), its Water Supply Protection Overlay District, and its Environmental Quality Corridor policy in any siting and design decisions for a new visitor center, in the event a location in Fairfax County is pursued. The Fairfax County area in and near the Park is located in a larger area that was rezoned in 1982 for five-acre lot residential development in order to protect the Occoquan Reservoir, one of the County's primary sources of drinking water (see item 10(c), above). The County staff would welcome coordination relative to the locations of Resource Protection Areas and Environmental Quality Corridors, as well as stormwater management best management practices. See "Regulatory and Coordination Needs," item 4, below.

Fairfax County indicates that the Draft Plan/EIS incorrectly characterizes the potential impacts of a new visitor center under Alternative C. The document

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states that “negligible impacts would be expected because the surrounding area is already quite built up commercially” (page 27). The areas of Fairfax County immediately east of Bull Run near Route 29 are generally rural in character, except for an industrial area including the Luck Stone Quarry, and the County’s Comprehensive Plan recommends low-density residential development and public parkland for the area. A visitor center with extensive parking and traffic flow would create a marked contrast with the area and conflict with the Comprehensive Plan, as would extension of sewer service into the area. (See also item 7(e), above).

### Regulatory and Coordination Needs

1. *Wildlife Resources.* We recommend that the Park Service contact the Department of Game and Inland Fisheries to provide information concerning the reported sighting of a pair of Hensley’s sparrows in the past year (see “Environmental Impacts and Mitigation,” item 2(b), above). The information should include:

- The location where the sparrows were observed;
- The habitat associated with the location; and
- Any evidence of breeding.

The Park Service should provide this information to the Department of Game and Inland Fisheries (4010 West Broad Street, Richmond, Virginia 23230). Questions may be addressed to the Department (Jeff Cooper, Wildlife Diversity Biologist, telephone (540) 899-4169; Sergio Harding, Inter-agency Bird Coordinator, telephone (804) 367-0143; or Andy Zadnik, Environmental Services Section Biologist, telephone (804) 367-2733).

Similarly, DGIF requests that the Park Service coordinate efforts with the staff listed above relative to development of a management plan for grassland and shrubland in the Park (see “Environmental Impacts and Mitigation,” item 2(c)(ii), above).

2. *Air Quality Regulation.* Permits may be needed for fuel-burning equipment if any is used in construction or operation of facilities contemplated under the Plan. DEQ’s Northern Virginia Regional Office (Mr. Terry Darton, Air Permits Manager, telephone (703) 583-3845) should be contacted to inquire about permitting needs. The same Office should be contacted to determine whether an open burning permit is required.



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**3. Solid and Hazardous Waste Management.** DEQ provides the following guidance relative to any construction, demolition, or renovation projects undertaken pursuant to the General Management Plan, once it is put in final form and adopted.

(a) *Contamination.* Any soil suspected of contamination, or wastes that are generated, must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations. These include, but are not limited to, the Virginia Waste Management Act (*Virginia Code* sections 10.1-1400 *et seq.*), the Virginia Hazardous Waste Management Regulations (9 VAC 20-60), and the Virginia Solid Waste Management Regulations (9 VAC 20-80). (See the enclosed DEQ memo, Brockman to Ellis, dated February 17, 2006 for additional citations.)

(b) *Demolition of Structures.* Any structure to be demolished should be checked for asbestos-containing materials and lead-based paint prior to its demolition. If asbestos-containing materials are found, the Park Service must follow the requirements of the Solid Waste Management Regulations (9 VAC 20-80-640) as well as federal regulations (see the memo referenced above). If lead-based paints are found, the Park Service must follow the requirements of the Hazardous Waste Management Regulations (9 VAC 20-60-261) in addition to other applicable requirements.

Questions on asbestos abatement may be directed to the Department of Labor and Industry (Ronald Graham, telephone 786-5074). Questions on abatement of lead-based paint may be directed to the Department of Professional and Occupational Regulation (telephone 367-8595).

**4. Chesapeake Bay Preservation Act.** To ensure that activities carried out under the Plan are consistent with the Chesapeake Bay Preservation Area requirements of Fairfax County and Prince William County, the Park Service may contact the Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance (Alice Baird, telephone (804) 225-2307). In addition, Fairfax County staff can provide guidance on the locations of Resource Protection Areas and Environmental Quality Corridors, as well as on stormwater management. The Park Service is invited to contact the County's Department of Planning and Zoning (Noel Kaplan, telephone (703) 324-1380).

**5. Historic Structures and Archaeological Resources.** To ensure that activities carried out under the Plan are consistent with section 106 of the National Historic Preservation Act, the Park Service should contact the

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Department of Historic Resources (Dr. Ethel Eaton, Manager of Review and Compliance, telephone (804) 367-2323, extension 112).

*6. Water and Wetland Regulation.* As indicated above ("Environmental Impacts and Mitigation," item 10), DEQ recommends that the Park Service conduct a wetland delineation for all areas in which wetland impacts are proposed or might result from activities under the adopted Plan. The delineation should be confirmed by submitting the report on it to:

U.S. Army Corps of Engineers, Norfolk District  
Regulatory Branch  
803 Front Street  
Norfolk, Virginia 23510.

Questions on this process may be directed to the Corps (Bob Hume, telephone (757) 201-7657).

The Virginia Water Protection Permit process should be initiated for any wetland or surface water impacts. The Park Service should contact DEQ's Northern Virginia Regional Office (John Bowden, telephone (703) 583-3880) regarding the Joint Federal-State Permit Application (JPA) document and process.

*7. Subaqueous Lands Encroachment.* In the event any development activities under the Plan are likely to encroach in, on, or over state-owned rivers, streams, or creeks, the proponent will need to apply for an encroachment permit from the Marine Resources Commission. The vehicle for this application is the JPA mentioned above (preceding item). Questions on this permit requirement may be directed to the Commission (Ben McGinnis, telephone (757) 247-2200).

*8. Natural Heritage Coordination.* The Department of Conservation and Recreation's Division of Natural Heritage would like to provide detailed input to the Park Service on specific areas where changes in vegetation cover are proposed (particularly Forest Cut areas) as the projects come up for implementation. Similarly, the Park Service should consult with the Division to determine which forest community is likely to occupy a particular site as a result of long-term successional processes. This will aid the Park Service in ensuring that plantings within re-forestation areas are consistent with the composition of indigenous forest communities. The Park Service may contact the Department of Conservation and Recreation's Division of Natural Heritage (Rene` Hypes, telephone (804) 371-2708) for this guidance and input.

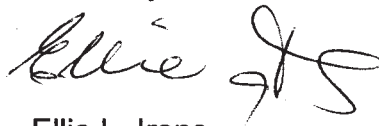
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*9. Federal Consistency under the Coastal Zone Management Act.*

Pursuant to the Coastal Zone Management Act of 1972, as amended, the Park Service is required to determine the consistency of its activities affecting Virginia's coastal resources or coastal uses with the Virginia Coastal Resources Management Program (VCP) (see section 307(c)(1) of the Act and the Federal Consistency Regulations at 15 CFR Part 930, sub-part C, section 930.34). This involves an analysis of the activities in light of the Enforceable Policies of the VCP (first enclosure), and submission of a consistency determination reflecting that analysis and committing the Park Service to comply with the Enforceable Policies. In addition, we invite your attention to the Advisory Policies of the VCP (second enclosure). The federal consistency determination may be provided as part of the documentation concluding the NEPA process, or independently, depending on your agency's preference. Section 930.39 gives content requirements for the consistency determination. If you need clarification of these comments, please contact DEQ's Office of Environmental Impact Review (Charles Ellis, telephone (804) 698-4488).

Thank you for the opportunity to review this document. Detailed comments from reviewers are attached for your information. If you have questions, please feel free to call me (telephone (804) 698-4325) or Charles Ellis of this Office (telephone (804) 698-4488).

Sincerely,

A handwritten signature in cursive script, appearing to read "Ellie L. Irons".

