

8

SECTION 4(f) EVALUATION

8.1 INTRODUCTION

Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended (49 USC 303(c)), stipulates that federally funded or approved transportation projects may not use land from a publicly owned public park, recreation area, wildlife or waterfowl refuge, or from a significant historic site, unless there is no feasible or prudent alternative to the use. Significant historic sites are those that are listed in, or eligible for listing in, the National Register of Historic Places. Such use requires documentation that the proposed action includes all possible planning to minimize harm to the protected properties. In addition, Section 6(f) of the Land and Water Conservation Fund Act of 1965, as amended (16 USC 4601-8 (f)), requires land conversion approval by the U.S. Department of Interior where funds provided to a state under the statute were used to purchase or develop parklands or recreational facilities that would be used by a proposed action.

The Manassas National Battlefield Park Amendment Act of 1980 allowed for the Route 234 Bypass to be located to the east of Pageland Lane within The Park. In addition, the Manassas National Battlefield Park Amendments of 1988 adopting this study directs FHWA and NPS to study alternatives within and in the vicinity of the Park itself and the circumferential routes needed to avoid all of the Section 4(f) resources would be inconsistent with this directive.

8.2 PROPOSED ACTION

FHWA, in conjunction with NPS, proposes to close US Route 29 and VA Route 234 within the Manassas National Battlefield Park and to provide an alternative means of transportation for the traffic that is currently using those two routes within the Park. The closure is needed to enhance Park experience, improve historic preservation efforts, and allow for better Park operation and management. The Park experiences daily congestion within the center of the Park on both Routes 29 and 234, as well as heavy volumes of cut-through commuter traffic traversing some of the most sensitive historic resources in the Park. The presence of this congestion has a negative effect on the MNPB, which is a designated 4(f) resource. Relocations of Route 29 and 234 are needed to help preserve this 4(f) resource. Chapter 1 describes the Purpose and Need for the proposed improvements and Chapter 2 describes the alternatives.

8.3 SECTION 4(f) PROPERTIES

As listed in **Table 8-1** and shown on **Figure 8-1**, there are 5 properties within the primary study area subject to protection under Section 4(f). They include county parks, a state-owned forest, and the Manassas National Battlefield Park and associated Historic District. This is a preliminary list since a full eligibility determination for potentially eligible National Register sites for cultural resources has not been completed at this time for all of the alternatives under consideration, as discussed in Chapter 4 of this DEIS. However, many of the individual cultural resources are contributing elements to the Manassas National Battlefield Historic District, as identified in the district's recently adopted amended boundary, which is discussed in this chapter. As discussed in Chapter 4, detailed eligibility determinations and cultural resource surveys will be conducted once a preferred alternative has been formally selected following the public review period for the DEIS. At that time additional 4(f)

resources associated with historic properties might be identified in addition to those shown in Table 8-1. Table 8-1 only identifies 4(f) resources located to the north of Interstate 66. There are additional resources such as Bull Run Regional Park located to the south of I-66 that were also analyzed as part of the early concept screening process that are not included. None of the current Candidate Build Alternatives would impact those 4(f) resources in any manner.

TABLE 8-1: SECTION 4(f) PROPERTIES

Name	Facilities / Amenities
FCPA Site (formerly known as the Hunter Hacor Assemblage, an agricultural and forestall district)	Natural Areas, Open Space (all uses not yet planned)
FCPA Site (recently acquired from Fairfax National Estates Golf Course through Board of Supervisors)	Natural Areas, Historic Sites (all uses not yet planned)
Manassas National Battlefield Park and Historic District	Indoor Visitors Center, Community Center, Recreational Trails, Historic Sites, Picnic Areas, Natural Areas, Open Space
Sudley Park (Site)	Ball Diamonds, Multi-Use Fields, Picnic Areas, Open Space
Conway Robinson Memorial State Forest	Recreational Trails, Picnic Areas, Natural Areas, Open Space

