

National Park Service  
U.S. Department of the Interior

Prince William Forest Park  
Triangle, Virginia



# Prince William Forest Park

## Environmental Assessment/Assessment of Effect Rehabilitate 14 Structures in Cabin Camp 4

August 2009





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## **PURPOSE AND NEED FOR ACTION**

Prince William Forest Park, a unit of The National Park Service (NPS), in order to preserve historic structures and improve the visitor experience, proposes to perform general maintenance on 13 historic cabin camp buildings and upgrade historic Staff Quarters Building #85 at Cabin Camp 4 (see Figure 1). These cabins were constructed in the 1930s by the Civilian Conservation Corps (CCC) and are included in the Camp Pleasant Historic District (referred to as Cabin Camp 4 from this point forward) on the National Register.

The roof systems on all thirteen buildings are over twenty years of age and as a result most shingles have deteriorated, which has increased moss growth. The exterior siding, sill beams, windows, doors, and porches have sustained continuous damage from water infiltration and pest infestation. In addition, the present plumbing and electrical systems have not been replaced to meet current building codes.

Building # 85 is also suffering from many of the same issues. The roof system, exterior siding, sill beams, windows, doors, and porch would undergo repair or replacement. The plumbing and electrical systems would also be updated to meet building codes. In addition, a kitchenette would be installed to allow for the building to be utilized as seasonal housing.

This environmental assessment (EA) analyzes the impacts that would result from the implementation of the No Action alternative (Alternative A) and the action alternative (Alternative B). The action alternative proposes to complete rehabilitation work on the roof systems of all fourteen buildings and, as needed, replace exterior siding, sill beams, windows, doors, and porches that have been damaged by insect infestation and water infiltration. Plumbing and electrical systems would also be updated as needed to comply with the most current building code regulations. In addition, a small kitchenette would be installed in Building # 85 in order to make it available to park seasonal staff as seasonal housing. The No Action alternative would not change the current management of Cabin Camp 4. Continual maintenance on the structures would continue as needed to keep them safe for visitor use.

This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 and implementing regulations, 40 CFR 1500-1508, and NPS *Director's Order 12 and Handbook, Conservation Planning, Environmental Impact Analysis, and Decision-making* (NPS 2001). Compliance with Section 106 of the National Historic Preservation Act of 1966 has occurred in conjunction with the NEPA process.

### **PURPOSE OF THE ACTION**

The purpose for taking action is to preserve historic structures of Cabin Camp 4 in a manner that protects the resources and values of Prince William Forest Park, and that:

- Preserves historic structures;
- Improves the quality of the visitor experience;
- Improves public safety by updating electrical systems to meet safety regulations; and
- Addresses need for additional seasonal housing.

### **NEED FOR THE ACTION**

The proposed action of rehabilitation of fourteen historic structures is needed because:

- The fourteen historic cabin camp buildings have failing roof system and deteriorating posts, beams, flooring, and sidings;
- Visitor experience is diminished by the poor state of facilities offered;
- Visitor safety concerns caused from outdated electrical equipment; and.
- Currently, seasonal housing in the park is limited.

## **PURPOSE AND SIGNIFICANCE OF THE PARK**

Located in the southeast corner of Prince William County, Virginia, the 15,000 acre Prince William Forest Park is 32 miles south of Washington, DC, near the communities of Dumfries and Triangle. The Park is bordered by VA 234 to the north and east, and VA 619 to the south and west. The Park is within two physiographic provinces, the Piedmont and the Coastal Plain. These provinces exist in the middle of the northern and southern climates, a transition zone that supports many species in the outer limits of their ranges. The forests and waterways of the Park create a wide diversity of habitat, vegetative communities, and species composition not generally found in any single forest type. Prince William Forest Park represents one of the largest examples of undeveloped land in the region, and is the third largest National Park in the state of Virginia, and the largest Piedmont forest in the National Park System. For these reasons, the Prince William Forest Park is a significant natural resource (NPS, 1999; NPS, 2004). Within an hour's drive of more than four million people, Prince William Forest Park provides a rare undeveloped landscape of mixed hardwood forest and offers the visitor a variety of opportunities to experience the outdoors. The Park hosts over 200,000 visitors annually (NPS, 2008b), with popular recreational activities that include camping, hiking, picnicking, and biking. The Park offers 37 miles of hiking trails, three wooden bridges, five actively used cabin camps built by the Civilian Conservation Corps (CCC), the Cabin Branch Pyrite Mine, 1800s era homesteads and farms, and more than 25 miles of streams. Four of the CCC cabin camps are listed on the National Register of Historic Places as historic districts (NPS, 1999; NPS, 2004).

## **ESTABLISHMENT**

The Park land was originally designated as the Chopawamsic Recreation Demonstration Area (RDA) beginning in 1933 (NPS, 1999). During the 1930s, the CCC built roads, cabin camps, and lakes for urban middle and lower income populations (NPS, 1986). With the creation of the U.S. Office of Strategic Services (OSS), nine secret training areas were established within the Park to train spies and radio operators in covert military intelligence operations. The cabin camps were used for group camping, especially by charitable organizations from Washington, D.C., and are still used by the public today for group camping (NPS, 1986). In 1934, strict conservation practices and land acquisitions were initiated.

The Chopawamsic RDA was turned over to the NPS in 1936 through an Executive Order signed by President Franklin D. Roosevelt. By this time, most of the recreational developments were in place, and the landscape was exhibiting signs of restoration through natural succession. Congress changed the name of the Park to Prince William Forest Park in 1948. At this time, the conditional transfer of control of 5,000 acres of the adjacent Quantico Marine Corps Base occurred with the understanding that the water quality of the Quantico Creek would continue to be protected. Today, a primary management objective of Prince William Forest Park is the protection of the Quantico Creek watershed through a combination of land acquisition, exchanges and transfers, internal land use practices, and active cooperation with adjacent property owners. As described in the Park's General Management Plan, Prince William Forest Park primarily serves as a "cradle" for local indigenous species and as a natural human retreat from a burgeoning urban area (NPS, 1999).



## Cabin Camp 4 Rehabilitation Project

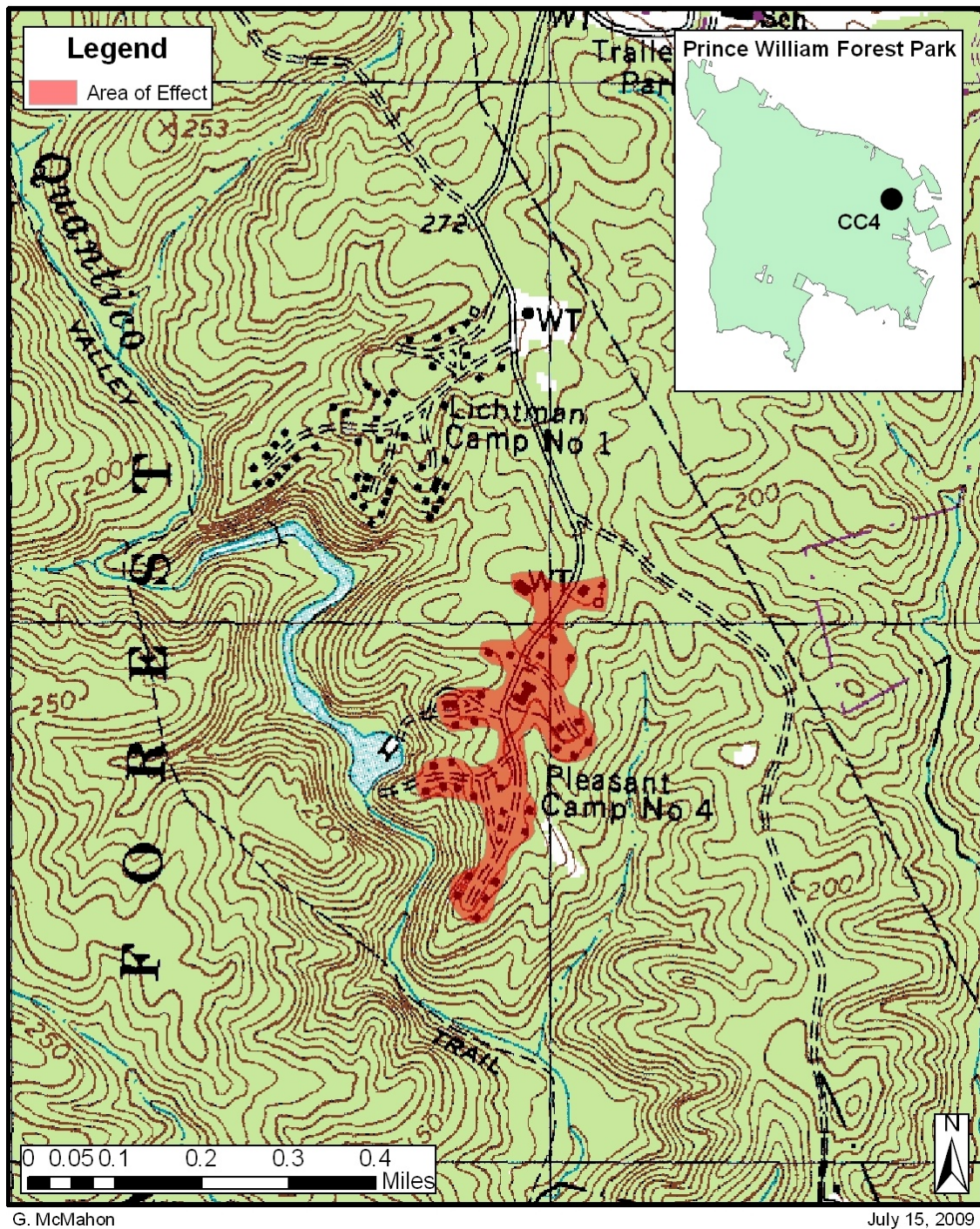


Figure 1 - Project Area

## SCOPING

Scoping refers to the process used to gather information from the public and interested agencies to define project issues, alternatives, and data needs. Internal scoping typically includes a multidisciplinary team of NPS personnel along with interested federal, state and local agency representatives. External scoping is the process used to gather public input and may include scoping sessions, direct mailings, newsletters, ads, or open houses.

The park staff has held several meetings to develop alternatives for the project. On May 7, 2009 an interdisciplinary park team met to discuss possible alternatives for the Rehabilitate 14 Structures in Camp Pleasant Historic District. The participants of this site visit conducted a walk-through of all the cabins slated for rehabilitation. Maintenance staff identified the features of each cabin to be repaired as identified by the scope of the project. The Park team also visited cabins that were recently repaired from similar deterioration. The team was shown examples of rehabilitated features including: roof systems, sill beams, waney board siding, electrical systems, fire alarm systems, wood flooring, exterior stain/sealant.