Ellie L. Irons  
Program Manager  
Office of Environmental Impact Review

Enclosures  
Cc: (next page)

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cc: Andrew K. Zadnik, DGIF  
Keith R. Tignor, VDACS  
Scott Bedwell, DCR  
Allen R. Brockman, DEQ-Waste  
Kotur S. Narasimhan, DEQ-Air  
John D. Bowden, DEQ-NVRO  
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Roger W. Kirchen, DHR  
Alice R. T. Baird, DCR-DCBLA  
Katherine K. Mull, NVRC  
Leslie Grayson, VOF Warrenton  
R. Scott Denny, VDA  
✓ Craig S. Gerhart, Prince William County  
Erin K. Flanagan, DOI-NPS-DSC



## COMMONWEALTH of VIRGINIA

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Secretary of Natural Resources

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### Attachment 1

#### **Enforceable Regulatory Programs comprising Virginia's Coastal Resources Management Program (VCP)**

- a. **Fisheries Management** - The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (VMRC); Virginia Code sections 28.2-200 to 28.2-713 and the Department of Game and Inland Fisheries (DGIF); Virginia Code sections 29.1-100 to 29.1-570.

The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The VMRC, DGIF, and Virginia Department of Agriculture Consumer Services (VDACS) share enforcement responsibilities; Virginia Code sections 3.1-249.59 to 3.1-249.62.

- b. **Subaqueous Lands Management** - The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, tidal wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the Department of Environmental Quality (DEQ). The program is administered by the Marine Resources Commission; Virginia Code sections 28.2-1200 to 28.2-1213.

- c. **Wetlands Management** - The purpose of the wetlands management program is to preserve wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation.

- (1) The tidal wetlands program is administered by the Marine Resources Commission; Virginia Code sections 28.2-1301 through 28.2-1320.
- (2) The Virginia Water Protection Permit program administered by DEQ includes protection of wetlands --both tidal and non-tidal; Virginia Code section 62.1-44.15:5 and Water Quality Certification pursuant to section 401 of the Clean Water Act.

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- d. Dunes Management - Dune protection is carried out pursuant to The Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by the Marine Resources Commission; Virginia Code sections 28.2-1400 through 28.2-1420.
- e. Non-point Source Pollution Control – (1) Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by the Department of Conservation and Recreation; Virginia Code sections 10.1-560 et seq..  
  
(2) Coastal Lands Management is a state-local cooperative program administered by the DCR's Division of Chesapeake Bay Local Assistance and 84 localities in Tidewater (see i) Virginia; Virginia Code sections 10.1-2100 through 10.1-2114 and 9 VAC10-20 et seq.
- f. Point Source Pollution Control - The point source program is administered by the State Water Control Board (DEQ) pursuant to Virginia Code section 62.1-44.15. Point source pollution control is accomplished through the implementation of:
  - (1) the National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to section 402 of the federal Clean Water Act and administered in Virginia as the Virginia Pollutant Discharge Elimination System (VPDES) permit program.
  - (2) The Virginia Water Protection Permit (VWPP) program administered by DEQ; Virginia Code section 62.1-44.15:5 and Water Quality Certification pursuant to section 401 of the Clean Water Act.
- g. Shoreline Sanitation - The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (Virginia Code sections 32.1-164 through 32.1-165).
- h. Air Pollution Control - The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (Virginia Code sections 10.1-1300 through 10.1-1320).
- (i) Coastal Lands Management is a state-local cooperative program administered by the DCR's Division of Chesapeake Bay Local Assistance and 84 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act; Virginia Code sections 10.1-2100 through 10.1-2114 and Chesapeake Bay Preservation Area Designation and Management Regulations; Virginia Administrative Code 9 VAC 10-20-10 et seq.



## Attachment 2

### Advisory Policies for Geographic Areas of Particular Concern

- a. Coastal Natural Resource Areas - These areas are vital to estuarine and marine ecosystems and/or are of great importance to areas immediately inland of the shoreline. Such areas receive special attention from the Commonwealth because of their conservation, recreational, ecological, and aesthetic values. These areas are worthy of special consideration in any planning or resources management process and include the following resources:
  - a) Wetlands
  - b) Aquatic Spawning, Nursery, and Feeding Grounds
  - c) Coastal Primary Sand Dunes
  - d) Barrier Islands
  - e) Significant Wildlife Habitat Areas
  - f) Public Recreation Areas
  - g) Sand and Gravel Resources
  - h) Underwater Historic Sites.
  
- b. Coastal Natural Hazard Areas - This policy covers areas vulnerable to continuing and severe erosion and areas susceptible to potential damage from wind, tidal, and storm related events including flooding. New buildings and other structures should be designed and sited to minimize the potential for property damage due to storms or shoreline erosion. The areas of concern are as follows:
  - i) Highly Erodible Areas
  - ii) Coastal High Hazard Areas, including flood plains.
  
- c. Waterfront Development Areas - These areas are vital to the Commonwealth because of the limited number of areas suitable for waterfront activities. The areas of concern are as follows:
  - i) Commercial Ports
  - ii) Commercial Fishing Piers
  - iii) Community Waterfronts

Although the management of such areas is the responsibility of local government and some regional authorities, designation of these areas as Waterfront Development Areas of Particular Concern (APC) under the VCRMP is encouraged. Designation will allow the use of federal CZMA funds to be used to assist planning for such areas and the implementation of such plans. The VCRMP recognizes two broad classes of priority uses for waterfront development APC:

- i) water access-dependent activities;
- ii) activities significantly enhanced by the waterfront location and complementary to other existing and/or planned activities in a given waterfront area.

**attachment 2, page 2**

**Advisory Policies for Shorefront Access Planning and Protection**

- a. Virginia Public Beaches - Approximately 25 miles of public beaches are located in the cities, counties, and towns of Virginia exclusive of public beaches on state and federal land. These public shoreline areas will be maintained to allow public access to recreational resources.
- b. Virginia Outdoors Plan - Planning for coastal access is provided by the Department of Conservation and Recreation in cooperation with other state and local government agencies. The Virginia Outdoors Plan (VOP), which is published by the Department, identifies recreational facilities in the Commonwealth that provide recreational access. The VOP also serves to identify future needs of the Commonwealth in relation to the provision of recreational opportunities and shoreline access. Prior to initiating any project, consideration should be given to the proximity of the project site to recreational resources identified in the VOP.
- c. Parks, Natural Areas, and Wildlife Management Areas - Parks, Wildlife Management Areas, and Natural Areas are provided for the recreational pleasure of the citizens of the Commonwealth and the nation by local, state, and federal agencies. The recreational values of these areas should be protected and maintained.
- d. Waterfront Recreational Land Acquisition - It is the policy of the Commonwealth to protect areas, properties, lands, or any estate or interest therein, of scenic beauty, recreational utility, historical interest, or unusual features which may be acquired, preserved, and maintained for the citizens of the Commonwealth.
- e. Waterfront Recreational Facilities - This policy applies to the provision of boat ramps, public landings, and bridges which provide water access to the citizens of the Commonwealth. These facilities shall be designed, constructed, and maintained to provide points of water access when and where practicable.
- f. Waterfront Historic Properties - The Commonwealth has a long history of settlement and development, and much of that history has involved both shorelines and near-shore areas. The protection and preservation of historic shorefront properties is primarily the responsibility of the Department of Historic Resources. Buildings, structures, and sites of historical, architectural, and/or archaeological interest are significant resources for the citizens of the Commonwealth. It is the policy of the Commonwealth and the VCRMP to enhance the protection of buildings, structures, and sites of historical, architectural, and archaeological significance from damage or destruction when practicable.



**Ellis, Charles**

---

**From:** Andrew Zadnik [Andrew.Zadnik@dgif.virginia.gov]  
**Sent:** Wednesday, February 01, 2006 12:36 PM  
**To:** Ellis, Charles  
**Cc:** nhreview@dcf.virginia.gov; ProjectReview.Richmond\_PO.DGIF@dgif.virginia.gov  
**Subject:** Draft Manassas Battlefield General Management Plan - EIS

Charlie,

I don't know if you're coordinating comments on this or not, but I received a notice from the NPS, so I thought I'd put something together and respond through the NPS website. Use these comments as you wish. Thanks.

This project involves development of a General Management Plan (GMP) for Manassas National Battlefield Park. The approved plan will help managers make decisions for the next 15 - 20 years. Three alternatives are considered in the draft Environmental Impact Statement (EIS) - a "no action" alternative and 2 "action" alternatives (B and C). Under the Preferred Alternative (B), rehabilitation of the historic landscape would be critical. This would involve the phased removal of approximately 327 ac of mature second growth forest and the natural regeneration of 82 ac of forest (a net loss of 245 ac of forest). Alternative C would result in the removal of 72 ac of forest. Under both alternatives, the cleared areas are proposed to be managed as open fields, grasslands, and shrublands.