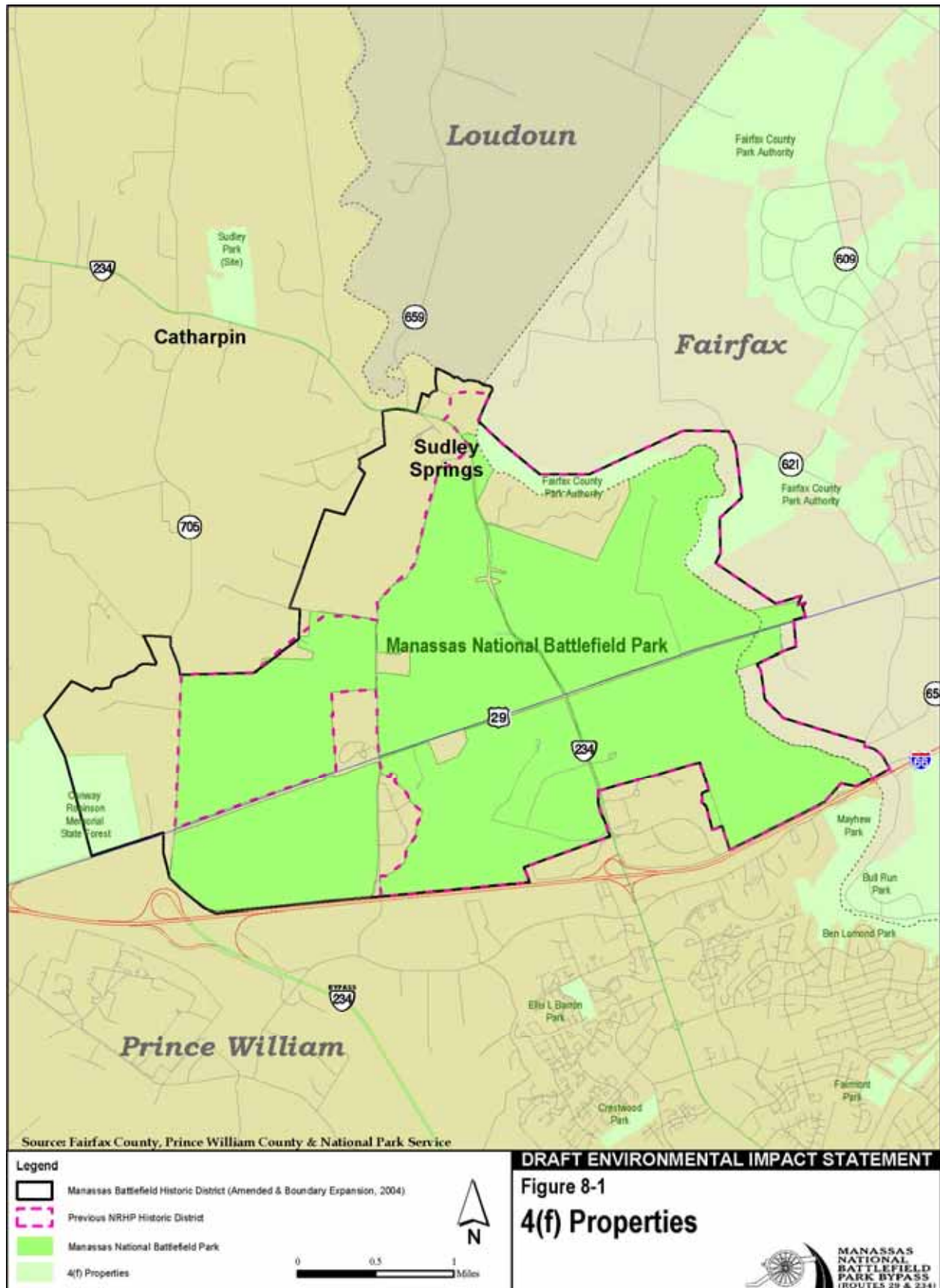
The parks and recreational facilities are owned and operated by the Fairfax County Park Authority, the National Park Service, the Prince William County Park Authority or the Virginia Department of Forestry. Three of the sites listed above are under development: the Hunter Hacor Assemblage was an agricultural / forestall district recently placed under the ownership of the Fairfax County Park Authority, a FCPA site just south of the Fairfax National Estates Golf Course, and the Sudley Park site which is being constructed by Prince William County Park Authority. In addition, the boundaries of the MNPB Historic District have recently been revised.

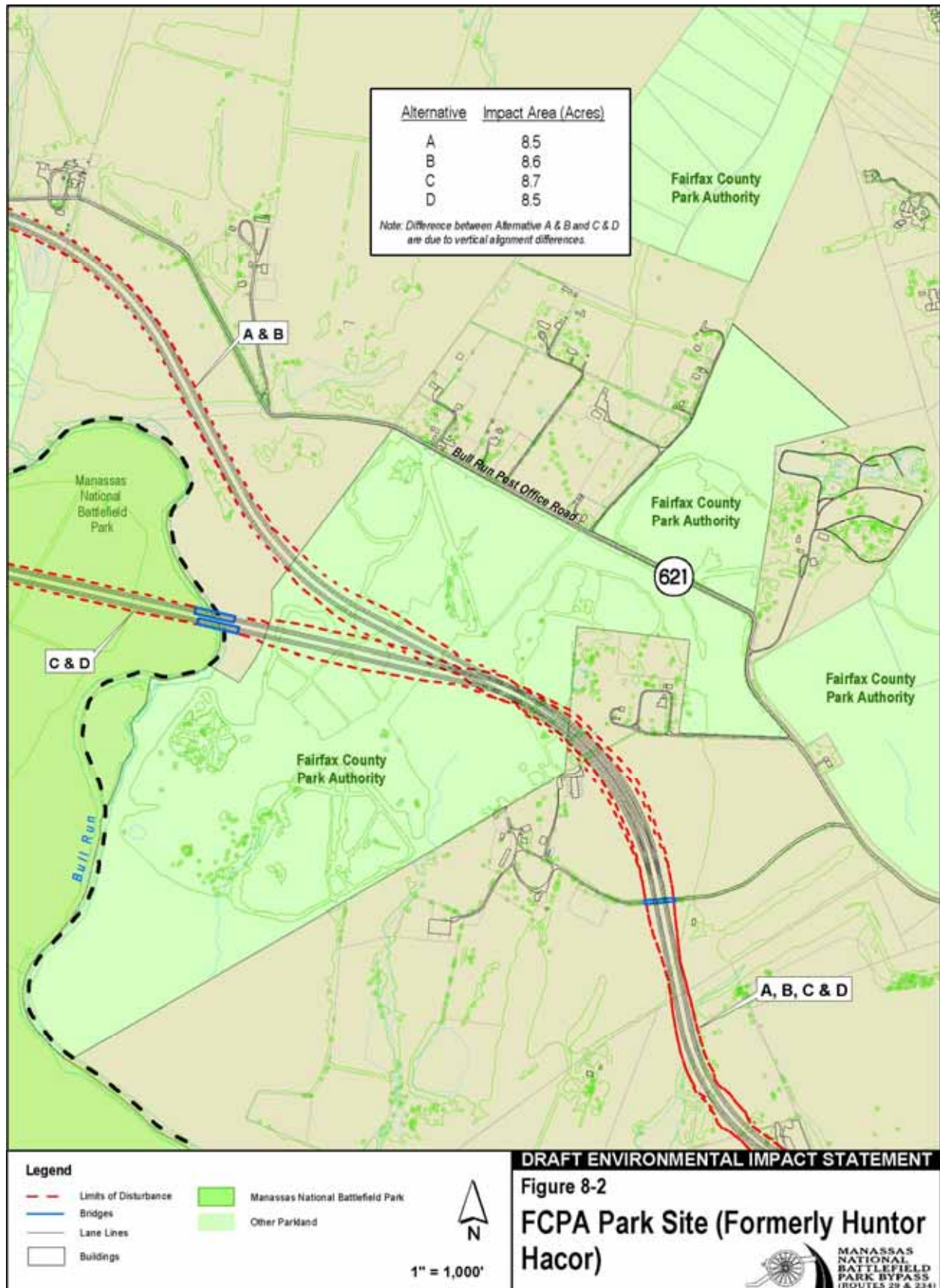
One or more of the build alternatives could require the use of land from the two FCPA sites, the Manassas National Battlefield Park and Historic District. There is no land required from either the Sudley Park site or Conway Robinson Memorial State Forest and no impacts to those resources are projected.