The participants discussed the process of rehabilitation and the types of tools and materials that will be used in the project. Causal factors leading to the deterioration was discussed, and mitigation was identified to prevent future deterioration and/or slow the rate of deterioration. Photo documentation was collected by the team.

On May 14, 2009 an internal meeting was held in the Park Headquarters Building with park staff and National Capital Region Cultural Resource Specialists. The participants discussed Cabin Camp 4 Building #85 ADA issues including a ramp to the porch. Participants also discussed the installation of a kitchenette and alternative types of appliances including a gas stove, microwave, hotplate, and/or mini-fridge. Fire suppression was identified as necessary equipment to accompany a kitchenette. The regional Historic Architect was identified as necessary consulting party for this improvements/ changes to Building #85.

The NPS initiated external scoping for this project, as well. On May 1, 2009, a press release announcing the ARRA project was posted on the park website to initiate public involvement and obtain community feedback on the proposed action. To this date, no comments, letters, or emails have been received regarding this project.

## ISSUES

Issues describe problems or concerns associated with current impacts from environmental conditions or current operations, as well as problems that may arise from the implementation of any of the alternatives. Potential issues associated with this parking development project were identified by the public, park staff, and input from other agencies consulted.

The primary concern of the park, as identified during the internal scoping meetings, is to rehabilitate the park historic structures and ensure their continued use and enjoyment for park visitors. Other identified issues and concerns are listed below.

**Extend life-cycle maintenance of historic cabin camps** - Presently, these buildings are suffering from failing roof systems, structural components, utilities, and features. Completing this rehabilitation work would extend the life of these buildings to allow for their continued use in the future.

**Improve safety in cabin camps** - Currently, the electrical panels in many of the buildings are out of date and are currently not up to code. The Federal Pacific Equipment (FPE) panels would be replaced with electrical systems that meet current standards. In addition, a fire extinguisher would be installed in Building #85 to provide additional fire suppression support.

**Limit closure of cabin camp buildings** -While the action is being completed, Cabin Camp 4 would be temporarily closed to campers. It is expected that the closure would last at least 7 months of the normal operating season for cabin camp rental. This could increase the number of rentals in other cabin camps, as well as group, tent, and backcountry camping options.



## IMPACT TOPICS

The following impact topics are discussed in the “Affected Environment” chapter and analyzed in the “Environmental Consequences” chapter. The topics are resources of concern that could be beneficially or adversely affected by the actions proposed under each alternative and were developed to ensure that the alternatives are evaluated and compared based on the most relevant resource topics. These impact topics were identified based on the following: issues brought up during scoping, federal laws, regulations, executive orders, NPS 2006 Management Policies, and NPS knowledge of limited or easily impacted resources. A brief rationale for the selection of each impact topic is given below, as well as the rationale for dismissing specific topics from further consideration.

**Historic Structures/Districts** - All fourteen structures were built by the Civilian Conservation Corps in the late 1930s and are included on the National Register of Historic Places (NPS, 2009b). Under the No Action alternative the historic structures would not be rehabilitated at this time. Maintenance would occur as funding became available on an on-going basis. In the action alternative, Cabin Camp 4 would be temporarily closed to visitor rental during the construction process; however other cabin camps would remain open for visitor use. After the action would be completed, visitors could enjoy safe and structurally secure buildings. The action alternative would allow for the historic structures to be rehabilitated using preapproved NPS methods for repairing historic structures. In addition, a kitchenette would be installed in Building #85 with reversible components in effort to keep the historic integrity of the building’s structure. As a result of the potential impacts to historic structures by taking No Action or the rehabilitation of 14 cabin camp buildings and upgrades, as well as impacts to visitors, historic structures is addressed as an impact topic in this EA.

**Visitor Use and Experience** - The fourteen structures considered for rehabilitation are presently being rented out and utilized by park visitors. Under the No Action alternative the visitor experience and safety would continue to decline based on the dilapidating facilities and the outdated electrical and plumbing systems. Further, visitor use would be limited on an on-going basis when the park would be able to conduct rehabilitation work or make improvements. The action alternative would provide beneficial impacts to the visitor use and experience by providing updated roofing, interior, and exterior. Beyond the cosmetic repairs, the electrical and plumbing would be upgraded to ensure visitor safety. The action alternative would return a safe recreational facility for visitors. In addition, Building #85 would be made available for seasonal employees and/or researchers. An American Disability Act (ADA) compliant ramp has been proposed for installation at this building to accommodate guests with special needs. Usage of these cabins would be closed for a period up to 7 months during construction. As a result of the potential impacts from both the No Action and proposed action alternatives, impacts to visitor use and experience are addressed as an impact topic in this EA.

**Park Operations and Management** - Under the No Action alternative the park maintenance workers would continue to make small repairs on the deteriorating structures on a continual basis. The cabin camps would be rented out and maintenance would occur as funding became available. The action alternative would keep Cabin Camp 4 closed temporarily for a period of up to seven months. In addition, no camping fees would be collected during this time. This closure might increase the use of the other available camping options. The action alternative would also provide beneficial impact to park operations because less continual maintenance would occur. Operations would resume upon the completion of the project. For these reasons, this impact topic was carried forward for further analysis in this EA.

## IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS AND CONSIDERATION

The following impact topics were eliminated from further analysis in this EA. A brief rationale for dismissal is provided for each topic. With mitigation, potential impacts to these resources would be negligible, and localized.

**Soils, geology, and topography** - The Park contains unique soil types and geologic resources due its location between the Coastal Plain and Piedmont physiographic provinces. Undulating topography, steep

sided valleys and narrow ridge tops characterize the landscape within PRWI. In addition to the geological diversity, the Park contains large pyrite deposits. The best example of the mineral deposits is at the confluence of the north and south branches of Quantico Creek, where crystalline formations can be seen.

This project would result in very minimal ground disturbance and would not occur in any area where the soil has not been previously disturbed. No geological formations are present within the project area. In addition, the existing topography in the area would not be altered by the proposed project. Since the impacts to these resources would be negligible under either alternative, this impact topic has been dismissed.

**Vegetation** - The park contains a wide array of plant species. There are at least two distinct types of forest ecosystems in the upland areas of the park. On the ridges and upper slopes is a mixed oak (*Quercus* spp.) forest, and on the lower slopes above the floodplain is a mesic hardwood forest. Some common understory vegetation includes dogwood (*Cornus* spp.), redbud (*Cercis canadensis*), mountain laurel (*Kalmia latifolia*), spotted wintergreen (*Pyrola* sp.), and sassafras (*Sassafras albidum*). Ferns, mosses, vines, briers, and numerous wildflowers form the groundcover (NPS, 2008a). Within the cabin camps, Native vegetation has been disturbed by soil compaction and trampling, which has resulted in soil compaction and some vegetation loss has occurred. Because these areas of impact to vegetation are concentrated within the cabin camps, which are highly used by visitors, the overall adverse impacts to vegetation would be less than minor.

In addition, the action alternative does not include the removal of any vegetation and minimal ground disturbance. Because the impacts to vegetation would be less than minor under the no action or action alternative, this impact topic was dismissed from further analysis in this EA.

**Water Quality** - The 1972 Federal Water Pollution Control Act, as amended by the Clean Water Act of 1977, is a national policy to restore and maintain the chemical, physical, and biological integrity of the nation's waters, enhance the quality of water resources, and to prevent, control, and abate water pollution. The NPS 2006 Management Policies provides direction for the preservation, use, and quality of water originating, flowing through, or adjacent to park boundaries. The NPS seeks to restore, maintain, and enhance the water quality within the parks consistent with the 1972 Federal Water Pollution Control Act, as amended, and other applicable federal, state, and local laws and regulations. This project would result in minimal effects on the water quality and would be mitigated to prevent further effects. The closest water body to the project site is located approximately 40 meters (131 feet) from the C – Unit in Cabin Camp 4. The minimal ground disturbance that would occur would be mitigated with silt fencing. In addition, when the staining of wood would occur on site and at least 1-4 hours before a projected rainfall to avoid run off. The excess stain would be disposed of properly and the Hazardous waste spill plan would be followed in the event of an accident.

**Wildlife and wildlife habitat** - The approximately 15,000 acres of parkland at Prince William Forest Park make it an excellent habitat for many species of birds and mammals. The presence of forest, meadow, stream, and wetland habitat provides homes to 13 different species of frogs, toads, numerous bird and butterfly species, and healthy breeding populations of mammals (NPS, 1999; NPS, 2002b). The most common mammal species within the project area are the gray squirrel, mice, and white-tailed deer. However, because Cabin Camp 4 is a high visitation area, the concentration of wildlife in the area is very low. This project would bring very minimal and temporary disturbance to wildlife and the wildlife habitat. As there would be negligible impact, wildlife and wildlife habitat was dismissed as an impact topic.

**Threatened, Endangered or Special Concern Species** - The only federally threatened or endangered species known to occur within PRWI is the small whorled pogonia (*Isotria medeoloides*), a federally endangered orchid. Habitat for this species in Virginia consists of deciduous mid successional forests with fairly sparse ground cover. Intensive grazing by the white tailed deer is reported as the biggest threat to long term survival within the Park. Known colonies of this species are all outside the project area (Van Alstine and A. Belden Jr., 2007). NPS sent notification of the proposed project to the Virginia Department of Natural Heritage and to the U.S. Fish and Wildlife Service (USFWS) on June 17, 2009. The Virginia Department of Natural Heritage reviewed the project and concurred that the affected area was too distant to

known *Isotria medeoloides* colonies to anticipate adverse impacts. The USFWS further concurred with a letter dated August 21, 2009, determining no colonies of the plant occurred within the project area and that the project would have no adverse effect on federal endangered and threatened species. An important component of the preservation of this species under the Endangered Species Act is the designation of critical habitat for threatened and endangered species. Critical habitat areas are designated geographic locations occupied by a threatened or endangered species which contain those physical or biological features essential to the conservation of the species. It may also include areas outside the geographical area occupied by the species when it has been determined that such areas are essential for the conservation of the species. PRWI has not been designated as critical habitat for any species on the federal endangered species list. Based on the lack of critical habitat present within the Park, the absence of small whorled pogonia colonies in the vicinity of the project area, and the concurrence of the VDNH and USFWS, no impact would occur.

**Floodplains** - In compliance with Executive Order 11988, it is NPS policy to preserve floodplain values and minimize potentially hazardous conditions associated with flooding (NPS, 2002a). The proposed alternative does not lie within a 50-100 year floodplain. Topographically, the project area lies on a ridge and is not in the immediate vicinity of the Quantico Creek. Since the project area does not lie within a floodplain this topic has been dismissed from further evaluation.