Our records do not document the presence of any Threatened or Endangered wildlife resources under our jurisdiction to occur within the project area. While not mentioned in the draft EIS, we understand that a pair of Henslow's sparrows (Federal Species of Concern/State Threatened) was reported on site in 2005. This information should be included in the final EIS. Furthermore, we request information regarding this occurrence, including location, habitat association, and any evidence of breeding.

We are concerned that the net loss of 245 acres of mature forest, under the Preferred Alternative, may result in an adverse impact upon forest dwelling wildlife, particularly songbirds. According to the draft EIS (Page 115), to partially offset the impacts of forest removal, the cleared areas would be maintained as grassland. We agree that this conversion could benefit early successional species, such as Henslow's sparrows. However, we are unsure as to the ability of the park to contribute to viable populations of these species. We recommend a formal assessment that more thoroughly addresses the positive and negative impacts of the proposed land conversion on wildlife. This assessment could be part of the final EIS or a separate document. As stated on Page 83 of the draft EIS, this park is increasingly becoming a natural oasis as the surrounding region becomes urbanized. Therefore, this assessment should examine the regional importance of this park for the long-term preservation of wildlife, taking into account projected changes in land use/land cover inside (under the GMP alternatives) and outside of the park.

Due to the proposed land cover conversion, we also recommend development of a grassland/shrubland management plan for the park. We note that species such as Henslow's sparrows require large fields (at least 100 acres) consisting of tall, dense grass, a well-developed litter layer, standing dead vegetation, and sparse or no woody vegetation. Shrubland species, such as brown thrashers, will utilize strips of appropriate habitat that is at least 30 ft wide. We are willing to assist with development of this plan. Please contact me, VDGIF Wildlife Diversity Biologist Jeff Cooper (540-899-4169), or VDGIF Interagency Bird Coordinator Sergio Harding (804-367-0143) for more information.

We recommend that all logging, clearing, cutting, pesticide application, and other vegetation removal activities be conducted outside of the nesting season for most birds, roughly April through August. Grassland mowing and burning should be conducted in early spring rather than late summer in order to provide winter habitat for grassland birds.

Within the forest removal areas, we understand that riparian buffers will be maintained along all streams to mitigate potential bank erosion and channel siltation. We recommend that these buffers be at least 100 ft to each side of the streams, and ideally 300+ ft. Smaller buffers will result in adverse impacts upon fish and wildlife resources.

CONSULTATION AND COORDINATION

The VDGIF maintains a comprehensive database containing up-to-date information on fish and wildlife resources in Virginia. This is called the Virginia Fish and Wildlife Information Service (VAFWIS). We recommend use of the VAFWIS during the initial stages of any project in order to identify critical wildlife resources that may be impacted. Basic access to the VAFWIS is via our website, <http://vafwis.org/WIS/ASP/default.asp>. Subscriptions to the VAFWIS, which allow a greater level of access, also are available. Alternatively, an Initial Project Review by our VAFWIS staff can be conducted upon request. For more information, please contact Shirl Dressler (804-367-6913).

Thank you,

Andrew K. Zadnik  
Environmental Services Section Biologist  
Department of Game and Inland Fisheries  
4010 West Broad Street  
Richmond, VA 23230

(804) 367-2733  
(804) 367-2427 (fax)

If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 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:

MR. CHARLES H. ELLIS III  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
629 EAST MAIN STREET, SIXTH FLOOR  
RICHMOND, VA 23219  
FAX #804/698-4319

RECEIVED


FEB 28 2006

DEQ-Office of Environmental  
Impact Review

  
CHARLES H. ELLIS III  
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

Statements in the project document concerning endangered species were reviewed and compared to available information. A survey for endangered and threatened species known to occur in the northern Virginia region should be conducted prior to any disturbance to existing natural resources, such as those anticipated in Alternative C in the EIS.

(signed)  (Keith R. Tignor) February 24, 2006  
Endangered Species Coordinator (date)  
(title) VDACS, Office of Plant and Pest Service  
(agency)

PROJECT # 06-031F

8/98

L. Preston Bryant, Jr.  
Secretary of Natural  
Resources



Joseph H. Maroon  
Director

**COMMONWEALTH of VIRGINIA**  
**DEPARTMENT OF CONSERVATION AND RECREATION**

203 Governor Street, Suite 326  
Richmond, Virginia 23219-2010  
(804) 786-2556 FAX (804) 371-7899

**MEMORANDUM**

**DATE:** March 1, 2006

**TO:** Mr. Charles H. Ellis, III  
Department of Environmental Quality  
Office of Environmental Impact Review  
629 East Main Street, Sixth Floor  
Richmond, Va. 23219  
[chellis@deq.state.va.us](mailto:chellis@deq.state.va.us)  
(804) 698-4488

**FROM:** Robert Munson, Planning Bureau Manager  
Virginia Department of Conservation and Recreation

**SUBJECT:** DEQ-06-031F: DOI/NPS – Manassas National Battlefield Park Draft GMP

The Department of Conservation and Recreation has reviewed the draft GMP and has the following comments for your consideration. We support those measures that will best restore the significant setting of the park while allowing the visiting public to understand the events that took place during both battles. We support use of private vehicles in the interim, but hope that in the future a "people mover" of some sort could be used to bring visitors through the park.

We also note that while reference is made to the park's relationship to its neighbors and the surrounding communities, no effort is made to connect park trails with those in the region. Efforts should be made to attract visitors who choose to come by foot or bicycle through the development of connector trails to existing and proposed trails systems outside of the Park. Likewise, an effort should be made to ensure that a non-motorized option for visiting the park's sites exists for persons wishing to tour the park by bicycle or on foot.

The proposal to close major state secondary roads through the park and to detour the commuter and daily traffic around the park is the best solution for the long-term protection of the park and the park experience.

The Department of Conservation and Recreation (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.

*State Parks • Soil and Water Conservation • Natural Heritage • Outdoor Recreation Planning  
Chesapeake Bay Local Assistance • Dam Safety and Floodplain Management • Land Conservation*

## General Comments

Our general understanding of natural communities has increased greatly since the 1997 inventory. In addition, the forest communities of the Park were inventoried and mapped in 2002, and vegetation of the entire Park is currently being mapped as part of the NCR Region Vegetation Mapping Project. As a result, we would like to provide the Park with detailed input on specific areas where changes in vegetation cover are proposed (particularly Forest Cut Areas), as these projects come up for implementation.

On page 83 of the general management plan in regards to the Rare, Threatened and Endangered Species and Natural Communities, additional occurrences of significant natural communities (Acidic Oak-Hickory Forest, Basic Oak-Hickory Forest, Upland Depression Swamp) and an additional occurrence of the state-rare plant *Stachys pilosa* var. *arenicola* will soon be entered into the VANHP (Virginia Natural Heritage Program) database. This update is the result of additional inventory work conducted during the NCR Parks Vegetation Mapping Project.

DCR recommends that any plantings within the re-forestation areas should be consistent with the composition of indigenous forest communities of the area. Consult with VANHP to determine which forest community is likely to occupy a particular site as the result of long-term successional processes.

## Preferred Alternative B:

### Stuarts Hill / Cundiff House Forest Cut Area:

The forested upland depression swamp, containing an occurrence of Marsh hedgenettle, (*Stachys pilosa* var. *arenicola*, G5/S1/NL/NL), are located at the east foot of Stuarts Hill in the ecotone between the forest that is proposed for removal and the open fields. DCR recommends avoiding harvest of the wooded depression with Marsh hedgenettle, to keep community intact. This cut needs to be planned to protect this community and rare plant population, as well as provide ample buffer to mitigate against invasion of weeds that will become rampant in this area following canopy removal.

Marsh hedgenettle can be found, typically in the western region of the U.S., and adventives eastward. Known to have hairs on the stem, leaves are distinctly longer about 2-4 cm wide, shaped as lance-ovate or broadly oblong to ovate, but scarcely stouter than those of the sides (Cronquist & Gleason, 1993).

### Forest Cut Area south of U.S. Rt. 29 and Battery Heights:

DCR has major concerns about the direct and/or indirect impacts of this forest removal on an Upland Depression Swamp occurrence located either within or immediately adjacent to the cut (the map is too coarse-scaled to tell). This community needs to be protected with an ample buffer provided between the clearcut area and both the wetland and an old, fine example of Basic Oak-Hickory Forest.