8.3.1 FCPA Site (formerly the Hunter Hacor Assemblage)

Description of 4(f) Property. The Hunter Hacor Assemblage was an agricultural/forestall district, but has recently become a property owned by the Fairfax County Park Authority. Preliminary information indicates that this park will primarily serve as a natural area to preserve woodlands, although there is currently not a General Management Plan for the site that specifies all of the uses intended for this resource. The site is 272 acres and is located just northeast of the Manassas National Battlefield Park and straddles Bull Run Post Office Road. Figure 8-1 shows the location of the FCPA site in relation to the Manassas National Battlefield Park. **Figure 8-2** shows how the Candidate Build Alternatives would affect the site. All of the northern Candidate Build Alternatives (A, B, C, and D) would bisect the site. There are no known planned facilities in this park that would be displaced by any of the alternatives, although the site is still in preliminary planning stages.

Ownership and Type of 4(f) Property. The site is a public park owned by the Fairfax County Park Authority.





Features and Function. Land uses within the FCPA site consist of open space, agricultural and forestall lands, and possible historic sites. The Bull Run Post Office Road bisects this site and the site is located within a low density residential community oriented around Bull Run Post Office Road. There is not a General Management Plan yet prepared for this park that can be used to identify any future potential facilities.

Eight archaeological sites have been previously recorded in this parcel. All eight sites represent prehistoric occupations ranging from the Early Archaic to the Late Woodland periods. None of these sites have been evaluated for NRHP eligibility. Two of the eight sites are located within the APE. One site will be affected by Alternatives C and D; the other site will be affected by Alternatives A through D.

Access. The only access point to the FCPA site is provided via Bull Run Post Office Road, although there are no existing sidewalks or vehicle access points into the site at this time. There are no existing vehicle parking facilities.

Relationship to Similarly Used Lands In the Vicinity. FCPA owns land in close proximity to the future park, including sites that are directly contiguous to the site both north and south of the future park. The FCPA land forms a contiguous park resource that stretches from the Manassas National Battlefield Park in a northeasterly direction to the more suburban residential areas along Route 609 in Fairfax County.

Applicable Clauses Affecting Ownership. There are no recorded reversionary clauses affecting ownership. Fairfax County funds were used to purchase the future park. No Land and Water Conservation Fund (LWCF) monies were used to acquire or develop the park.