**Wetlands** - In accordance with NPS Director's Order 77-1 which implements Executive Order 11990, NPS is required to avoid impacting wetlands whenever there is a practical alternative. The NPS utilizes the Fish and Wildlife Service, U.S. Department of the Interior publication, *Classification of Wetlands and Deepwater Habitats of the United States*, 1979, to classify wetlands. For identification purposes, wetlands must have one or more of the following three attributes: (1) at least periodically, the land supports predominately hydrophytes; (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is nonsoil and is saturated with water or covered by shallow water at some time during the growing season of each year.

The project would occur in the Camp Pleasant Historic District, which includes a lake. However, this lake does not lie within the project area. No impacts would occur to wetlands under the No Action alternative.

As the boundaries of the wetland are located outside of the existing footprint of the project area, no dredging or fill would occur within the wetland. Because this project would not affect any wetlands, this impact topic has been dismissed.

**Air Quality** - The Clean Air Act (42 USC 85) is the law that defines EPA's responsibilities for protecting and improving the nation's air quality and the stratospheric ozone layer. The last major change in the law, the Clean Air Act Amendments of 1990, was enacted by Congress in 1990. In general, this act requires federal agencies to protect Park air quality and air quality related values (including visibility, plants, animals, soils, water quality, cultural and historic resources and objects, and visitor health) from adverse air pollution impacts. Prince William Forest Park is a designated Class II area and Prince William County has been designated as a non attainment area for ozone, and a state volatile organic compounds and nitrogen oxides emission area (9VAC5-20-205 and 206).

No effects to air quality would occur under the No Action alternative due to the use of small hand tool and electric tools for construction work. Based on the lack of effects on air quality from implementation of the action alternative, air quality was dismissed as an impact topic in this EA.

**Traffic and Transportation** - The annual average daily traffic on the Park roadways for 2007 was 160 vehicles per day, or 58,400 per year (EFLHD, 2007a). Under the No Action alternative, traffic and transportation would continue as normal. During the construction of the preferred alternative, access to Cabin Camp 4 would be limited during construction periods. However, Cabin Camp 1 will remain accessible by both Route 234 and Burma Road. No roads will be closed during construction. This impact topic was dismissed from further analysis in this EA because the impacts on traffic and transportation under either alternative would be short term and negligible.

**Unique Ecosystems, Biosphere Reserves, World Heritage Sites** -There are no known biosphere reserves, World Heritage sites, or unique ecosystems associated with Prince William Forest Park at large or specifically at the project site; therefore, this impact topic was dismissed from further analysis in this EA.

## **CULTURAL RESOURCES**

The National Historic Preservation Act (NHPA; 16 USC 470 et seq.), NEPA, NPS 1916 Organic Act, the NPS 2006 Management Policies (NPS 2006), DO-12 (Conservation Planning, Environmental Impact Analysis and Decision-making), and NPS-28 (Cultural Resources Management Guideline) require the consideration of impacts on any cultural resources that might be affected, and NHPA, in particular, on cultural resources either listed in, or eligible to be listed in, the National Register of Historic Places (NRHP). Cultural resources include archeological resources; cultural landscapes; historic structures and districts; ethnographic resources; and museum objects, collections, and archives.

**Archaeological Resources** - The 1966 National Historic Preservation Act, as amended, National Environmental Protection Act (NEPA), the 1916 NPS Organic Act, NPS Management Policies 2006 and other NPS guidelines require consideration of cultural resource impacts. The action alternative would result in minimal ground disturbance; however this would occur in ground that has been heavily disturbed. Cabin Camp 4 has been previously disturbed with its initial creation, years of usage by cabin campers, and through various maintenance projects. Additionally, the Louis Berger Group conducted an extensive four year archaeological project in Prince William Forest Park from 1999-2003. Although areas around Cabin Camp 4 were surveyed, the Berger group decided not to survey Cabin Camp 4 because of the low potential of discovering prehistoric or historic remains. Therefore, no impacts to archeological resources would occur under the No Action alternative.

If during rehabilitation of camp structures significant archeological resources are discovered, all work in the immediate vicinity of the discovery would be halted until the resources could be identified and documented and an appropriate mitigation strategy developed, if necessary, in consultation with the Virginia State Historic Preservation Officer. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 would be followed. Because no impacts to National Register eligible archeological resources are anticipated, and any inadvertent discoveries would be addressed in accordance with the MOA, archeological resources was dismissed as an impact topic.

**Cultural Landscapes** - As described by the National Park Service (1998) *Cultural Resource Management Guidelines* (Director's Order #28), a cultural landscape is defined as, "a reflection of human adaptation and use of natural resources and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built. The character of cultural landscapes is defined both by physical materials, such as roads, buildings, walls, and vegetation, and by use reflecting cultural values and traditions."

Two cultural landscapes, Hickory Ridge and Joplin, have been identified in Prince William Forest Park and are listed on the Cultural Landscapes Inventory. These cultural landscapes were small rural farming communities that existed in the 1930s in what is now Prince William Forest Park. Neither of these areas falls into the Area of Potential Affect for the Rehabilitate Cabin Camp 4 project; therefore cultural landscapes was eliminated as an impact topic.

**Ethnographic Resources** - Ethnographic resources are the cultural and natural features of a Park that are of traditional significance to traditionally associated peoples. These peoples have been associated with a Park for two or more generations, and whose interests in the Park's resources began before the Park was established (NPS, 2006). NPS Regional Support staff and PRWI cultural resource staff have reviewed the proposed project and have determined that no ethnographic resources are present within the project area. Since no known ethnographic resources would be affected by the proposed actions and because mitigations

would be in place to protect any human remains, funerary objects, sacred objects, or objects of cultural patrimony inadvertently discovered, ethnographic resources was dismissed as an impact topic.

**Museum Collections** - Implementation of any alternative would have no effects upon museum collections (historic artifacts, natural specimens, and archival and manuscript material); therefore, museum collections was dismissed as an impact topic.

**Socioeconomic Resources** -While the action alternative would be expected to have a beneficial impact on employment and on the local tax base, these impacts would not likely be noticeable, and would only occur during the construction phase of the project. The No Action alternative would be expected to have no socioeconomic impacts. Since no adverse socioeconomic impacts are expected, this impact topic was dismissed.

**Environmental Justice** - Presidential Executive Order 12898, General Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. According to the Environmental Protection Agency, environmental justice is the:

*“...fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.”*

The goal of ‘fair treatment’ is not to shift risks among populations, but to identify potentially disproportionately high and adverse effects and identify alternatives that may mitigate these impacts. Both minority and low-income populations are present in the vicinity of Prince William Forest Park; however, environmental justice is dismissed as an impact topic for the following reasons:

- The Park staff and planning team actively solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- Implementation of the proposed alternatives would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse effects on any minority or low-income population.
- The impacts associated with implementation of the proposed alternatives would not disproportionately affect any minority or low-income population or community.
- Implementation of the proposed alternatives would not result in any identified effects that would be specific to any minority or low-income community.
- Any impacts to the socioeconomic environment would not appreciably alter the physical and social structure of the nearby communities of Prince William County.



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## ALTERNATIVES

NEPA requires federal agencies to explore a range of reasonable alternatives aimed at addressing the purpose and needs of the issue. The alternatives under consideration must include the “no action” alternative as prescribed by 40 CFR 1502.14. Project alternatives may originate from the proponent agency, local government officials, or members of the public, at public meetings or during the early stages of project development. Alternatives may also be developed in response to comments from coordinating or cooperating agencies. The alternatives analyzed in this document, in accordance with NEPA, are the result of design scoping, internal scoping, and public scoping. These alternatives meet the management objectives of the park while also meeting the overall purpose of and need for proposed action. Alternatives that were considered but were not technically or economically feasible, did not meet the purpose and need of the project, created unnecessary or excessive adverse impacts to cultural or natural resources, and/or conflicted with the overall management of the park or its resources were dismissed from further analysis. The NPS explored and objectively evaluated two alternatives in this EA, including:

Alternative A – No action.

Alternative B – Rehabilitate 14 Historic Structures in Cabin Camp 4 (NPS Preferred)

### **ALTERNATIVE A – NO ACTION**

Under the No Action alternative, Prince William Forest Park would continue to operate and manage Cabin Camp 4 under the current conditions. It does not imply or direct discontinuing day-to-day maintenance and repairs or stopping previously approved plans on any of 38 structures or features included in Cabin Camp 4. The maintenance activities to rehabilitate the roofing, exterior, and interior of historic buildings or make upgrades would occur on an as needed basis when funding was available.

### **ALTERNATIVE B (NPS PREFERRED ALTERNATIVE) – REHABILITATE 14 HISTORIC STRUCTURES IN CABIN CAMP 4**

#### **General Maintenance**

The actions proposed under Alternative B associated with the general maintenance of Cabin Camp 4 would include replacing the roof systems, substructure, and components of buildings Cabin E-3, Bath House E-10, Craft Lodge E-12, Cabin Camp C-1, Cabin Camp C-2, Cabin Camp C-3, Bath House C-10, Craft Lodge C-12, Storage Building # 40, Craft Lodge Building # 78, Administration Building # 50, Staff Quarters Building #65, and Building # 90. The work to be completed would maintain the historic integrity of the buildings and materials would be replaced in kind. Further discussion of the proposed actions is provided below.

The roof systems for all thirteen buildings would be replaced. The non-historic three tab green roof shingles would be stripped and recycled. 122 squares of park approved asphalt shingles would be installed and any damaged roof sheathing would be replaced in kind with lumber. In addition, copper flashing, drip edge, and valley flashing would be installed as needed.

Damaged substructures would also be repaired or replaced as needed. This work would include replacing deteriorated column bases, and rotted porch railing. Piers would be installed at buildings where they are presently missing or resettled to their original position. Pier footers would be hand dug and filled with concrete. A digging bar would be used to move steps that would be replaced. Grade work would also be completed to return grade to original level in order to repair the sill beams behind the concrete steps. New piers would be attached to the flooring system of the building. All materials would be replaced in kind.

Many windows are cracked and/or have worn screens or sills. Window glazing panels that are broken or missing would be replaced and reglazed. Decayed window sills would be replaced in kind and window screens would be installed. Brick work would be completed on an outdoor grill at Craft Lodge E-12 and restored to its original design. The brick would be repaired or replaced with a park approved mixture for mortar.

Plumbing and electrical systems throughout the cabins would also be updated. Currently, the FPE panels that were installed in the 1970s are still in use. These would be replaced with small breakers that meet federal regulation. In addition, new smoke detectors would be upgraded to 120 volt with battery backup. Energy efficient light bulbs would also be installed as necessary.

### **Cabin Upgrade**

In addition to the general maintenance that would occur, the Staff Quarters Building #85 would also be updated. The roof system would be replaced, as well as the exterior siding, sill beams, windows and doors would be repaired and replaced when necessary. All non-painted exterior wooden surfaces would be stained using a park and SHPO approved stain. All of these materials would be replaced in kind. The porch would be repaired using pine boards in order to replace in kind. A ramp would be installed to make the cabin wheel chair accessible in compliance with American Disability Act (ADA).