Typically thinly forested, upland depression swamp communities occur in seasonally flooded upland areas on hardpan soils in the Piedmont region (Van Alstine et al, 1999). The forest canopy is usually dominated by willow oak (*Quercus phellos*) and overcup oak (*Quercus lyrata*), the presence of which often indicates mafic substrates. Other frequent trees are red maple (*Acer rubrum*) and sweet gum (*Liquidambar straciflua*). The shrub and herb layers are typically sparse but may include species such as possum haw (*Ilex decidua*), greenbriar (*Smilax rotundifolia*), sedges (*Carex*) and *Sphagnum* species (Schafale and Weakley, 1990). The composition of this rare community type is maintained by its hydrology; therefore, anything that alters the natural hydrology of the area is a serious threat to upland depression swamp communities.



Occurring primarily in the Piedmont region, basic oak-hickory forest communities are found on dry to dry-mesic slopes, ridges, and upland flats on circumneutral soils rich in base cations, particularly calcium and/or magnesium (Schafale and Weakley, 1990). As the name implies, oaks (*Quercus* spp.) and hickories (*Carya* spp.) are the dominant tree species, forming open to semi-open canopy conditions. As with most communities on basic soils, the understory, shrub and herbaceous layers tend to be very species rich with many basicophiles represented (Van Alstine et al, 1999). Typical species include eastern red bud (*Cercis canadensis*), American hazelnut (*Corylus americana*), American holly (*Ilex opaca*), flowering dogwood (*Cornus florida*), eastern hop-hornbeam (*Ostrya virginiana*), limestone goldenrod (*Solidago sphacelata*), wild hydrangea (*Hydrangea arborescens*), and Virginia creeper (*Parthenocissus quinquefolius*), among many others. Threats to occurrences of basic oak-hickory forest communities include logging, development, and infestation by the gypsy moth (Fleming et al., 2005).

#### **Henry Hill / Chinn Branch Forest Cut Area:**

DCR has some concerns about this cut that were provided to the Park in our 1997 Natural Heritage Inventory report. Park Service data provided to VANHP indicates that at least some of the area lying between the loop road and the ravine on the east side of Chinn Branch was forested during the Civil War. However, the precise boundary between historical and non-historical forest could not be determined, either from the map provided or field reconnaissance. The slopes in this area are rather steep and the quality of the Acidic Oak-Hickory Forest is good. Therefore, DCR recommends that this hardwood stand be excluded from that cut.

Acidic Oak-Hickory Forests are ecologically intermediate between species-rich Basic Oak-Hickory Forests and floristically depauperate Oak/Heath Forests. They occupy less fertile soils and have lower species-richness and more ericaceous shrubs than do Basic Oak-Hickory Forests. They are distinguished from Montane Oak-Hickory Forests by their restriction to low-elevation or submontane habitats and corresponding composition consisting mostly of species that do not occur at higher elevations. Many contemporary stands of Acidic Oak-Hickory Forests are suffering from the effects of fire exclusion, including poor oak recruitment and the invasion of understories by fire-intolerant mesophytic species such as red maple (*Acer rubrum*), American beech (*Fagus grandifolia*), and blackgum (*Nyssa sylvatica*) (Fleming et al., 2005).

#### **Brawner Farm / Deep Cut Forest Cut Area:**

VANHP has already provided extensive comments and consulted with the Park on this project. Restoration of native Piedmont Prairie vegetation would be highly desirable on this area following forest removal, and should benefit the occurrence of the rare plant Buffalo clover, (*Trifolium reflexum*, G5/S1/NL/NL). DCR also recommends strict adherence to erosion and sediment control practices are critical to protecting Appalachia quillwort, (*Isoetes appalachiana*, G4/S2?/NL/NL), found in small streams of this area.

Buffalo clover, a state rare herb, typically inhabits open woods, openings and roadsides (Radford et. al., 1968). In Virginia, buffalo clover is currently known from three locations in the coastal plain and piedmont regions.

Appalachia quillwort, widely distributed in the eastern United States, although it appears to be most frequently found at lower to middle elevation areas of the Appalachian Mountains in Pennsylvania. Is found to be emergent in aquatic habitat, shallow water of lakes ponds, and river shores. Leaves tend to extend to 30 cm long. Megaspores irregularly reticulate with more or less uneven ridges (Rhoads & Block, 2000).



Under a Memorandum of Agreement, DCR represents the Virginia Department of Agriculture and Consumer Services (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.

In addition, our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

Any absence of data may indicate that the project area has not been surveyed, rather than confirm that the area lacks natural heritage resources. 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, which may contain information not documented in this letter. Their database may be accessed from [http://www.dgif.virginia.gov/wildlife/info\\_map/index.html](http://www.dgif.virginia.gov/wildlife/info_map/index.html), or contact Shirl Dressler at (804) 367-6913.

DCR's Division of Chesapeake Bay Local Assistance has reviewed the Manassas National Battlefield Park Draft GMP and offers the following comments:

Prince William County has designated its entire jurisdiction as a Chesapeake Bay Resource Management Area and therefore the proposed general management plans must be consistent with the general performance criteria of the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations) 9 VAC 10-20-120 et seq. This would include disturbing no more land than necessary to provide for the proposed use, **saving indigenous vegetation to the maximum extent practicable** consistent with the proposed use, having a soil and water quality conservation assessment for lands retained in agriculture, and adhering to water quality protection procedures prescribed by the Virginia Department of Forestry best management practices especially with regard to timber harvesting. The use would be a change from silviculture, so the 100-foot buffer must be retained. All land disturbing activity exceeding 2,500 square feet shall comply with the requirements of the local erosion and sediment control ordinance. Additionally, stormwater management criteria consistent with the water quality protection provisions (§ 4 VAC 3-20-71) of the Virginia Stormwater Management Regulations (§ 4 VAC 3-20) shall be satisfied for all land-disturbing activity.

In addition to the general performance criteria for Resource Management Areas (RMAs), those areas that are designated as Resource Protection Areas (RPAs) shall be consistent with the development criteria for RPAs (§ 9 VAC 10-20-130), especially with respect to 9 VAC 10-20-130 3 that states, "To minimize the adverse effects of human activities on the other components of the Resource Protection Area, state waters, and aquatic life, a **100-foot wide buffer of vegetation** that is effective in retarding run-off, preventing erosion, and filtering nonpoint source pollution from runoff **shall be retained if present** and established where it does not exist."

The historic scene reconstruction activity (forest clearing) must avoid the 100-foot riparian buffers along all water-bodies with perennial flow and all forestry activities must be consistent with the *Virginia Forestry Best Management Practices for Water Quality* in order to be consistent with the *Chesapeake Bay Preservation Designation and Management Regulations*. The removal of the Route 29 bridge would be an exempt activity under 9 VAC 10-20-150 B 1 provided that the demolition would be 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.

Alternative B, while being the NPS preferred alternative, substantially reduces the forested cover within the park even if the 100-foot buffer is maintained as wooded, which is inconsistent with general performance criteria (9 VAC 10-20-120 et seq) of the *Chesapeake Bay Preservation Act & Regulations*.

Alternative C provides less impact on the wooded areas and therefore better complies with the *Chesapeake Bay Preservation Act & Regulations* with respect to saving indigenous vegetation to the maximum extent practicable. Both alternatives propose removal of the Route 29 bridge which would cause temporary impacts to Bull Run even with erosion and sediment control practices in place.

Alternative C placement of a new Visitor's Center on the East side of Bull Run would increase the impact by requiring a new bridge crossing as well, although some of the increase in impervious surface would be off-set by the removal of the Henry Hill Visitor Center. It appears that the better solution would be to use the Alternative C historic landscape rehabilitation proposal with an alternative site for the entrance to the park and Visitor Center that would not have an impact upon Bull Run by requiring placing a bridge over Bull Run. The Park Service should reconsider the location of the Visitor's Center along either of the Route 234 entrances, the southern Route 622 entrance, or the western Route 29 entrance to the park.

Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert S. Munson", written in a cursive style.

Robert S. Munson  
Planning Bureau Manager

Literature Cited

Cronquist Ph.D., Arthur and Henry A. Gleason, Ph.D. 1991. Manual of Vascular Plants of Northeastern United States and Adjacent Canada, Second Edition. The New York Botanical Garden. Bronx, N.Y. p.453.