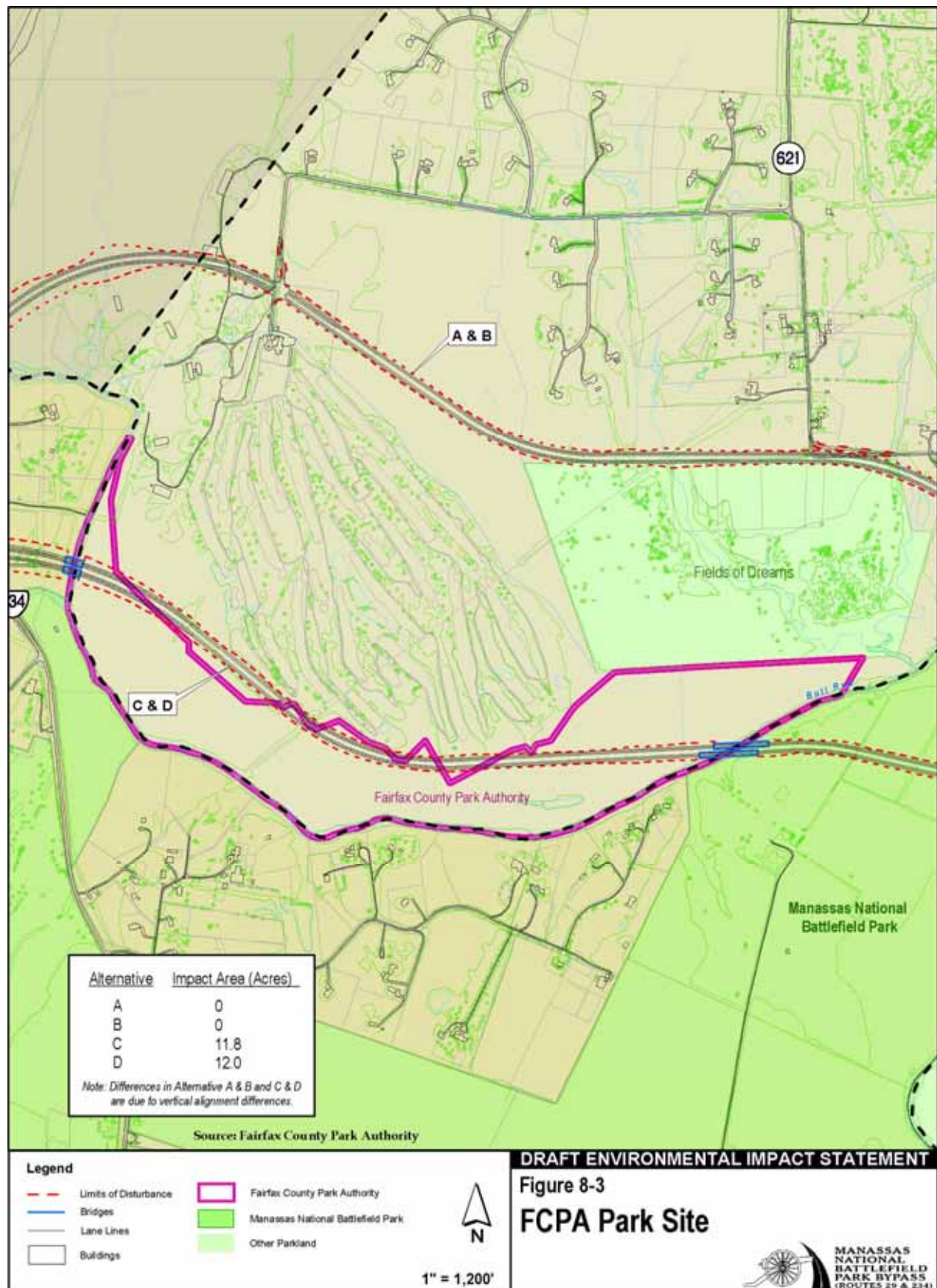
Unusual Characteristics. The future park has no unusual characteristics.

8.3.2 FCPA Site (located south of Fairfax National Estates Golf Course)

Description of 4(f) Property. The FCPA recently acquired land from the Fairfax County Board of Supervisors along Bull Run just south of the Fairfax National Estates Golf Course. There is currently not a General Management Plan for the site that specifies all of the uses intended for this resource, but preliminary discussions with FCPA indicate that the site could be used for recreational trails, open space preservation, and protection of historic sites. The site consists of two parcels that total 132 acres and is located just north of the Manassas National Battlefield Park. **Figure 8-3** shows how the Candidate Build Alternatives would affect the site. Two of the northern Candidate Build Alternatives (C and D) would require land from within the future park. There are no known planned facilities in this park that would be displaced by any of the alternatives, although the site is still in preliminary planning stages.

Ownership and Type of 4(f) Property. The site is a future public park owned by the Fairfax County Park Authority.

Features and Function. Land uses within the FCPA site consist of open space and possible historic sites, and much of the site is located within the Legislative Boundary of the Manassas National Battlefield Park. Much of the site is also located along the stream valley within the 100-year floodplain along Bull Run. Four cultural resources are identified in this FCPA parcel and consist of the Unfinished Railroad, Sudley Ford on Bull Run, and two high probability areas containing numerous unrecorded Civil War battlefield-associated archaeological sites (Bull Run and Poplar Ford areas). The Unfinished Railroad and any Civil War related archaeological sites are considered contributing elements of the Manassas National Battlefield Historic District. Sudley Ford on Bull



Run has not been evaluated for NRHP eligibility. The Unfinished Railroad segment in this parcel, Sudley Ford on Bull Run and the Poplar Ford Civil War probability area will be impacted by Alternatives A through D; the Bull Run probability area will be affected by Alternatives C and D. There is not a General Management Plan yet prepared for this park that can be used to identify any future potential facilities.

Access. There are no roadways that provide access to this park at this time. The closest pedestrian access points, although none have been specified at this time, would travel through the Fairfax National Estates Golf Course, the Fields of Dreams site, or the residential neighborhood of Bull Run Overlook in Prince William County. No access plans have been formally developed for this future park at this time.

Relationship to Similarly Used Lands In the Vicinity. FCPA owns land in close proximity to the future park, including sites that are similar in characteristics and that also border Bull Run and the Manassas National Battlefield Park.