The plumbing and electrical systems would also be upgraded to meet current electrical standards. Old bathroom fixtures would be removed and supply and waste lines would be replaced. A 12 inch deep and 24 inch wide trench would be dug to replace 40 ft. of waste line. The current waste line is made from galvanized pipe and is rusted with holes. The pipe would be replaced using PBC drain lines using the same route. The water supply line would also be replaced. The original water supply line was installed in 1975 and 160ft of line would be replaced with copper pipe (NPS, 2009a). The water closet would be also replaced with a water saver toilet. A new bathroom sink and shower would also be installed. These features would be installed to replace the older and less efficient systems currently in place.

Additionally, a basic kitchenette would be installed including a sink, refrigerator, gas stove and kitchen cabinets. These additions would be made reversible by placing these features in the building with minimal installation. The cabinets would rest on the floor and attach to the framing with small screws. The countertops would be attached to the cabinets rather than the wall. A two-inch hole would be drilled in the floor for a sink drain to connect with the pre-existing plumbing pipes beneath the building. A half inch black iron pipe would be installed to run from the gas stove to pre-existing natural gas lines located outside of the structure in Camp 4. The existing ¼ inch flex copper pipe is outdated and would be replaced with 30 ft of line. No digging would be required and this work would be performed by a contractor that meets NPS standards. By extracting the sink, refrigerator, gas stove, and kitchen cabinets, and patching the sink drain hole and screw holes, the kitchenette could be removed while leaving minimal traces. A fire extinguisher would be installed in the kitchen in order to provide further fire suppression support. Smoke detectors were previously installed in this building in 2001. In addition, the electrical outlets and switches would be replaced, as well as installing a 100 amp breaker panel. The existing electrical panel is outdated and a standard 100 amp panel would replace this to meet safety codes. Four, 52-inch antique brass ceiling fans would also be added in effort to provide ventilation for seasonal guests. The ceiling fans would replace the existing light fixtures that are in place and would not require altering the structure.

### **MITIGATION MEASURES OF THE ACTION ALTERNATIVE**

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the NPS would ensure that the following protective measures are implemented as part of either of the action alternatives. The NPS would implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly executed and are achieving their intended results. Additionally, although the EA addresses the entire project, the park would be required to review the document at the commencement of each phase to ensure that all project information is up to date and in compliance with the necessary regulations.

#### **General mitigations**

- The NPS project manager would ensure that the project remains confined within the parameters established in the compliance documents and that the mitigation measures are properly implemented.

- Cabin Camp 4 would be closed during the entirety of the project to ensure visitor safety.
- Appropriate signage would be placed to direct visitors away from staging or construction areas.
- Construction zones outside the existing disturbed area would be identified and roped off.
- All tools, equipment, signs, and surplus materials would be kept in a storage trailer while the project is being completed.
- All equipment on the project would be maintained in a clean and well functioning state.
- Silt fencing would be placed where ground disturbance would occur.
- Stain would be added at least 1-4 hours before a projected rainfall to avoid run-off.
- Excess stain would be disposed of properly.
- A hazardous spill plan would be in place, stating what actions would be taken in the case of a spill.

### **Cultural Resource Mitigations**

- If previously unknown archaeological resources are discovered during project construction, the regional archaeologist would be contacted immediately. All work in the immediate vicinity of the discovery would be halted until the resources could be identified and documented and an appropriate mitigation strategy developed, if necessary. The significance of these finds would be assessed and the results shared with the State Historic Preservation Office (SHPO). If appropriate, a Memorandum of Agreement would be developed between SHPO and NPS
- The staging area, storage pod, and temporary office trailer would be configured to avoid impacts to historic structures.
- Visual impacts to Cabin Camp 4 would be eliminated by closing the area to public use.

### **Visitor use and experience**

- Visitors would be able to schedule tours to view cabin camp buildings with appropriate park staff during the period when Cabin Camp 4 would be closed.

### **ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD**

Council of Environmental Quality (CEQ) regulations for implementing NEPA require federal agencies explore and objectively evaluate all reasonable alternatives to the preferred alternative, and to briefly discuss the rationale for eliminating any alternatives that were not considered in detail. This section describes those alternatives that were eliminated from further study and documents the rationale for their elimination.

During the course of internal scoping, several alternatives were considered but deemed to be unreasonable and were not carried forward for analysis in this EA. Justification for eliminating these options from further analysis was based on the following factors:

- Technical or economic feasibility.
- Inability to meet project objectives or resolve need.
- Duplication with other, less environmentally damaging or less expensive alternatives.
- Conflict with an up-to-date and valid park plan, statement of purpose and significance, or other policy, such that a major change in the plan or policy would be needed to implement.
- Too great an environmental impact.

The following alternatives were considered but dismissed for the listed reasons.

**Installing Electric Stove in Kitchenette** - The Cabin Upgrade of Building #85 proposes the installation of a kitchenette equipped with cabinets, a refrigerator, and some heating element. Originally, it was proposed to install an electric stove. However, because of the increased risk of fire an electric stove would bring, this alternative was eliminated. Instead, a gas stove would be installed in the kitchenette to decrease the risk of fire.

**Return to Cedar Shake** - Park Management Staff and Regional Cultural Resource Advisors discussed the alternative of returning to the use of cedar shake shingles for the roof replacement. Originally, the Civilian Conservation Corps installed cedar shake shingles on the cabins, but the park began using asphalt shingles in 1942 (NPS, 1988). Returning to the use of cedar shake shingles would require continual maintenance and upkeep because of its propensity to attract fungus and shift or leak from water damage. Cedar shake shingles would require being treated with a water sealant every three years. Other chemicals would have to be added to reduce the fire hazards that inherently come with wood roofing. While this option would return some of the historic authenticity of the buildings, it was ultimately decided that the park would be unable to maintain the cedar shake shingles because of the economic infeasibility and staff concerns for up keeping the cedar shake.

**Return to original park stain** - The park management staff and regional cultural resource advisors also discussed the stain used for the cabin camp buildings. It is believed that a lighter creosote mixture was originally used by the Civilian Conservation Corps to stain the cabins. Conservation research would be required to determine the original mixture of creosote used, as well as archival research for photo documentation of the lighter stain. Conducting the needed research for the original mixture would fall outside the scope of this project as rehabilitation work. In addition, adding this component would also greatly extend the timeline for completing this project. Instead the park would use a mixture that has been supported by the State Historic Preservation Office (SHPO).

### **THE ENVIRONMENTALLY PREFERRED ALTERNATIVE**

The environmentally preferred alternative is defined by CEQ as the alternative that would promote the national environmental policy as expressed in NEPA Section 101. This includes:

1. Fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assuring for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserving important historic, cultural and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieving a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities; and
6. Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources (NEPA, Section 101).

The NPS is required to identify the environmentally preferred alternative in its NEPA documents for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and the Council on Environmental Quality's (CEQ) *NEPA's Forty Most Asked Questions*, defines the environmentally preferred alternative (or alternatives) as the alternative that best promotes the national environmental policy expressed in NEPA (Section 101(b) (516 DM 4.10). In their *Forty Most Asked Questions*, CEQ further clarifies the identification of the environmentally preferred alternative, stating "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).



After completing the environmental analysis, the NPS identified Alternative B as the environmentally preferred alternative in this EA because it best meets the definition established by the CEQ. Alternative B provides for the rehabilitation of historic structures with park approved methods that would not compromise the historic integrity of any buildings or their elements. It also allows for continued visitor use and enjoyment of the cabin camp buildings by improving the condition of the cabin camp buildings. This would not only make the cabin camps more aesthetically pleasing, but would allow for long-term continued use of the structures. Alternative B also increases visitor safety by installing updated electrical and plumbing systems. The cabin upgrades that would occur in Building # 85 would also be reversible in order to avoid permanently altering the building and meet the park's need of creating additional season housing. All rehabilitation work would use park and NPS approved methods and replace materials in kind.

A summary of the environmental consequences follows in Table 1.

**Table 1 - Summary of Impacts**

<b>Impact Topic</b>	<b>Alternative A – No Action</b>	<b>Alternative B (NPS Preferred) – Rehabilitate 14 Structures in Camp Pleasant</b>
<b>Historic Structures/Districts</b>	The No Action alternative would result in long term minor adverse impacts because the historic integrity is threatened by the existing poor condition. There would also be long-term negligible adverse cumulative impacts associated with this alternative. There would be no impairment of park resources or values under the No Action Alternative. For purposes of Section 106, the determination of effect would be no adverse effect.	The actions associated with Alternative B would result in long term minor adverse and long-term beneficial impacts. There would also be long-term beneficial cumulative impacts as a result of Alternative B. There would be no impairment of park resources or values under this alternative. For purposes of Section 106, the determination of effect would be no adverse effect.
<b>Visitor Use &amp; Experience</b>	The No Action alternative would result in long-term minor impacts because visitor satisfaction would decline. The No Action alternative would result in long-term negligible adverse cumulative impacts.	Under Alternative B short term and minor adverse impacts would occur due to the closure of Cabin Camp 4 during construction activities. After completion, visitors would regain access to improved cabin camp buildings. These impacts would be long term and beneficial. There would also be long-term beneficial cumulative impacts.
<b>Park Operations &amp; Management</b>	The No Action alternative would result in long term minor adverse impacts to park operations and management. The No Action alternative would also result in long-term minor adverse cumulative impacts.	Alternative B (NPS Preferred) would result in the temporary closure of the cabin camp buildings. This would result in short-term minor adverse impacts. After construction the cabin camps would be available for rental again and park operations would resume. This impact would be beneficial for park operations and management. In addition, cumulative impacts would be long-term and minor.

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## AFFECTED ENVIRONMENT/ENVIRONMENTAL CONSEQUENCES

This chapter summarizes the existing environmental conditions and the probable environmental consequences (effects) of implementing the action and no action alternatives. This chapter also provides the scientific and analytical basis for comparing the alternatives. The probable environmental effects are quantified where possible. In the absence of quantitative data, best professional judgment was used and qualitative descriptions are provided.

### GENERAL METHODOLOGY FOR ESTABLISHING IMPACT THRESHOLDS AND MEASURING EFFECTS

Potential impacts of all alternatives to each specific affected resource are described in terms of type (beneficial or adverse); context; duration (short- or long-term); and intensity (negligible, minor, moderate, major). Definitions of these descriptors include:

*Beneficial:* A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.

*Adverse:* A change that declines, degrades, and/or moves the resource away from a desired condition or detracts from its appearance or condition.

*Context:* Context is the affected environment within which an impact would occur, such as local, park-wide, regional, global, affected interests, society as whole, or any combination of these. Context is variable and depends on the circumstances involved with each impact topic. As such, the impact analysis determines the context, not vice versa.