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## COMMONWEALTH of VIRGINIA

### DEPARTMENT OF ENVIRONMENTAL QUALITY

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

Mailing address: P.O. Box 10009, Richmond, Virginia 23240

Fax (804) 698-4500 TDD (804) 698-4021

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L. Preston Bryant, Jr.  
Secretary of Natural Resources

David K. Paylor  
Director

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

### MEMORANDUM

**TO:** Charles H. Ellis, III, Environmental Program Planner

**FROM:**  Allen Brockman, Waste Division Environmental Review Coordinator

**DATE:** February 17, 2006

**COPIES:** Sanjay Thirunagari, Waste Division Environmental Review Manager; file

**SUBJECT:** Manassas National Battlefield Park Draft General Management Plan—DEQ Project # 06-031F

The Waste Division has completed its review of the Draft General Management Plan for Manassas National Battlefield Park. We have the following comments concerning the waste issues associated with this project:

Neither solid waste issues and sites nor hazardous waste issues and sites were addressed in the report. Nor did the report include a search of waste-related data bases. The Waste Division conducted a cursory review of its data files and determined that the facility is listed in EPA's RCRA Hazardous Waste database as a conditionally exempt, small quantity generator of hazardous waste: MANASSAS NATIONAL BATTLEFIELD PARK (EPA ID: VA8142300963). The following website may prove helpful in locating additional information for this identification number:  
[http://www.epa.gov/echo/search\\_by\\_permit.html](http://www.epa.gov/echo/search_by_permit.html).

Any soil that is suspected of contamination or hazardous or solid wastes that are generated, transported, disposed, stored, or treated, as defined in the Virginia Solid and Hazardous Waste Regulations must be tested and handled 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.

Any structures to be demolished, removed, or renovated should be checked for asbestos-containing materials (ACM) and lead-based paint (LBP) prior to those activities. 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.

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 Allen Brockman at (804) 698-4468.

DEPARTMENT OF ENVIRONMENTAL QUALITY  
DIVISION OF AIR PROGRAM COORDINATION

ENVIRONMENTAL REVIEW COMMENTS APPLICABLE TO AIR QUALITY

TO: Charles H. Ellis III

DEQ - OEIA PROJECT NUMBER: 06 - 031E

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

☐ CONSISTENCY DETERMINATION/CERTIFICATION

PROJECT TITLE: MANASSAS NATIONAL BATTLEFIELD PARK DRAFT GENERAL  
MANAGEMENT PLAN

DEQ-Office of Environmental  
Impact Review  
RECEIVED  
FEB 03 2006

PROJECT SPONSOR: DOI / NATIONAL PARK SERVICE

PROJECT LOCATION: ☒ OZONE NON ATTAINMENT AREA

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 5-40-5600 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:

Long range impact of the project on the air quality with in the park area is beneficial. However, being in an area of ozone non-attainment, all precautions are necessary to restrict the emissions of volatile organic compounds (VOC) and oxides of nitrogen (NOx) during construction. Closure of commuter traffic on Route 234 and 29 with in the park area is subject to satisfactory acceptance of the concerned Bypass Study.

K. S. Narasimhan  
(Kotur S. Narasimhan)  
Office of Air Data Analysis

DATE: February 3, 2006



**Ellis, Charles**

---

**From:** Bowden, John  
**Sent:** Thursday, February 23, 2006 10:56 AM  
**To:** Ellis, Charles  
**Subject:** Draft EIS #06-031F

NVRO comments regarding the Manassas National Battlefield Park Draft General Management Plan project sponsored by DOI/National Park Service are as follows:

The U.S. National Park Service (NPS) proposes to develop a General Management Plan to define the direction of the management of Manassas National Battlefield Park for the next 15-20 years. The Environmental Impact Statement (EIS) describes three alternatives with varying degrees of impacts proposed to surface waters (i.e. wetlands, streams, ponds) regulated by the Virginia Department of Environmental Quality (DEQ). Alternative A proposes no action and therefore proposes no impacts to surface waters. Alternative B is the preferred alternative and proposes no impacts to surface waters. Alternative C proposes impacts to surface waters. Based upon review of Map 3-2 and 4-1 of the EIS, both Alternatives B and C propose forest cuts to restore the historic landscape in areas that appear to also contain wetlands. Please note that the conversion of one wetland type to another (i.e. forested wetland to emergent wetland), is considered an impact by DEQ.

DEQ recommends conducting a wetland delineation of the proposed project area as the EIS indicated that the presence of surface waters was determined by reviewing National Wetland Inventory Maps. The National Wetland Inventory Maps do not represent the legal boundaries of wetlands and stream channels, and these maps are often significantly inaccurate. The actual boundaries of wetlands and stream channels regulated by the Virginia Water Protection (VWP) Permit Program are determined by a wetland delineation that is confirmed by the United States Army Corps of Engineers (USACE). NPS would need to contact the USACE to receive confirmation of the wetland delineation.

If Alternative C is pursued or if impacts to surface water are proposed, a VWP permit from DEQ will be required for the proposed impacts in accordance with 9 VAC 25-210-50 of the VWP Permit Program regulations. Upon receipt of a Joint Permit Application for the proposed surface water impacts, DEQ-VWP Permit staff will review the proposed project in accordance with VWP permit program regulations and current VWP permit program guidance.

**John D. Bowden**  
**Deputy Regional Director**  
**Department of Environmental Quality**  
**Northern Virginia Regional Office**  
**(703) 583-3880**  
**[jdbowden@deq.virginia.gov](mailto:jdbowden@deq.virginia.gov)**


If you cannot meet the deadline, please notify CHARLIE ELLIS at 804/698-4488 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:


MR. CHARLES H. ELLIS III  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL IMPACT REVIEW  
629 EAST MAIN STREET, SIXTH FLOOR  
RICHMOND, VA 23219  
FAX #804/698-4319

  
CHARLES H. ELLIS III  
ENVIRONMENTAL PROGRAM PLANNER

COMMENTS

This will acknowledge receipt of your transmittal letter with enclosures requesting Commission review of the above-referenced project.

Please be advised that the Marine Resources Commission, pursuant to Section 28.2-1204 of the Code of Virginia, has jurisdiction over any encroachments in, on, or over any State-owned rivers, streams, or creeks in the Commonwealth. Accordingly, if any portion of the subject projects involves any encroachments channelward of ordinary high water along natural rivers and streams, a permit may be required from our agency.

(signed)  Benjamin A. McBride (date) 02/22/06  
(title) Environmental Engineer  
(agency) Marine Resources Commission



**COMMONWEALTH of VIRGINIA**

**DEPARTMENT OF TRANSPORTATION**  
1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219-2000  
VirginiaDOT.org

**GREGORY A. WHIRLEY**  
ACTING COMMISSIONER

**RECEIVED**

**FEB 16 2006**

**DEQ-Office of Environmental  
Impact Review**

February 14, 2006

Mr. Charles H Ellis III  
Department of Environmental Quality  
Office of Environmental Impact Review  
629 East Main Street, Sixth Floor  
Richmond, VA 23219

Re: Manassas National Battlefield Draft General Management Plan

Dear Mr. Ellis:

Mr. Robert McDonald of the Virginia Department of Transportation has reviewed the draft General Management Plan (GMP) prepared by the National Park Service. The GMP outlines the existing conditions for visitor experience at the Manassas National Battlefield and describes the pros and cons of the two "build" alternatives considered. In terms of transportation impacts, the "no-action" alternative, which the National Park Service does not recommend, has virtually no impacts on our transportation network. The other two alternatives involve closing US 29 and Virginia Route 234, two arterials that presently traverse the Battlefield.

As the GMP correctly states, FHWA conducted a study of potential bypass routes around the Battlefield. Should one of those alignments be acceptable to the Commonwealth, US 29 and VA 234 might be closed so that present through traffic would be routed around the Battlefield instead of through it. Also, as correctly stated in the GMP, a heavy volume of traffic uses those roads – not only commuters but also commercial vehicles such as trucks from nearby Luck Stone Quarry. Closing those roads before an operational bypass is constructed is not acceptable due to the traffic impacts such closing would put on I-66, the only nearby arterial. Currently, I-66 is under construction to widen the facility due to the severe daily congestion it experiences. Accidents at the signalized intersection of US 29 and VA 234, cited in the GMP, have been reduced by the recent construction of left-turn lanes on all four legs of that intersection. As a final note, US 29, even through the Battlefield, is on the National Highway System and was designated as a "Congressional High Priority" road.



Thank you for the opportunity to comment on this project.

Sincerely,

A handwritten signature in cursive script that reads "Mary T. Stanley". The signature is written in black ink and is positioned above the printed name.