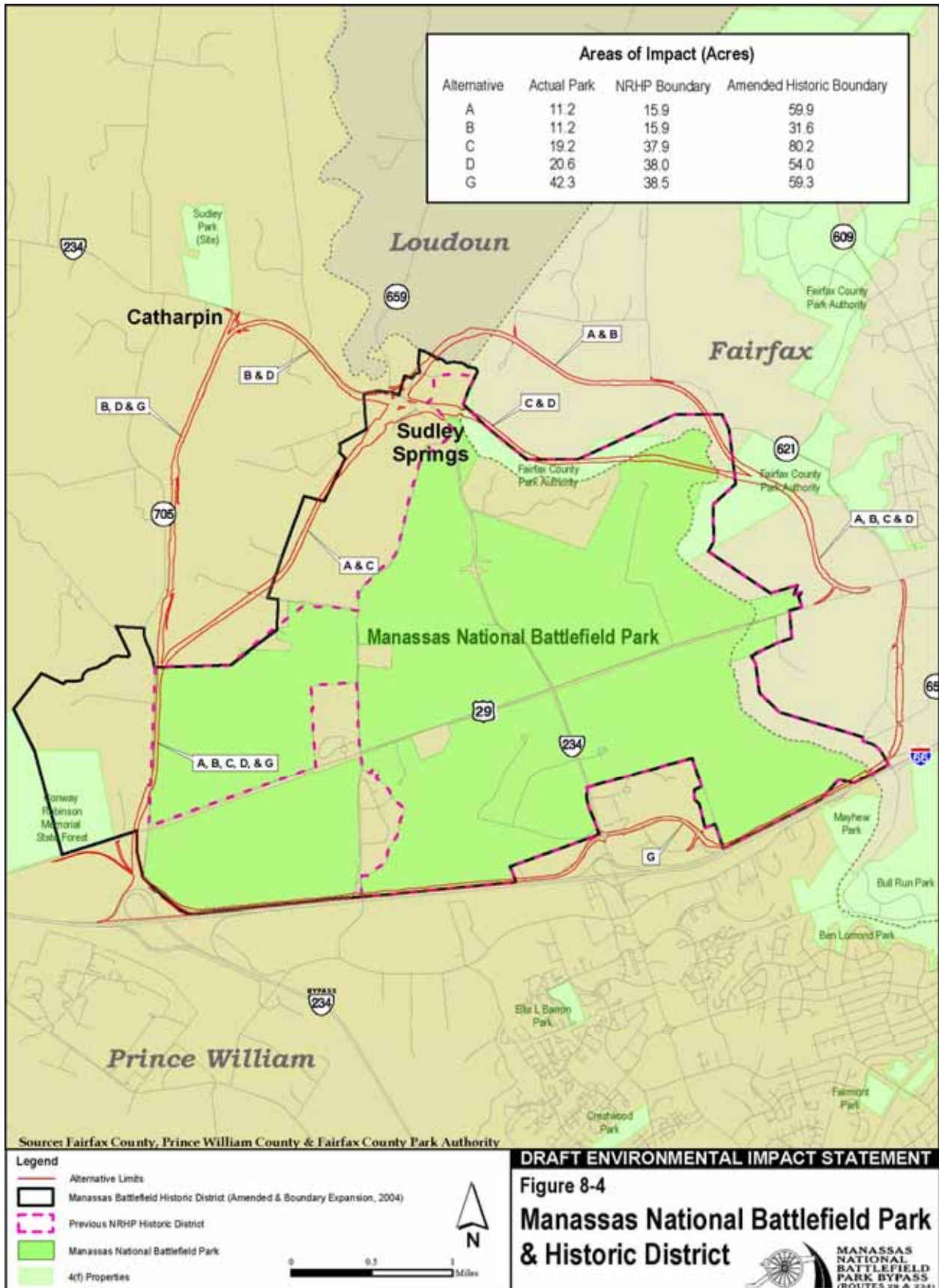
Applicable Clauses Affecting Ownership. There are no recorded reversionary clauses affecting ownership. Fairfax County funds were used to purchase the future park. No Land and Water Conservation Fund (LWCF) monies were used to acquire or develop the park.