*Duration:* The duration of the impact is described as short-term or long-term. Duration is variable with each impact topic; therefore, definitions related to each impact topic are provided in the specific impact analysis narrative.

*Intensity:* Because definitions of impact intensity (negligible, minor, moderate, and major) vary by impact topic, intensity definitions are provided separately for each impact topic analyzed.

Table 2 depicts the impact threshold definitions used in this EA. Significant impact thresholds for the various key resources were determined in light of compliance with existing state and federal laws, and compliance with existing park planning documents.

**Table 2 - Impact Threshold Definitions**

Impact Topic	Negligible	Minor	Moderate	Major	Duration
<b>Historic Structures and Districts</b>	The impact is at the lowest level of detection with neither adverse nor beneficial consequences. For purposes of Section 106, the determination of effect would be no adverse effect.	Alteration of a pattern(s) or feature(s) of a historic district or structure listed on or eligible for the National Register of Historic Places that would not diminish the integrity of a character-defining feature(s) or the overall integrity of the historic property. For purposes of Section 106, the determination of effect would be no adverse effect.	The impact would alter a character-defining feature(s) of a historic district or structure and diminish the integrity of that feature(s) of the historic property. For purposes of Section 106, the determination of effect would be adverse effect.	The impact would alter a character-defining feature(s) of the historic district or structure and severely diminish the integrity of that feature(s) and the overall integrity of the historic property. For purposes of Section 106, the determination of effect would be adverse effect.	All impacts are assumed to be long-term.

<b>Visitor Use and Experience</b>	Visitors would likely be unaware of any effects associated with implementation of the alternative. There would be no noticeable change in visitor use and experience or in any defined indicators of visitor satisfaction or behavior.	Changes in visitor use and/or experience would be slight and detectable but would not appreciably limit critical characteristics of the visitor experience. Visitor satisfaction would remain stable.	A few critical characteristics of the desired visitor experience would change and/or the number of participants engaging in a specified activity would be altered. Some visitors who desire their continued use and enjoyment of the activity/visitor experience might pursue their choices in other available local or regional areas. Visitor satisfaction would begin to decline.	Multiple critical characteristics of the desired visitor experience would change and/or the number of participants engaging in an activity would be greatly reduced or increased. Visitors who desire their continued use and enjoyment of the activity/visitor experience would be required to pursue their choices in other available local or regional areas. Visitor satisfaction would markedly decline.	Short-term impacts would last less than one year. Long-term impacts would last more than one year.
<b>Park Operations and Management</b>	Park operations would not be impacted, or the impacts would be at low levels of detection and would not have an appreciable effect on NPS operations.	The impacts would be detectable and would be of a magnitude that would not have an appreciable effect on NPS operations. If mitigation was needed to offset adverse effects, it would be simple and likely successful.	The impacts would be readily apparent and result in a substantial change in operations in a manner noticeable to staff and the public. Mitigation measures would be necessary to offset adverse effects and would likely be successful.	The effects would be readily apparent, result in a substantial change in NPS operations in a manner noticeable to staff and the public, and be markedly different from existing operations. Mitigation measures to offset adverse effects would be needed and extensive, and success could not be guaranteed.	Short-term impacts would occur sporadically throughout the course of a year. Long-term impacts would last more than one year.

## CUMULATIVE IMPACTS

NEPA regulations require an assessment of cumulative impacts in the decision-making process for federal projects. Cumulative impacts are defined as “the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions” (40 CFR 1508.7). Cumulative effects can result from individually minor, but collectively moderate or major actions that take place over a period of time.

Cumulative impacts are considered for all alternatives, including the No Action alternative. Cumulative impacts were determined by combining the impacts of the alternative being considered with other past, present, and reasonably foreseeable future actions. The following actions were identified as having the potential for impacts to the resources that are evaluated in this environmental assessment.

**Rehabilitate 17 Buildings in Cabin Camp 4 – In 2007**, rehabilitation work was completed on 17 structures in Cabin Camp 4. Rotted shingles and sheathing were replaced with asphalt shingles that closely resemble wooden shingles. Rotted siding was also replaced and structural beams were repaired. The buildings were stained with a park approved stain. The rehabilitated buildings in Cabin Camp 4 included the following: Cabin A-1, Cabin A-2, Cabin A-3, Cabin B-1, Cabin B-2, Cabin B-3, Cabin D-1, Cabin D-2, Cabin D-3, Cabin E-1, Cabin E-2, Bath House A-10, Bath House B-10, Bath House D-10, Craft Lodge A-12, Craft Lodge B-12, Craft Lodge D-12.

**Remove rock from Cabin Camp 4 spillway project** – A portion of rock that protrudes above the channel of water would be removed from the Cabin Camp 4 dam to deter further erosion and mitigate damage to the historic spillway wall. The dam is located in Cabin Camp 4 and the removal of rock is proposed to be completed in August of 2009.

**Long range interpretive plan** - The PRWI General Management Plan identified the need to expand the interpretive program to emphasize the Park's mission. This plan calls for an improved visitor center with new enhanced exhibits and interpretive waysides at major trailheads and the historic cabin camps.

**New Access Entrance on VA 234**– The NPS is proposing to construct a new vehicular access entrance on VA 234 (Dumfries Road) along with an adjacent bike and pedestrian path. An Environmental Assessment was completed in May 2006.

**Resurface Public Roads and Rehabilitate Parking Areas** – The NPS is proposing to reconstruct or repave Turkey Run Ridge Road, Oakridge Campground Road, and portions of Scenic Drive. In addition, 13 parking lots would be repaved and/or extended.

**Planned Residential Communities on Dumfries Road** – According to the Prince William

County 2008 Comprehensive Plan, several residential communities are planned for the area north of Dumfries Road, which borders the Park on its northeast side (PWC 2008a).

**Route 1 Expansion** – This project proposes to widen sections of Route 1 from Joplin Road to Bradys Hill Road to a six-lane divided facility in effort relieve congestion and improve safety. A 16-foot wide median, curb and gutter, on-road bike lane, and off-road pedestrian. Businesses located alongside Route 1 have been closed for this project and actual construction would begin in FY 2009 (PWC 2008b).

## **IMPAIRMENT ANALYSIS**

The NPS 2006 Management Policies require an analysis of potential effects to determine whether or not actions would impact park resources, but also to determine whether those actions would impair park resources. The fundamental purpose of the national park system as established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. These laws give the NPS the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values. NPS managers must always seek ways to avoid or minimize to the greatest degree practicable, adversely impacting park resources and values. The impairment that is prohibited by the Organic Act and the General Authorities Act is an impact, in the professional judgment of the responsible NPS manager, that would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact to any park resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it has a major or severe adverse effect upon a resource or value whose conservation is:

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

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. An impairment determination is included in the conclusion statement for all impact topics related to all Prince William Forest Park's natural resources (soils, surface waters, vegetation, cultural landscapes, and historic structures). Impairment determinations are not made for visitor use and enjoyment, health and safety, socioeconomics, or park operations and management, because impairment findings relate back to park resources and values and these impact areas are not generally considered to be park resources or values. Impairment determinations are not made for visitor use and experience because, according to the Organic Act, enjoyment cannot be impaired in the same way an action can impair park resources and values.



## IMPACT TOPIC

### HISTORIC STRUCTURES/DISTRICTS

Prince William Forest Park has four Cabin Camps (1-4) built by the Civilian Conservation Corps that are listed on the National Register. These cabin camps are each listed as a separate historic district with contributing structures. The park manages these historic districts and structures as significant cultural resources and aims to preserve their historic integrity. Prince William Forest Park's General Management Plan (1999) calls for these cabin camps to be "rehabilitated to ensure the long-term preservation of these historic resources...in compliance with law, policy, and *The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*" (NPS, 1999). In addition, any alternations that would permanently compromise the historic fabric of the buildings would not be permitted. The 1995 Resource Management Plan set forth an objective of insuring that cultural resources in the park would be properly managed and preserved in accordance with NPS management policies and legislation (NPS, 1995).

Cabin Camp 4 encompasses approximately 132 acres, and contains 15 cabins, five lodges, five latrines, an office/administration building, dining hall, infirmary, craft lodge/nursery, two help/staff quarters, a central washhouse, recreational building/theatre, two storage buildings, two dams, and a footbridge. There is a central area, which includes the dining hall, and miscellaneous buildings for medical care, staff quarters, and recreation. A short distance from this central area are 5 units (Units A-E) which all contain a restroom, craft lodge, and three cabins housing up to 10 people. The district includes 36 contributing buildings and three contributing structures. Camp Pleasant is located in the northeast corner of the Park, north of North Quantico Creek and below Camp Goodwill Historic District (Cabin Camp 1).

Currently, all 14 cabin camp structures in the proposed project are in poor condition with need for structural rehabilitation. Natural deterioration from age and weather have contributed to failing roof systems, substructure, and other elements. The 1995 Resource Management Plan noted that the majority of the cabin camp facilities were in good condition. However, the most recent List of Classified Structures (LCS) survey lists the buildings in poor condition (NPS, 2009b). The roof systems on these buildings are over 20 years old and extensive moss growth has covered the shingles. Many other elements have also sustained continued impact from weather conditions and pest infestation. The exterior siding, sill beams, windows, doors, and porches have visible water damage. A splash effect appears on the lower portion of many buildings.

Building E-12 (craft lodge) sustained serious damage from a recent fire. While the building was saved, the rafters and ridge beams in the interior of the building received visible damage. These elements are charred from the fire and remain weak in many areas.

Many buildings also have outdated plumbing and electrical systems. FPE panels were placed in the buildings during the 1970s, but now no longer meet code. Additionally, Building #85 (staff quarters) currently contains a toilet and shower for visitor use. However, the plumbing system that exists is outdated.

### Alternative A – No Action Impact Analysis

Under the No Action alternative Prince William Forest Park would continue to operate and manage the park under the current conditions. Continued visitor use, weather damage, and natural deterioration of the buildings would occur. The historic structures would continue to be maintained to the Secretary of Interior standards, on an as-needed, structure by structure basis, and as funding and staff availability allows. Under this alternative, because not all the maintenance requirements would be completed at the same time, and some structures would remain under maintained until funding allows, the overall condition of these structures would vary; resulting in long term minor adverse impacts. For purposes of Section 106, the determination of effect would be no adverse effect.