Mary T. Stanley

Environmental Engineer

Virginia Department of Transportation

(804) 786-0868



## COMMONWEALTH of VIRGINIA

**Department of Aviation**  
5702 Gulfstream Road  
Richmond, Virginia 23250-2422

Randall P. Burdette  
Director

**RECEIVED**  
FEB 03 2006  
DEQ-Office of Environmental  
Impact Review

V/TDD • (804) 236-3624  
FAX • (804) 236-3635

February 2, 2006

Mr. Charles H. Ellis III  
Department of Environmental Quality  
Office of Environmental Impact Review  
629 East Main Street, Sixth Floor  
Richmond, Virginia 23219

RE: Federal Project # 06-031F, Manassas National Battlefield Park Draft General  
Management Plan

Dear Mr. Ellis:

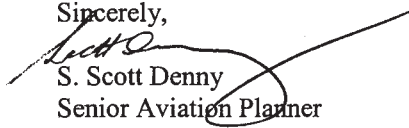
Thank you for providing the Virginia Department of Aviation with a draft copy of the Manassas National Battlefield Park Draft General Management Plan. Following our review staff compiled the following comments.

### General Comments

1. Any proposed development at the Manassas Battlefield Park should prohibit any Part 77 penetrations at the Manassas Regional Airport.
2. Any proposed development should avoid the congregation of large numbers of people in the approach and departure corridors at the Manassas Regional Airport.
3. Any proposed action should not include any development that would create glare, cause large quantities of dust or smoke, attract a large number of birds or pose any hazard to air navigation with regard to aircraft landing or departing the Manassas Regional Airport

If you have any questions regarding these comments please contact me at (804) 236-3632 at extension 110.

Sincerely,

  
S. Scott Denny  
Senior Aviation Planner



1. 4. 7

3060 Williams Drive, Suite 510  
Fairfax, Virginia 22031  
www.novaregion.org



**Northern Virginia Regional Commission**

Voice: 703-642-0700  
Fax: 703-642-5077

**RECEIVED**

**FEB 23 2006**

**DEQ-Office of Environmental  
Impact Review**

February 22, 2006

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**Vice-Chairman**  
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**Town of Vienna**  
Hon. M. Jane Seeman

(as of August 29, 2005)

Mr. Charles H. Ellis III  
Department of Environmental Quality  
Office of Environmental Impact Review  
629 East Main Street, Sixth Floor  
Richmond, VA 23219

Re: Manassas National Battlefield Park, Federal Project # 06-031F

The Northern Virginia Regional Commission (NVRC) staff has reviewed the application described above. It should be noted that the Manassas National Battlefield Park lies within the Occoquan River watershed. The Occoquan Reservoir in combination with the Potomac River supplies drinking water for 1.2 million people in Northern Virginia, 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 any land disturbing activities. 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.

Please be advised that the counties of Fairfax and Prince William have enacted a jurisdiction-wide Chesapeake Bay Resource Management Area (RMA) designation. This RMA designation requires that all development must comply with the local ordinance's stormwater quality requirements.

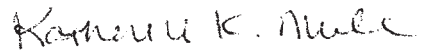
While certain activities are exempt from Resource Protection Area (RPA) requirements, staff recommends that activities associated with the "rehabilitation of historic vegetation patterns" comply with Virginia's Chesapeake Bay Regulations which include 100 foot wide vegetated buffers landward of RPA resources.

We would also suggest that, where possible, opportunities for retrofit of existing stormwater quantity facilities to stormwater **quality** facilities through any new construction activities should be explored, particularly infiltration practices associated with the principles of Low Impact Development.



Thank you for this opportunity to participate in the intergovernmental review process.

Sincerely,

A handwritten signature in dark ink, appearing to read "Katherine K. Mull".

Katherine K. Mull  
Senior Environmental Planner

Project: Draft General Management Plan for Manassas Battlefield  
National Park  
Sponsor: Department of the Interior/National Park Service



## County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

February 28, 2006

Dr. Robert K. Sutton, Superintendent  
Manassas National Battlefield Park  
12521 Lee Highway  
Manassas, VA 20109-2005

Dear Dr. Sutton:

Thank you for providing us with the opportunity to submit comments on the Draft General Management Plan/Environmental Impact Statement for Manassas National Battlefield Park. County staff has reviewed this document and, through this letter, is transmitting its comments.

The Draft General Management Plan/EIS presents three alternatives. Alternative A, the "No Action" alternative, would continue current management efforts at the park. The main roads in the park (U.S. Route 29 and Virginia Route 234) would remain open to through traffic.

Alternative B, the preferred alternative, would focus the visitor experience on the two individual battles and would orient separate visitor contact areas for each battle. In order to recreate the landscape that existed at the time of the two battles, approximately 327 acres of forested land within various areas of the park would be cleared in favor of an open grassland or shrub cover, and approximately 82 acres of open field and grassland areas would be reforested through natural succession. None of the clearing would occur near Fairfax County; indeed, approximately five acres of land along Bull Run would be restored to a forested condition. Existing roads through the park would be closed to through traffic, which would be routed around the park on the Battlefield Bypass (which itself has been the subject of a separate Environmental Impact Statement review and is not subject to this document). Most importantly from the standpoint of Fairfax County, the existing U.S. Route 29 bridge over Bull Run would be removed and would not be replaced.

Alternative C would focus the visitor experience on key "defining" events of the battles as opposed to a focus on the two distinct battles. The existing visitor center would be removed and replaced by a new visitor center near Stone Bridge and the eastern park boundary; maps within the document identify the location of the new visitor center east of Bull Run, in Fairfax County, although it is clear from the document that neither a specific site nor a design concept have been determined—the need for a feasibility study is recognized on page 56 of the document, and page 124 notes that the siting decision will depend, at least in part, on the alignment that is selected for the Battlefield Bypass. The existing U.S. Route 29 bridge over Bull Run would be removed but would be replaced with a new bridge; Map 2-6 indicates that the new bridge would be located to the south of the current bridge. Traffic on this road, as well as on Virginia Route 234, would be

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12000 Government Center Parkway, Suite 552  
Fairfax, Virginia 22035-0066  
703-324-2531, TTY 703-222-5494, Fax 703-324-3956  
[www.fairfaxcounty.gov](http://www.fairfaxcounty.gov)

Dr. Robert K. Sutton  
Page 2

limited through controlled access points; through traffic would be routed along the aforementioned Battlefield Bypass. Approximately 72 acres of trees would be cleared to provide for "view corridors."

Our comments focus on two issues of primary concern to Fairfax County: (1) transportation considerations associated with the possible removal of the U.S. Route 29 bridge over Bull Run and the closure of Routes 29 and 234 to through traffic; and (2) for Alternative C, the possible location of a new visitors center within Fairfax County, near Stone Bridge.

### Transportation Issues

Both Alternative B and Alternative C assume the construction of the Manassas National Battlefield Park Bypass, the prohibition of through traffic on U.S. Route 29 and Virginia Route 234, and the removal of the existing U.S. Route 29 bridge over Bull Run at the entrance to the Park. However, only Alternative C includes the provision of a new replacement bridge for Route 29.

U.S. Route 29 now functions as a key direct route that could be needed for rapid emergency evacuation. In his December 5, 2005 letter to the Federal Highway Administration (pertaining to the proposed Manassas National Battlefield Bypass), Gerald E. Connolly, Chairman, Fairfax County Board of Supervisors, conveyed the Board's position that "...existing Route 29 should remain available for emergency evacuation purposes even if through traffic is ultimately rerouted for normal operations." As noted on page 66 of the document, the construction of a new bridge across Bull Run would have adverse environmental consequences; for this reason, consideration should be given to retaining the existing bridge. Should, however, it be determined, either for Alternative B or Alternative C, that the existing Route 29 bridge over Bull Run ought to be removed, then a new replacement bridge should be constructed in such a way as to preserve U.S. Route 29 as a viable rapid emergency evacuation route.

Furthermore, while the December 5, 2005 letter conveyed the support of the Fairfax County Board of Supervisors for *refined* Alternative D as the preferred location corridor for a four-lane limited access roadway for the Manassas National Battlefield Bypass, the letter also stated that "...support for this location corridor should not be construed, however, as support for the closure of Routes 29 or 234 through the Battlefield Park until and unless sufficient analysis has been completed and alternative replacement facilities have been completed and opened to traffic." The letter cited the Board's understanding that additional analysis would be forthcoming, including a thorough review of the refined Alternative D recommendation, additional information on the transportation effects on local roadways, a reanalysis of traffic impacts of the Battlefield Bypass assuming the selected "West Two CBA" alignment for the Tri-County Parkway, provisions for additional citizen participation and input, and the resolution of outstanding Fairfax County Park Authority issues. These issues should be resolved satisfactorily before any decision is made regarding the closure of Route 29 or Route 234 to through traffic.