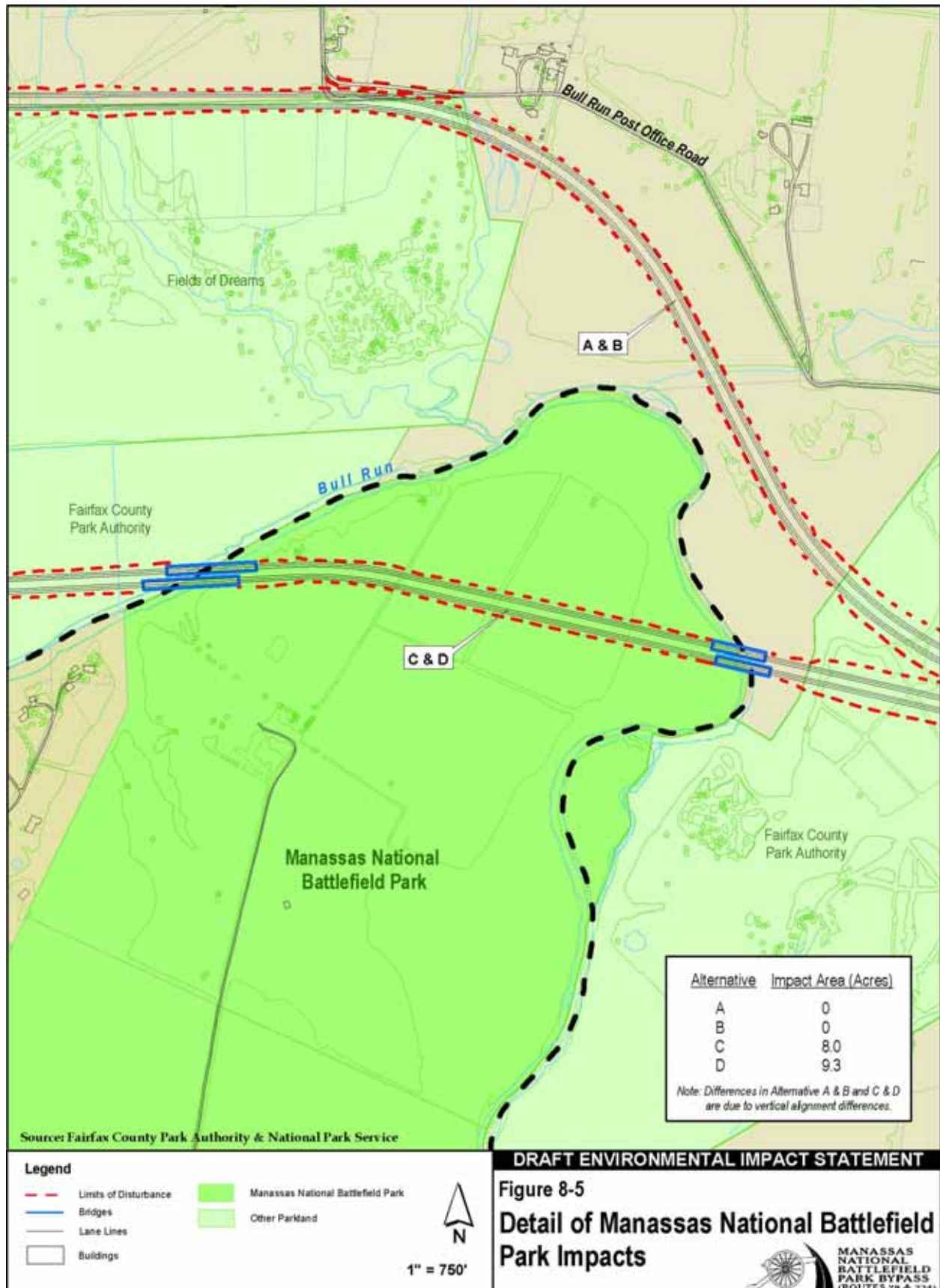
Unusual Characteristics. The future park has no unusual characteristics.

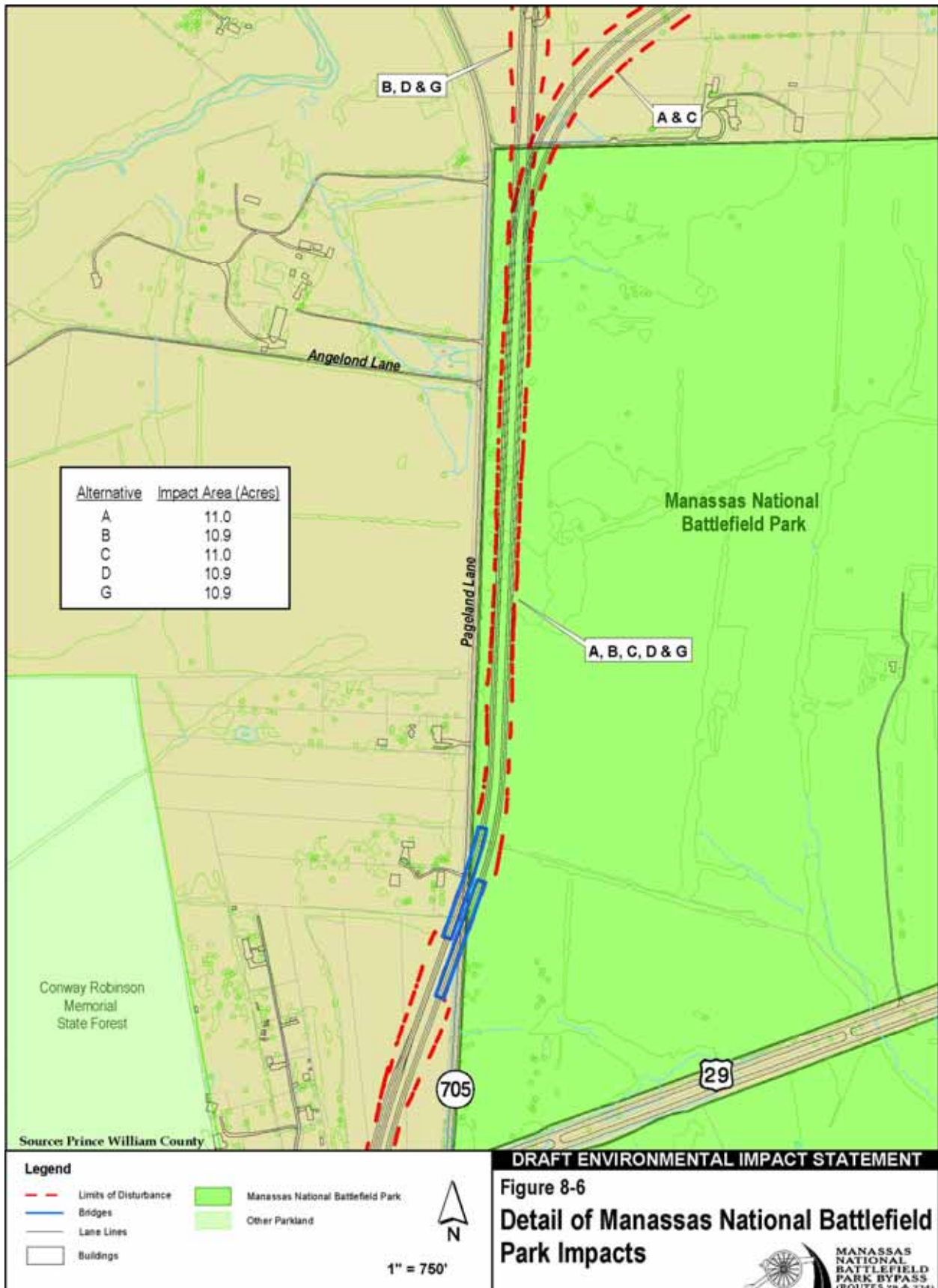
8.3.3 Manassas National Battlefield Park and Historic District