### Cumulative Effects

Two projects have the potential to bring beneficial impacts to the Camp Pleasant Historic District (Cabin Camp 4). The Remove Rock from Cabin Camp 4 spillway project would include the removal of a protruding rock to prevent extensive erosion from occurring at the Camp 4 dam and improve the aesthetics of the area. Currently, the rock exists along the historic spillway wall that is listed on the List of Classified Structures as a contributing feature to Camp Pleasant Historic District (Cabin Camp 4). Additionally, it would allow for the dam to remain open for visitor enjoyment. The Long-Range interpretive plan would also have a beneficial impact on the historic district by providing additional interpretation and displays. The Rehabilitate 17 Buildings in Camp 4 project, expansion of Route 1, the development of residential areas off Route 234, new entrance on VA 234, and Repave Roads and Parking Areas project would not impact historic structures/district in Alternative A. These impacts, when combined with the long-term minor adverse impacts associated with the No Action alternative would result in long-term negligible adverse impacts to the Camp Pleasant Historic District.

### **Alternative B (NPS Preferred) – Rehabilitate Cabin Camp 4 Impact Analysis**

Under Alternative B, 13 historic structures would be rehabilitated and Building #85 would be rehabilitated and upgraded to include a kitchenette in order to allow the building to be used for seasonal housing. This rehabilitation work would meet the park goals identified in the General Management Plan and Park Mission Statement of preserving the historic districts and structures. Rehabilitation work would be completed on the roof systems, and damaged substructures would also be repaired or replaced as needed. Other cosmetic and exterior repairs, such as repairing windows, chimneys, or applying stain to exterior siding, would be made as necessary and in accordance with the Secretary of Interiors Standards for the Treatment of Historic Properties. Park approved shingles and stain would be used. Updating the electrical and plumbing systems would also occur in many buildings. The proposed project would have long-term, minor adverse effects because portions of the historic fabric that are unstable or missing would be removed and replaced in accordance with the Secretary of Interiors Standards for the Treatment of Historic Properties, and a kitchenette would be installed in Building #85. The kitchenette would be designed so that little of the historic structure would be modified. This would be done in the event that the park decides sometime in the future to restore Building #85 back to its original condition, the restoration would be relatively simple, with little impact to the historic layout of the structure.

There would also be beneficial impacts because the deteriorated and unstable structural elements would be removed and replaced with in-kind materials, thus prolonging the life and function of the buildings in accordance with the Park's enabling legislation and park policies.

### **Cumulative Effects**

The Rehabilitate 17 Buildings in Camp 4 project improved the overall conditions of Camp Pleasant District historic structures. In addition, the Remove Rock from Cabin Camp 4 spillway project would also have a beneficial impact on the Camp Pleasant Historic District. The rock exists along the historic spillway wall that is listed on the List of Classified Structures as a contributing feature to Camp Pleasant Historic District. The project would remove a protruding rock to prevent extensive erosion from occurring at the Camp 4 dam and improve the aesthetics of the area. Additionally, it would allow for the dam to remain open for visitor enjoyment. The Long-Range interpretive plan would also have a beneficial impacts, as it would provide increased interpretation and displays at the Camp Pleasant Historic District. The expansion of Route 1, the development of residential areas off Route 234, new entrance on VA 234, and Repave Roads and Parking Areas project would not impact historic structures. These impacts, when combined with the long-term minor adverse and long-term beneficial impacts of Alternative B would result in long-term beneficial cumulative impacts to the historic structures and Camp Pleasant Historic District.

### **Conclusion**

The No Action alternative would result in long term minor adverse impacts and long-term negligible adverse cumulative impacts. Alternative B (NPS Preferred) would result in long term, minor adverse and long-term beneficial impacts to the historic structures and district. There would be long-term beneficial

cumulative impacts under Alternative B. There would be no impairment of park resources or values under either the No Action Alternative or Alternative B.

### **VISITOR USE AND EXPERIENCE**

Within an hour's drive for more than 4 million people, the Prince William Forest Park provides a rare undeveloped landscape of mixed hardwood forest and many opportunities to experience the outdoors. Recreational activities such as camping, hiking, picnicking, and biking have become increasingly popular in the Park. There are 37 miles of hiking trails, three wooden bridges, five actively used cabin camps, the Cabin Branch Pyrite Mine, Civil War-era plantation sites, and more than 25 miles of streams within the Park. The Park contains a tributary to the Chesapeake Bay, Quantico Creek, which is a high quality aquatic resource that is used for scientific research as a reference stream. Four of the CCC cabin camps are listed on the National Register of Historic Places as historic districts.

Park records indicate that PRWI receives over 200,000 visitors annually (NPS, 2008b). Historically, the number of visitors to the Park is highest in the summer months and lowest in mid winter. In a recent visitor survey, the most important reason for visiting Prince William Forest Park include being close to nature, getting away from the usual demands of life, enjoying the sounds of nature, and getting exercise (Lawson, et. al., 2006). The survey indicated that visitors rank the maintenance of Park facilities, roads and trails (Lawson, et. al., 2006) as an important component of their Park experience.

Cabin Camp 4 is located off of Route 234, approximately 3 miles from the interstate. The camp includes amenities to accommodate various uses for groups. A central dining hall with a commercial size oven, refrigerator, and large dining space are available for use. Restrooms are located in each unit of Cabin Camp 4 and each cabin also provides single cots and mattresses. Camp 4 is open from May-October and is available for day or overnight rental with a capacity of hosting 200 people. Over 24,000 individuals use Cabin Camp 4 each season. The primary usage comes from various groups who come for camping during the weekends, however weekday rentals spike during the months of June-August. Some consistently request and rent Cabin Camp 4 each season.

The park's 2005 Business plan made a goal of increasing the occupancy of cabin camps (NPS 2005a). The park aims maintains these cabin camps not only to preserve their integrity, but to ensure their continued use by visitors in effort to maintain its enabling legislation and mission.

### **Alternative A – No Action Impact Analysis.**

Under the No Action alternative Prince William Forest Park would continue to operate and manage the park under the current conditions. While the cabins are safe for public use, visitors would continue to rent out the cabins in Camp 4 with features in need of maintenance. The cabins would be maintained and upgraded on an ongoing basis as funding and staff became available. The current state of the cabins would reduce the overall visitor experience. These adverse impacts would be considered long term and minor because the poor condition of the structures would leave a slight detectable effect on the visitor use and experience.

### **Cumulative Effects**

Projects would that would impact visitor use and experience include the Remove Rock from Cabin Camp 4 spillway project; the Rehabilitate 17 Buildings in Camp 4 project; the Long Range Interpretive Plan; increased interpretive waysides, and local and regional development. The Remove Rock project would provide a beneficial impact to visitor use and experience because currently, the dam must be closed after large storms because the protruding rock forces water to erode the dam embankment during high water flows. Removing this rock would terminate this project and improve the visual appearance of the dam for visitors and allow continued use of the dam. The Long Range Interpretive plan would also provide beneficial impact to the visitor use. Increased waysides in Cabin Camp 4 would provide further interpretation for the visitors.

These impacts, in combination with the impacts associated with the No Action alternative would result in long-term negligible adverse cumulative impacts to visitor use and experience.

### **Alternative B (NPS Preferred) – Rehabilitate Cabin Camp 4 Impact Analysis.**

Under the Alternative B, 13 cabins would be rehabilitated and Building #85 would be rehabilitated and upgraded. Cabin Camp 4 would be closed to visitor rental during the time this work would occur. These impacts would be short term and minor because visitors would be unable to use cabin camp 4 for a period up to 7 months. It would be detectable that the visitors would be unable to use camp 4. Cabin, tent, RV, and backcountry camping in other areas of the Park would remain viable options for visitors during this time period. Once the rehabilitation is completed, visitors would be able to enjoy and use the rehabilitated buildings with improved plumbing, and electrical systems. In addition, Building #85 would provide housing for seasonal employees or researchers, along with becoming ADA compliant. As a result, overall impacts to visitor use and experience would be long term and beneficial.

### **Cumulative Effects**

Projects that would impact visitor use and experience include the Remove Rock from Cabin Camp 4 spillway project; the Rehabilitate 17 Buildings in Camp 4 project; the Long Range Interpretive Plan; increased interpretive waysides, and local and regional development. The Remove Rock project would provide a beneficial impact to visitor use and experience because currently the dam must be closed after large storms because the protruding rock forces water to erode the dam embankment during high water flows. Removing this rock would terminate this project and improve the visual appearance of the dam for visitors and allow continued use of the dam. The Long Range Interpretive plan would also provide beneficial impact to the visitor use. Increased waysides in Cabin Camp 4 would provide further interpretation for the visitors.

These impacts, in combination with the impacts associated with the Alternative B would result in long-term beneficial cumulative impacts to visitor use and experience.

### **Conclusion**

The No Action alternative would result in long term minor adverse impacts on visitor use and experience. Alternative B (NPS Preferred) would result in short term minor adverse and beneficial impacts due to the temporary closure of Cabin Camp 4 and the upgraded facilities visitors would enjoy after completion. There would be no impairment of park resources or values under Alternative B.

### **PARK OPERATIONS AND MANAGEMENT**

In 2004, Prince William Forest Park had an annual operating budget of approximately \$2.7 million. The Park is approximately 15,000 acres and, in 2004, reported 227,341 visitors (NPS, 2005a). The NPS is responsible for managing the Park's cultural, natural, and recreational resources, and for interpreting these resources to visitors. They are also responsible for providing for public safety and service. The Park staff operates a Visitor Center, which is open from 9:00 a.m. to 5:00 p.m. daily and is closed on Thanksgiving Day, Christmas Day, and New Year's Day. Campers staying at the campgrounds have 24 hour access to the Park (NPS, 2005a).

Prince William Forest Park is organized into three divisions (Administrative, Operations, and Maintenance) with a total of 47 staff, and four full time sub-contracted employees for the Travel Trailer Village that is located off VA 234. The Operations Division includes specialists in the following disciplines: visitor and resource protection, interpretation, natural resource management, fee management, museum curation, and cultural resource management. The Maintenance Division is responsible for the upkeep of all roads, trails, and facilities/buildings. This maintenance work requires major input of time, funding, and labor on the part of park operations. Park operations also perform ongoing repairs after storm events or effects of other weather elements.

The Division of Cabin Camps staff consists of 4 staff and 4-5 volunteer cabin camp hosts while the cabins are open. The Division of Cabin Camps staff takes reservations, give tours of the cabin camps, stock and prepare the cabin camps for visitors, provide daily custodial services, and complete minor repairs (i.e. repairing window batons or screens). All park staff and/or volunteer groups assist in a general cleaning of

the cabin camps in preparation for the season opening in May. Volunteer Cabin Camp hosts check in visitors to the cabin camp and remain on site at their assigned Cabin Camp during the operating season.

### **Alternative A – No Action Impact Analysis**

Under the No Action alternative Prince William Forest Park would continue to operate and manage the park under the current conditions. Continued visitor use, weather damage, and expected wear of the buildings would occur. Park staff would conduct ongoing rehabilitation and repair work on the buildings as funding became available. These impacts would be long term and minor because additional work would be created for park staff to make repairs on the cabins. Repairs would be made individually and over a period of time. These effects would be detectable in park operations.