Dr. Robert K. Sutton

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Both Alternative B and Alternative C are predicated on the closure of Routes 29 and 234 to through traffic and the routing of through traffic onto a new Battlefield Bypass. The environmental impacts associated with the Battlefield Bypass are, therefore, directly related to these two alternatives, and these impacts should be recognized and considered in the adoption of a management alternative for the park. For this reason, we feel that it would be premature to take action in favor of either Alternative B or C until the overall impacts of the Battlefield Bypass project and these two alternatives can be considered comprehensively. An alternative approach would be the development of interim management alternatives for Alternative B and Alternative C that would (1) allow the park to move forward with management activities that are unrelated to the need for road closures; and (2) recognize the need to keep existing Routes 29 and 234 open to through traffic until all issues associated with the proposed Battlefield Bypass are resolved and the new highway is constructed and operational (i.e., the interim alternatives would not be predicated on road closures). If one or more interim management options cannot be developed, we would recommend a delay in action on the adoption of a management plan for the park until the process outlined in the December 5, 2005 letter from Chairman Connolly (relating to the Battlefield Bypass) has been completed (resolution of issues with the Fairfax County Park Authority, citizen involvement, completion of additional traffic studies, and coordination and review of these studies with Fairfax County).

#### Alternative C Visitor Center

Page 27 of the document states: "The relocation of the visitor center to the east side of the park in alternative C could have a localized impact on the land use of adjacent properties. However, only negligible impacts would be expected because the surrounding area is already quite built up commercially. Overall, the alternatives proposed would have negligible impacts on land use." We take issue with this statement, as the areas in Fairfax County immediately east of Bull Run near U.S. Route 29 are generally rural in character (with the exception of an industrial area including and near the Luck Stone Quarry) with some of the lowest development densities in Fairfax County. In keeping with this character, Fairfax County's Comprehensive Plan contains the following guidance for the Stone Bridge Community Planning Sector (page 66 of the Bull Run Planning District section of the Area III Plan, as amended through June 20, 2005), which includes the area in question:

1. *The land on the southwest perimeter of the County, adjacent to Loudoun County and Prince William County, lying generally along Bull Run and the public parkland associated with Bull Run has remained for the most part open and undeveloped and has a rural character. It is planned for residential development at .1-.2 dwelling unit per acre and public parkland. This is in conformance with the findings of the Occoquan Basin Study. The present very low density development which characterizes this area should remain intact to protect its natural wildlife and water quality.*
2. *Non-residential uses requiring special exception or special permit approval should be rigorously reviewed. In general, these uses, if permitted at all,*

Dr. Robert K. Sutton

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*should only be located at the boundary of Low Density Residential Areas and Suburban Neighborhoods or where their impact on existing residences is minimal. These uses should be granted only if the following conditions are met:*

- *Access for the use is oriented to an arterial roadway;*
- *The use is of a size and scale that will not adversely impact the character of the area in which it is located; and*
- *The use is designed to mitigate impacts on the water quality of the Occoquan Reservoir.*

A visitor center with extensive parking and traffic flow could create a marked contrast with the existing character of this area and could conflict with the Comprehensive Plan guidance cited above. Absent more specific guidance regarding the location, design, water quality controls, protection of undisturbed open space, screening and buffering that would be associated with a new visitor center, we feel that any statements regarding land use impacts of Alternative C would be premature.

Another critical issue pertaining to a new visitor center east of Bull Run is wastewater disposal. Areas in and near the Battlefield Park in Fairfax County are outside of the county's Approved Sewer Service Area. Extensions of sanitary sewer lines into this area would conflict with the Comprehensive Plan and long-established county policy regarding sewer service. Further, soils in this area are generally poorly suited for septic systems. It is difficult, therefore, to conceive of a site near Stone Bridge that could accommodate a visitor center without creating substantial conflicts with county policy.

We would further advise the National Park Service to incorporate considerations of Fairfax County's Chesapeake Bay Preservation Ordinance, Water Supply Protection Overlay District and Environmental Quality Corridor policy into any siting and design decisions for a new visitor center, should a location in Fairfax County be pursued. The area in and near the park in Fairfax County is located within a larger area that was rezoned in 1982 for five-acre lot residential development in order to protect the Occoquan Reservoir (one of the county's primary sources of drinking water). County staff is available to provide guidance regarding the locations of Resource Protection Areas and Environmental Quality Corridors and would welcome coordination with the National Park Service regarding these issues. We would also welcome coordination regarding stormwater management best management practices. Stormwater management BMPs and Resource Protection Area protection consistent with Prince William County's requirements should be pursued if a new visitor center will be located within Prince William County.

Finally, Fairfax County's Zoning Ordinance recognizes the historic significance of Stone Bridge through its establishment of the Bull Run Stone Bridge Historic District. Obviously, the



Dr. Robert K. Sutton  
Page 5

protection of the historic integrity of this area is of vital concern to the National Park Service, and we trust that any proposal to construct a new visitor center would be sensitive to this concern; page 136 of the document clearly commits to sensitivity in the siting and design of the facility. That being said, we recommend that, if the new visitor center is to be constructed within this Overlay District, conceptual and detailed development plans be provided to the county's Architectural Review Board for review and recommendation prior to any plan approval by the National Park Service.

The document does not identify potential sites for a new visitor center; there is only a concept as to the general location of the facility somewhere near the eastern park boundary. If this idea is to be pursued further, we encourage the National Park Service to identify potential sites and coordinate with us in evaluating feasibility issues.

#### Other Comments

The Manassas National Battlefield Park is located within the watershed of the Occoquan Reservoir, which is one of Fairfax County's, and the region's, major sources of drinking water. The undeveloped character of the park serves to provide substantial water quality benefits; we encourage park managers to further the park's environmental stewardship function through careful attention to erosion and sediment control for any land that will be temporarily denuded (e.g., clearing of forested areas, possible clearing and grading for a new visitor center, bridge removal; possible construction of a new bridge over Bull Run), the provision of stormwater management best management practices for any development that is pursued (e.g., parking areas), and land management efforts that serve to ensure the retention of desired cover types while minimizing the use and runoff of fertilizers and pesticides.

On page 66 of the document, it is noted that the forest clearing for Alternative B "would not be implemented in riparian and wetland areas." Yet a perusal of Map 4-1 (which identifies areas to be cleared) and Map 3-2 (which identifies water resources and wetlands) suggests that such impacts may occur in places. Further, while page 67 commits to the retention of riparian buffers along all streams, it indicates that some of these buffers may be maintained as shrub/grass buffers (although it is not stated if any riparian forest areas will be converted to a shrub/grass cover). Page 116 states that "riparian vegetation within the perimeters of designated cut areas would be maintained." Clarification should be provided, and efforts should be taken to avoid clearing of trees along streams to the extent possible.

Fairfax County Park Authority staff has noted that the Park Authority is currently completing the draft Sully Woodlands Regional Master Plan, which is anticipated to be available for public review in mid-March. It is anticipated that the draft plan will recommend trail connections and the development of coordinated interpretive opportunities with the Manassas National Battlefield Park. Consistent with this recommendation, we recommend that the National Park service provide trail connections across Bull Run from the proposed First Manassas Automobile and



Dr. Robert K. Sutton  
Page 6

Bicycle tour route and the existing interpretive hiking routes and equestrian trails to Sully Woodlands.

I again thank you for providing us with the opportunity to review and comment on proposed changes at the Manassas National Battlefield Park. I encourage you to coordinate with Noel Kaplan, Senior Environmental Planner, Department of Planning and Zoning, on the issues identified in this letter. Noel can be reached at 703-324-1380.

Sincerely,

A handwritten signature in dark ink, appearing to read 'AHG', followed by a horizontal line.