Description of 4(f) Property. The Manassas National Battlefield Park consists of approximately 5,072 acres of mostly rolling terrain and commemorates two significant Civil War battles. The borders of the Park are fairly well defined by the roads and natural features in the area: Interstate 66 (I-66) to the south, Pageland Lane (Route 705) to the west, and Bull Run to the north and east. The associated Historic District, which has been recently amended as an initiative of the National Park Service in consultation with the Virginia Department of Historic Resources and Prince William County, includes additional land for a total acreage of 6,421 acres. The amended district is generally bounded by Bull Run, I-66, Stony Ridge, inclusive of Featherbed Lane, a portion of Pageland Lane, Groveton Road, Warrenton Turnpike (Route 29), and Sudley Road (Route 234). On October 6, 2004 the revised nomination was approved by the Virginia Landmarks Register and was also approved by the Historic Resources Board for listing in the Virginia Landmarks Register and was also approved by the State Review Board for recommendation to be forwarded to the Keeper of the National Register. **Figure 8-4** shows the location of the Manassas National Battlefield Park and Historic District and the proposed Candidate Build Alternatives. **Figures 8-5 and 8-6** are detailed maps of the Candidate Build Alternative in relation to portions of the Park showing. All of the proposed Candidate Build Alternatives (A, B, C, D and G) would take land from within the Park and the Historic District. The northern alternatives C and D intersect the northeast corner of the Park as shown in Figure 8-5 and all alternatives could be located within the Park east of Pageland Lane as shown in Figure 8-6. Alternative G is located within the southern portion of the Park north of I-66 and is shown in Figure 8-4.

Ownership and Type of Property. The Manassas National Battlefield Park is a public park operated by the National Park Service, and owned by the US Department of the Interior. Within the Park boundaries, the Commonwealth of Virginia and individual property owners own approximately 500 acres, including the land used for public highways that include Route 29 and Route 234. Additional land within the Historic District is owned by multiple private property owners, the Fairfax County Park Authority (as discussed above), and the Virginia Outdoors Foundation, which owns a tract of land known as the Davis Tract. The Manassas Battlefield







Historic District is a historic district determined by VDHR to be eligible for the NRHP under all four of the National Register Criteria and is significant under the themes of military, archeology, architecture, and commemoration with national significance for the period between 1820 and 1942. For its association with events that have made a significant contribution to the broad patterns of history, the Manassas Battlefield meets Criterion A of the NRHP. The Manassas Battlefield meets Criterion B of the NRHP for its association with both Robert E. Lee and Thomas J. “Stonewall” Jackson. As a result of the engagements fought at Manassas Battlefield, at least twenty-six monuments and markers have been placed around the battlefield to commemorate events and thus the Battlefield meets Criterion C of the NRHP. Finally, archeological investigations in the Park continue to contribute information about history and pre-history and thus, the Battlefield is also eligible under Criterion D of the NRHP.

Features and Function. Manassas National Battlefield Park was established in 1940. The Park is located approximately 25 miles southwest of Washington, D.C., in Prince William County, Virginia, southwest of the Washington Dulles International Airport. The Park is one of 31 existing Civil War battlefields in the National Park System and was the site of two significant Civil War battles. The first major engagement of the Civil War, the First Battle of Manassas, was fought on July 21, 1861 on land that is now a part of the Park. A little over a year later, in August of 1862, the Second Battle of Manassas, a larger battle resulting in greater casualties, was also fought at the site. Both battlefield sites can be visited at the Park, which receives approximately 800,000 visitors per year. The Park serves as a memorial and commemorative site to local and national visitors throughout the year. There are a wide variety of facilities within the Manassas National Battlefield Park, including memorials; monuments; battlefields; as well as historic structures, sites and landscapes as shown in Figure 1-1 of this DEIS. The Park includes one driving tour commemorating the Second Battle of Manassas and a walking tour on Henry Hill for First Manassas and a series of interpretive trails that provide access to the historic resources. There is a visitor’s center, headquarters, and visitor picnic area. Also within the Park are some private in-holdings that are within the legislative boundary and privately owned land uses that are not within the boundary, but are surrounded by Park property.

Land uses within the Historic District are mixed, consisting of the Park itself, residential, churches, agricultural, forest, transportation, and possible cemeteries. The Park is bisected by Routes 29 and 234, a powerline easement, and other roadways are located within the boundaries of the Park and are of modern design and construction. Other modern development occurs within the Historic District and includes homes along Pageland Lane and in the neighborhoods of Sudley Springs, Sudley Mountain Estates, Sun Rise Hill Farm (which is an in-holding), Zouave Hills, and Bull Run Overlook. Within the Historic District, VDHR has identified a total of 29 contributing elements and 199 non-contributing elements.