### **Cumulative Effects**

Future proposed projects within the park that could affect park operations and management include the new access entrance on VA 234, the planned resurfacing of public roads and the rehabilitation of parking areas, and the Remove Rock from Cabin Camp 4 project. All of these proposed future projects would require additional funding and increases in the overall workloads of park staff. These impacts would be detectable; however, they would be of a magnitude that would not have an appreciable effect on the overall NPS operations.

These impacts, when combined with the long-term minor adverse impacts of Alternative A, would result in long-term minor adverse cumulative impacts.

### **Alternative B (NPS Preferred) – Rehabilitate Cabin Camp 4 Impact Analysis.**

Under the Alternative B, 13 historic structures would be rehabilitated and Building #85 would be rehabilitated and upgraded to include a kitchenette. During the initial efforts to rehabilitate Cabin Camp 4, there would be a noticeable effect on park operations as this would likely require the attention of several park staff and loss of revenue while the camp is closed. These adverse impacts, however, would be short-term and minor. After this effort is completed however, the continual maintenance of deteriorating conditions for Cabin Camp 4 would be diminished significantly, allowing park staff to concentrate on others operational needs in the Park; resulting in long-term and beneficial impacts.

### **Cumulative Effects**

Future proposed projects within the park that could affect park operations and management include the new access entrance on VA 234, the planned resurfacing of public roads and the rehabilitation of parking areas, and the Remove Rock from Cabin Camp 4 project. All of these proposed future projects would require additional funding and increases in the overall workloads of park staff. These impacts would be detectable; however, they would be of a magnitude that would not have an appreciable effect on the overall NPS operations.

These impacts, when combined with the short-term minor adverse and long-term beneficial impacts of Alternative B, would result in long-term minor adverse cumulative impacts.

### **Conclusion**

The No Action alternative would result in long term minor adverse impacts to park operations and management. There would also be long-term minor adverse cumulative impacts.

Alternative B (NPS Preferred) would result in the temporary closure of the cabin camp buildings. This would result in short-term minor adverse impacts. After construction the cabin camps would be available for rental again and park operations would resume. This impact would be beneficial for park operations and management. In addition, cumulative impacts would be long-term and minor.

## **COORDINATION AND CONSULTATION**

Coordination with state and federal agencies was conducted during the NEPA process to identify issues and/or concerns related to natural and cultural resources within Prince William Forest Park. All consultations with the State Historic Preservation Officer, as mandated in Section 106 of the National Historic Preservation Act of 1966, are occurring as part of the development of this EA. The NPS is conducting Section 106 consultation with the Virginia Department of Historic Resources as part of this project. PRWI sent a letter to the Virginia Department of Historic Resources on June 17, 2009 to make them aware of their intention to use the EA to complete Section 106 consultation. A copy of this letter is in Appendix A.

In accordance with section 7 of the Endangered Species Act and 50 CFR 402 Subpart B, PRWI notified USFWS and the Virginia Natural Heritage Program of the proposed project on June 17, 2009. The Virginia Department of Agriculture and Consumer Services was also notified on June 19, 2009. Copies of these coordination letters are provided in Appendix A. The Park received concurrence from the VADNH on July 16, 2009 via electronic correspondence; concurrence was received from the USFWS on July 24, 2009 through oral communication. Since Prince William County is located within the Virginia Coastal Zone Management Area, coordination with the VA DEQ under the Coastal Zone Management Act was initiated on June 19, 2009. A copy of the letter to VA DEQ is provided in Appendix A.

In addition, published information was obtained from the following agencies:

- U.S. Department of the Interior, Fish and Wildlife Service
- Virginia Department of Natural Resources
- Virginia State Historic Preservation Office
- Prince William County



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## **LIST OF PREPARERS**

### **NATIONAL PARK SERVICE – Prince William Forest Park**

George Liffert, Acting Superintendent  
Paul Petersen, Acting Chief of Resource Management  
Colette Carmouche, Museum Technician  
Jim Pieper, Acting Biologist  
Scott Shea, Buildings and Utilities Foreman  
Laura Cohen, Chief of Interpretation

### **NATIONAL PARK SERVICE – National Capital Region**

Joel Gorder, Regional Environmental Coordinator and Lands Liaison

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<http://www.nps.gov/policy/DOrders/DO77-2--Floodplains.pdf>  
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2004 Draft: Long Range Interpretive Plan, Prince William Forest Park.  
2005a Prince William Forest Park Business Plan.  
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<http://www.nature.nps.gov/stats/viewReport.cfm 12/>
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## **APPENDIX A - CONSULTATIONS**



IN REPLY REFER TO:

## United States Department of the Interior

### NATIONAL PARK SERVICE

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

L7617 (PRWI)

June 17, 2009

Ms. Kathleen Kilpatrick,  
State Historic Preservation Officer  
Virginia Department of Historic Resources  
2801 Kensington Avenue  
Richmond, VA 23221

ATTN: *Ethel Eaton*  
Reference: Rehabilitate 14 cabins in Cabin Camp 4 at Prince William Forest Park  
Subject: Compliance with Section 106 of the National Historic Preservation Act  
and National Environmental Policy Act

Dear Ms Kilpatrick:

The National Park Service (NPS) is beginning to study alternatives to rehabilitate a number of buildings in Cabin Camp 4 at Prince William Forest Park (PRWI), Triangle, Virginia. These actions are funded by monies released by the American Relief and Recovery Act (ARRA) of 2009.

We have begun the National Environmental Policy Act (NEPA) process for this project and are beginning preparation for drafting an environmental assessment. In accordance with 36 CFR 800.8 © of the Advisory Council on Historic Preservation regulations, I am notifying your office in advance of the park's intention to use the NEPA process to meet its obligations under Section 106 of the National Historic Preservation Act.

Attached to this letter is a full description of the work identified in the project. Please review and provide notification of the Virginia State Historic Preservation Office's concurrence by signing below.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date







IN REPLY REFER TO:

## United States Department of the Interior

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

H30

June 17, 2009

Tylan Dean  
Endangered Species & Federal Activities  
US Fish & Wildlife Services Ecological Services  
Virginia Field Office  
6669 Short Lane  
Gloucester, VA 23061

*Reference:* Rehabilitate 14 Cabins at Cabin Camp 4, Prince William Forest Park (PRWI)

*Subject:* Compliance with Section 7 of the Endangered Species Act and National Environmental Policy Act

Dear Mr. Dean:

The National Park Service (NPS) is beginning to plan for the repair and rehabilitation of 14 historic cabins at Cabin Camp 4 (Camp Pleasant), in Prince William Forest Park. The cabins are listed on the National Register of Historic Places as significant in the State of Virginia.

We are beginning the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) Section 106 process for this project, and are drafting an Environmental Assessment for the proposed work. In accordance with Section 7 of the Endangered Species Act and 50 CFR 402 Subpart B, the NPS is notifying your office in advance of the park's intention to use the NEPA process to meet its management obligations.

We have worked closely with the Virginia Department of Natural Heritage (VADNH) to inventory and monitor the federally threatened species, *Isotria medeoloides* or small whorled pogonia, a plant that occurs in PRWI. Currently, park managers, along with other specialists, are completing an *Isotria* Management Plan. This plan, developed by the VADNH, takes into consideration multiple surveys of *Isotria medeoloides* conducted from 1983 through 2007. Suitability modeling and surveys have identified approximately 3000 acres of land within PRWI as potential *Isotria medeoloides* habitat, and subsequently these lands have been surveyed for species presence and absence. Currently, there are 19 known locations of the plant in the park, ranging from single individuals to colonies of up to 28 plants.

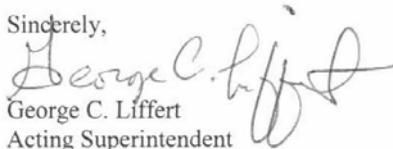
Of the 19 known colonies of *Isotria medeoloides* in Prince William Forest Park, five are located approximately 500 to 800 meters east of Cabin Camp 4 (77° 21' 15" W, 38° 35' 29" N). The area of potential effect for the rehabilitation and repair of the structures does not extend outside of Cabin Camp 4. We would appreciate the USFWS concurrence that threatened and endangered species will be dismissed as an impact topic for the environmental document, and that no further analysis is required.

Also, we have worked in collaboration with the VADNH to identify Natural Heritage Areas within the park boundary. This includes eastern hemlock habitat, seepage swamps, and rare or threatened species such as *Carex vestita*. Of these known sites, no Natural Heritage Areas reside in or within the immediate vicinity of Cabin Camp 4, the area of potential effect.

The proposed work is to be conducted solely on structures (cabins) and in the area immediately surrounding the structures (within 20 feet). We appreciate your concurrence on behalf of the USFWS that the identified actions will have no effect on threatened and endangered species or Natural Heritage Areas.

We look forward to working with your organization, and other consulting parties, and the public as we proceed with the environmental planning process for this project. If you believe more details are needed for your assessment, we can arrange a meeting with you and your staff at your convenience. Please contact me at (703) 221-2366 (email [George\\_Liffert@nps.gov](mailto:George_Liffert@nps.gov)), or Mr. Paul Petersen, Acting Chief of Resource Management at (703) 221-3299 (email [Paul\\_E\\_Petersen@nps.gov](mailto:Paul_E_Petersen@nps.gov)).

Sincerely,

  
George C. Liffert  
Acting Superintendent



IN REPLY REFER TO:

## United States Department of the Interior

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

H30

June 17, 2009

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

**Reference:** Rehabilitate 14 Cabins at Cabin Camp 4, Prince William Forest Park (PRWI)  
**Subject:** Compliance with Section 7 of the Endangered Species Act and National Environmental Policy Act

Dear Ms. Hypes:

The National Park Service (NPS) is beginning planning to repair and rehabilitate 14 historic cabins at Cabin Camp 4 (Camp Pleasant), in Prince William Forest Park. The cabins are listed on the National Register of Historic Places as significant in the State of Virginia.

We are beginning the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) Section 106 process for this project, and are drafting an Environmental Assessment for the proposed work. In accordance with Section 7 of the Endangered Species Act and 50 CFR 402 Subpart B, the NPS is notifying your office in advance of the park's intention to use the NEPA process to meet its management obligations.

The park has worked closely with the Virginia Department of Natural Heritage (VADNH) to inventory and monitor the federally threatened species, *Isotria medeoloides* or small whorled pogonia, a plant that occurs in PRWI. Currently, park managers along with other specialists are completing an *Isotria* Management Plan. This plan, developed by the VADNH, takes into consideration multiple surveys of *Isotria medeoloides* conducted from 1983 through 2007. Suitability modeling and surveys have identified approximately 3000 acres of land within PRWI as potential *Isotria medeoloides* habitat, and subsequently these lands have been surveyed for species presence and absence. Currently, there are 19 known locations of the plant in the park, ranging from single individuals to colonies of up to 28 plants.