Anthony H. Griffin  
County Executive

AHG/NHK

cc: Board of Supervisors  
Robert A. Stalzer, Deputy County Executive  
James P. Zook, Director, Department of Planning and Zoning  
Katharine D. Ichter, Acting Director, Department of Transportation  
Michael A. Kane, Director, Fairfax County Park Authority



## Coalition for Smarter Growth

Choices for our communities  
Choices for our region

Dr. Robert K. Sutton, Superintendent,  
Manassas National Battlefield Park  
12521 Lee Highway  
Manassas, VA 20109-2005

Dear Superintendent Sutton:

The Coalition for Smarter Growth, a network of major regional environmental and smart growth organizations, submits the following comments regarding the Draft Environmental Impact Statement for the General Management Plan update for Manassas National Battlefield Park. We also wish to incorporate the comments that we previously submitted to the DEIS for the proposed Battlefield Bypass.

The DEIS for the GMP treats the Battlefield Bypass as an integral component of Alternatives B and C, linked to the closure of Routes 29 and 234 through the park. The GMP is dependent upon and built around those road closures. Therefore the impacts of the Battlefield Bypass should be fully accounted for in the DEIS. Yet, while accounting for the potential positive impacts of the closure of these roads and the construction of the bypasses, the DEIS for the GMP completely fails to account for the potential adverse impacts of the new bypass on the Battlefield. This gives an incomplete picture of Alternatives B and C.

In addition, another alternative should have been considered for the GMP that did not involve bypass highways, but instead included a range of solutions as delineated in our comments on the Battlefield Bypass DEIS. Those solutions would include local road upgrades such as shoulders and roundabouts that could handle local traffic and be constructed to protect the historic landscape as has proven successful in the United Kingdom.

The Battlefield Bypass would run parallel to Pageland Road and include an elevated interchange according to the DEIS for that project. Moreover, the north-south alignment for the Battlefield Bypass has become the corridor of choice for the Tri-County Parkway and the 234 Bypass. These would also add yet another segment to the proposed Western Transportation Corridor that would initially link to the 234 upgrade to I-95 and north to Route 7, but has been proposed to include Potomac River Bridge crossings at either end. This outer beltway and the multiple purposes proposed for the narrow Pageland Road corridor could mean a road that is not four lanes, but at least six lanes, and would carry heavy truck traffic. Yet, none of this would be a foregone conclusion if the National Park Service and the Manassas Battlefield Park were to make a stronger case about the negative impacts of these highways. Those negative impacts are entirely missing from the analysis in the DEIS for the GMP and inadequately addressed in the DEIS's for the Battlefield Bypass and Tri-County Parkway.

*4000 Albemarle Street, NW, Suite 310  
Washington, DC 20036  
202-244-4408; 202-244-4438(fax)  
[www.smartergrowth.net](http://www.smartergrowth.net)*

There are a number of issues and impacts that are not considered by the DEIS for the GMP and we request their inclusion and analysis.

- 1) The DEIS states as a major goal of the GMP to maintain “the rural and agrarian character of views outside the park” and to minimize “modern intrusions into the historic landscape.” Yet major highway bypasses, especially along the western boundary would destroy the rural and agrarian character of the Pageland Road corridor, harm the views from the western side of the Battlefield, and certainly constitute a modern intrusion into the historic landscape.
- 2) The DEIS acknowledges the negative impact of commercial development on the southern boundary of the Park, development which followed the construction of I-66. Yet, it does not analyze induced development along the new N-S and E-W bypass corridors.
- 3) The DEIS claims that “overall the alternatives proposed would have negligible impacts on land use. Therefore, land use was dismissed as an impact topic.” Yet, I-66 contributed to land development on the southern boundary and the Battlefield Bypass as included in Alternatives B and C would do the same to the western and northern boundaries of the Battlefield. Potential changes to land use in these areas and their impact on the Battlefield environment should certainly be considered.
- 4) The purposes of the GMP include more thorough interpretation of the Second Battle of Manassas including the opening battle at the Brawner Farm and the nearby Stuart’s Hill. This battle took place adjacent to Pageland Road and certainly must have included Confederate troop movements from areas which would be bisected by the Battlefield Bypass.
- 5) The DEIS acknowledges the impact of sound from I-66 outside the southern boundary of the park, but not the impact of sound from heavy trucks and other vehicles on the Battlefield Bypass.
- 6) The DEIS includes no discussion of the expanded historic district west of Pageland Road, historic resources in that district or the impact of the bypasses on those resources. It does mention significant troop movement near Pageland and the Warrenton Turnpike, an area shown in the Battlefield Bypass DEIS to be very close to major interchange expansion for the Battlefield Bypass. A program to use conservation easements and other measures to protect and link the Battlefield to Conway Robinson State Forest would protect historic areas and preserve the setting and tranquility of the site of the Second Battle of Manassas.
- 7) The Battlefield is acknowledged as a unique habitat protecting wildlife in the face of significant regional development, yet the wildlife benefits of providing a connected corridor to the 400 acre Conway Robinson State Forest (located just ¼ mile west of the Battlefield) are not acknowledged nor is the harm to wildlife moving between these areas considered. Movement is certainly easier across a two lane road than a four to six lane highway.
- 8) The Battlefield Bypass and Tri-County Parkway are described as part of a major long-term improvement for traffic, yet this is not substantiated. In fact those studies show little change in traffic and actual increases in vehicle miles traveled. Induced development could in fact worsen traffic in the park environment.
- 9) Without binding commitments to close the roads through the park, the addition of the Battlefield Bypass and other highways would in fact magnify the negative impacts.

The Battlefield Bypass (and Tri-County Parkway) is described as part of Alternatives B and C, therefore their negative impacts must be accounted for and additional road alternatives considered.

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The DEIS for the GMP tells an incomplete story of conditions and potential changes to the western side of the Battlefield that would result from construction of these highways.

We urge the NPS and MNBP to support alternatives to four and six lane highways around the Battlefield and to consider these alternatives in the GMP analysis.

Thank you.

Sincerely,

(via email; verify at 202-244-4408 ext 3#)

Stewart Schwartz  
Executive Director

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## **LIST OF AGENCIES AND ORGANIZATIONS TO WHICH THIS DOCUMENT WAS SENT**

### **FEDERAL AGENCIES**

Advisory Council on Historic Preservation  
Federal Highway Administration  
Federal Transit Administration  
U.S. Army Corps of Engineers, Norfolk  
District  
U.S. Department of Agriculture  
    Natural Resources Conservation Service  
    U.S. Forest Service  
U.S. Department of Commerce  
    National Oceanic & Atmospheric  
    Administration, National Marine Fisheries  
    Service, Northeast Region  
U.S. Department of the Interior  
    Fish and Wildlife Service, Virginia Field  
    Office  
    National Park Service  
    Office of Environmental Policy and  
    Compliance  
    Office of Environmental Project Review  
U.S. Environmental Protection Agency

### **U.S. SENATE**

The Honorable Mr. James Webb  
The Honorable Mr. John Warner

### **U.S. HOUSE OF REPRESENTATIVES**

The Honorable Mr. Tom Davis  
The Honorable Mr. Frank Wolf

### **STATE OFFICIALS**

The Honorable Tim Kaine, Governor of the  
    Commonwealth of Virginia  
The Honorable Charles Colgan, Senator,  
    Virginia General Assembly  
The Honorable Robert Marshall, House  
    Member, Virginia General Assembly

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Virginia Department of Environmental Quality  
Virginia Department of Forestry  
Virginia Department of Game and Inland  
    Fisheries

Virginia Department of Historic Resources  
    (State Historic Preservation Office)  
Virginia Department of Transportation  
Virginia Marine Resources Commission  
Virginia Outdoor Foundation

### **REGIONAL AGENCIES AND ORGANIZATIONS**

National Capital Planning Commission  
Northern Virginia Regional Commission  
Northern Virginia Regional Park Authority  
Northern Virginia Soil and Water  
    Conservation District  
Northern Virginia Transportation Authority

### **COUNTY AND LOCAL AGENCIES AND OFFICIALS**

Fauquier County Administrator  
Fairfax County  
    Board of Supervisors  
    Department of Planning and Zoning  
    Department of Transportation  
Loudoun County  
    Administrator  
    Board of Supervisors  
    Director of Transportation  
Prince William County  
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    Department of Public Works  
    Soil and Water Conservation District  
    Transportation Division  
Manassas, Virginia, local government  
Manassas Park, Virginia, local government  
Town of Haymarket, local government

### **ORGANIZATIONS AND BUSINESSES**

Bull Run Civil War Roundtable  
Civil War Preservation Trust  
Coalition for Smarter Growth  
Gate Post Estates Home Owners Association  
National Trust for Historic Preservation  
Piedmont Environmental Council  
Sudley Springs-Catharpin Civic Association