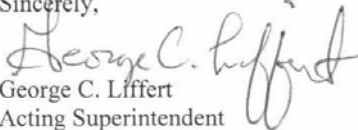
Of the 19 known colonies of *Isotria medeoloides* in Prince William Forest Park, five are located approximately 500 to 800 meter east of Cabin Camp 4 (77° 21' 15" W, 38° 35' 29" N). The area of potential effect for the rehabilitation and repair of the structures does not extend outside of Cabin Camp 4. We appreciate the concurrence of the Virginia Natural Heritage Program that threatened and endangered species will be dismissed as an impact topic for the environmental document, and that no further analysis is required.

Also, the Park has worked in collaboration with the VADNH to identify Natural Heritage Areas in the Park's boundary. These include eastern hemlock habitat, seepage swamps, and state listed rare or threatened species such as *Carex vestita*. Of these known sites, no Natural Heritage Areas reside in or within the immediate vicinity of Cabin Camp 4, the area of potential effect.

The work is to be conducted solely on structures (cabins) and in the area immediately surrounding the structures (within 20 feet). We appreciate your concurrence on behalf of the VADNH that the identified actions will have no effect on threatened and endangered species or Natural Heritage Areas.

We look forward to working with your organization, and other consulting parties, and the public as we proceed with the environmental planning process for this project. If you believe more details are needed for your assessment, we can arrange a meeting with you and your staff at your convenience. Please contact me at (703) 221-2366 (email [George\\_Liffert@nps.gov](mailto:George_Liffert@nps.gov)), or Mr. Paul Petersen, Acting Chief of Resource Management at (703) 221-3299 (email [Paul\\_E\\_Petersen@nps.gov](mailto:Paul_E_Petersen@nps.gov)).

Sincerely,

  
George C. Liffert  
Acting Superintendent



IN REPLY REFER TO:

## United States Department of the Interior

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

H30

June 19, 2009

Keith Tignor  
Virginia Department of Agriculture and Consumer Services  
600 N. 5th Street, Room 210  
Richmond, VA 23219

*Reference:* Rehabilitate 14 Cabins at Cabin Camp 4, Prince William Forest Park (PRWI)  
*Subject:* Compliance with Section 7 of the Endangered Species Act and National Environmental Policy Act

Dear Mr. Tignor:

The National Park Service (NPS) is beginning planning to repair and rehabilitate 14 historic cabins at Cabin Camp 4 (Camp Pleasant), in Prince William Forest Park. The cabins are listed on the National Register of Historic Places as significant in the State of Virginia.

We are beginning the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) Section 106 process for this project, and we are drafting an Environmental Assessment for the work. In accordance with Section 7 of the Endangered Species Act and 50 CFR 402 Subpart B, the NPS is notifying your office in advance of the park's intention to use the NEPA process to meet its management obligations.

We have worked closely with the Virginia Department of Natural Heritage (VADNH) to inventory and monitor the federally threatened species, *Isotria medeoloides* or small whorled pogonia, a plant that occurs in PRWI. Currently, park managers, along with other specialists, are completing an *Isotria* Management Plan. This plan, developed by the VADNH, takes into consideration multiple surveys of *Isotria medeoloides* conducted from 1983 through 2007. Suitability modeling and surveys have identified approximately 3000 acres of land within PRWI as potential *Isotria medeoloides* habitat, and subsequently these lands have been surveyed for species presence and absence. Currently, there are 19 known locations of the plant in the park, ranging from single individuals to colonies of up to 28 plants.

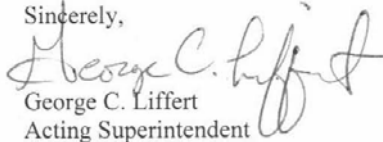
Of the 19 known colonies of *Isotria medeoloides* in Prince William Forest Park, five are located approximately 500 to 800 meters east of Cabin Camp 4 (77° 21' 15" W, 38° 35' 29" N). The area of potential effect for the rehabilitation and repair of the structures does not extend outside of Cabin Camp 4. We appreciate the concurrence of the Virginia Department of Agriculture and Consumer Services that threatened and endangered species will be dismissed as an impact topic for the environmental document, and that no further analysis is required.

We have also worked in collaboration with the VADNH to identify Natural Heritage Areas in the Park's boundary. These include eastern hemlock habitat, seepage swamps, and state listed rare or threatened species such as *Carex vestita*. Of these known sites, no Natural Heritage Areas reside in or within the immediate vicinity of Cabin Camp 4, the area of potential effect.

The work is to be conducted solely on structures (cabins) and in the area immediately surrounding the structures (within 20 feet). We appreciate VDACS concurrence that the identified actions will have no effect on threatened and endangered species or Natural Heritage Areas.

We look forward to working with your organization, other consulting parties, and the public as we proceed with the environmental planning process for this project. If you believe more details are needed for your assessment, we would be happy to arrange a meeting with you at your convenience. Please contact me at (703) 221-2366 (email [George\\_Liffert@nps.gov](mailto:George_Liffert@nps.gov)), or Mr. Paul Petersen, Acting Chief of Resource Management at (703) 221-3299 (email [Paul\\_E\\_Petersen@nps.gov](mailto:Paul_E_Petersen@nps.gov)).

Sincerely,

  
George C. Liffert  
Acting Superintendent



IN REPLY REFER TO:

## United States Department of the Interior

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

H30

June 19, 2009

Ellie Irons  
Virginia DEQ  
Environmental Impact Review Program Manager  
629 East Main Street  
P.O. Box 1105, Richmond, VA 23218

*Reference:* Rehabilitate 14 Cabins at Cabin Camp 4, Prince William Forest Park (PRWI)  
*Subject:* Compliance with the National Environmental Policy Act, and Coastal Zone Management Act and Code of Virginia

Dear Ms. Irons:

The National Park Service (NPS) is beginning planning to repair and rehabilitate 14 historic cabins at Cabin Camp 4 (Camp Pleasant), in Prince William Forest Park. The cabins are listed on the National Register of Historic Places as significant in the State of Virginia.

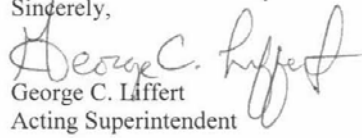
We have begun the National Environmental Policy Act (NEPA) process for this project and we are drafting an Environmental Assessment for the work. The park seeks to comply with its obligation to seek federal consistency with the policies of the Coastal Zone Management Act, as well as the National Environmental Policy Act, and the Code of Virginia (§ 10.1-1186. General Powers of the Department) "5. Implement all regulations as may be adopted by the State Air Pollution Control Board, the State Water Control Board, and the Virginia Waste Management Board."

We have also worked in collaboration with the VADNH to identify Natural Heritage Areas in the Park's boundary. These include eastern hemlock habitat, seepage swamps, and state listed rare or threatened species such as *Carex vestita*. Of these known sites, no Natural Heritage Areas reside in or within the immediate vicinity of Cabin Camp 4, the area of potential effect.

The work is to be conducted solely on structures (cabins) and in the area immediately surrounding the structures (within 20 feet). We appreciate VDEQs concurrence that the identified actions will have no effect on threatened and endangered species or Natural Heritage Areas.

We look forward to working with your organization, other consulting parties, and the public as we proceed with the environmental planning process for this project. If you believe more details are needed for your assessment, we would be happy to arrange a meeting with you at your convenience. Please contact me at (703) 221-2366 (email [George\\_Liffert@nps.gov](mailto:George_Liffert@nps.gov)), or Mr. Paul Petersen, Acting Chief of Resource Management at (703) 221-3299 (email [Paul\\_E\\_Petersen@nps.gov](mailto:Paul_E_Petersen@nps.gov)).

Sincerely,

  
George C. Liffert  
Acting Superintendent





# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Ecological Services  
6669 Short Lane  
Gloucester, Virginia 23061



Memorandum

AUG 21 2009

To: Acting Superintendent, Prince William Forest Park  
(Attn: Paul Petersen, Acting Chief of Resource Management)

From: Supervisor, Virginia Field Office *Cynthia A. [Signature]*

Subject: Rehabilitate 14 Cabins at Camp 4, Prince William Forest Park  
(Project # 2009-I-0454)

The U.S. Fish and Wildlife Service (Service) has reviewed your request for information on Federally listed endangered and threatened species and designated critical habitat for the referenced project. The following comments are provided under provisions of the Endangered Species Act of 1973 (16 U.S.C. 1531-1544, 87 Stat. 884), as amended.

The Service received your letter on June 9, 2009 regarding the potential for the proposed rehabilitation and repair of 14 cabins at Cabin Camp 4 (Camp Pleasant) in Prince William Forest Park to impact the Federally listed threatened small whorled pogonia (*Isotria medeoloides*). Prince William Forest Park personnel have worked with the Virginia Department of Conservation and Recreation Natural Heritage Program to inventory and monitor this species on the property, and no occurrences are within the project area. Based on the project description and location, it appears that no impacts to Federally listed species or designated critical habitat will occur and the Service agrees that further analysis is not required. Should project plans change or if additional information on the distribution of listed species or critical habitat becomes available, this determination may be reconsidered.

Species information and other pertinent information on project reviews within Virginia is available at our website [http://www.fws.gov/northeast/virginiafield/Project\\_Reviews.html](http://www.fws.gov/northeast/virginiafield/Project_Reviews.html). If you have any questions, please contact Sumalee Hoskin of this office at (804) 693-6694, extension 136.

(filename:P:\Endangered Species\Sec7\2009\2009-I-0454 (Rehab Cabins Camp 4 Prince William Forest Park).doc)

Mailing address:

National Park Service  
Prince William Forest Park  
18100 Park Headquarters Road  
Triangle, Virginia 22172

**"nhreview nhreview"**  
**<nhreview.po-**  
**richmond.dom-**  
**richmond@dcr.virginia.gov>**

07/16/2009 01:11 PM

To<Paul\_E\_Petersen@nps.gov>

cc<Tylan\_Dean@fws.gov>,  
<keith.tignor@vdacs.virginia.gov>

SubjectRe: Prince William Forest Park-  
Rehabilitate 14 Cabins at Cabin  
Camp 4

Paul,

Thank you for the smaller scale project area map. Nancy VanAlstine, DCR field botanist, has reviewed the map and does not anticipate adverse impact to the documented natural heritage resources due to the distance to the resources.

Please let me know if you need any additional information.

Rene '

S. Rene' Hypes  
Project Review Coordinator  
DCR-DNH  
217 Governor Street  
Richmond, Virginia 23219  
804-371-2708 (phone)  
804-371-2674 (fax)  
Rene.Hypes@dcr.virginia.gov