Access. The primary access points to the Park are US Routes 29 and VA Route 234. In addition, some locations are accessible by Featherbed Lane, Groveton Road, Chinn Ridge Road, Vandor Lane and Pageland Lane and other park access roads. The main visitors center is located on Route 234 north of I-66. Routes 29 and 234 serve as the main access routes for the driving tours within the Park, which is why the existing congestion on these routes negatively affects Park visitation, historic preservation, and operations. Private owners access their land within the Park and the Historic District via the roads identified as well as via various private drives.

Relationship to Similarly Used Lands. Although there are other battleground sites in the region (i.e. Blackburn’s Ford, Bristoe Station, Buckland Mills, Thoroughfare Gap and Manassas Station), Manassas National Battlefield Park is the only one defined as a Class A battlefield as designated by the Civil War Sites Advisory

Commission. Class A battlefields are considered ‘Decisive’ and represent the most important battles of the Civil War. Manassas Station and Bristoe Station are considered Class B battlefields (direct influence on the outcome of the campaign); Blackburn’s Ford and Thoroughfare Gap are categorized as Class C battlefields (observable influence on the outcome of the campaign). Buckland Mills is considered a Class D battlefield (limited influence but achieving important local objectives). The closest similar facilities include the Fredericksburg battlefield (Class A) and perhaps, the Harpers Ferry in West Virginia (Class B battlefield).

Applicable Clauses Affecting Ownership. There is a conservation easement granted to the Virginia Outdoors Foundation on the Davis Tract within the Historic District, and a trail easement on Pageland Farm given to the Potomac Appalachian Trail Club in 1993 for purposes of establishing a trail linking the Park with Conway Robinson Memorial State Forest. This easement was for a hiking trail only. Other than these easements, there are no known clauses affecting ownership of the properties within the District or Park.

Unusual Characteristics. The Manassas National Battlefield Park has national significance as a facility within the National Park Service and as a commemorative site for the significant Civil War events that occurred within the Park boundaries. The Historic District has no unusual characteristics other than those that qualify it for eligibility for the NRHP.

8.4 IMPACTS TO SECTION 4(f) PROPERTIES

All five Candidate Build Alternatives would require use of land from parks and recreation areas and the Historic District, as shown in the previous figures. Each alternative also would have other environmental effects on Section 4(f) properties, such as changes in air quality, noise levels, and visual quality.

8.4.1 FCPA Site (formerly the Hunter Hacor Assemblage)

As shown in Figure 8-2, Alternatives A, B, C, and D would use acreage from the recently acquired FCPA site located just to the east of the Park, as all of the northern Alternatives would be located within the site just to the west of Bull Run Post Office Road. Although all of the acreage impacts are similar, Alternative C has the highest impact at 8.69 acres and Alternative D would have the least impact at 8.51 acres.

8.4.2 FCPA Site (located south of Fairfax National Estates Golf Course)

Alternatives C and D would require acreage from this FCPA site. Alternative C would require 11.84 acres and Alternative D would require 11.98 acres. Both of the Alternatives would be located along the northern edge of the park site. Since this land has been recently acquired by the FCPA, there are no existing facilities that would be affected by the alternatives.

8.4.3 Manassas National Battlefield Park and Historic District

All of the Candidate Build Alternative would require land from the Manassas National Battlefield Park and the associated Historic District, which was recently revised. Figure 8-4 illustrates the location of each alternative relative to the Park boundaries as they currently exist, the original NRHP district, and the recently amended Historic District. Alternatives A and B would require the least acreage from the Park and the Historic District. Both of these alternatives would require land from within the northeast quadrant of the Historic District that falls within the Park’s legislative boundary in Fairfax County, but this land is not currently owned by the Department of the Interior.

Alternatives A (11.24 acres) and B (11.18 acres) have similar impacts to Park-owned land as they are both located within Park boundaries east of Pageland Lane, as are all Build Alternatives. This 4(f) impact is allowed for in the Manassas National Battlefield Park Amendments of 1980, which stated that if VDOT determines that the Route 234 bypass “should be properly located between the Virginia Electric Power Company powerline easement and Route 705” then the land would be made available, subject to the conditions deemed “necessary and appropriate” by the Secretary of the Interior to ensure that the bypass is consistent with the administration of the Park. However, Alternative A requires more acreage within the Amended Historic District than Alternative B, since Alternative A is located along the western edge of the Historic District on Stony Ridge. Alternatives C and D would require additional acreage from within the Park in comparison to Alternatives A and B because they would require Park land from the Poplar Ford area in the northeast quadrant of the Park in addition to the land required along Pageland Lane. Alternative C requires more acreage within the Amended Historic District at 65.25 acres because it is located within the northeast quadrant of the Park and is located along the western edge of the District. Alternative G requires the largest acreage from within the Park itself at 42.30 acres but requires less land from the Historic District (58.68 acres) than Alternative C. Alternative G would be located within Park boundaries along the southern edge of the Park and would also include the section along Pageland Lane in order to allow for the relocation of Route 234. All Candidate Build Alternatives would require land from within the Park and associated Historic District, and all have some potential to impact an equestrian trail that is located to the east of Pageland Lane. All of the alternatives would allow for the closure of Routes 29 and 234 within the Park, which would suffer further degradation to Park experience and operations if the roads were to remain open.

8.5 AVOIDANCE ALTERNATIVES AND MEASURES TO MINIMIZE HARM

FHWA and NPS have investigated several alternatives that would avoid all Section 4(f) properties and each Section 4(f) property.

8.5.1 No Action Alternative

The No-Action Alternative would involve leaving Routes 29 and 234 open within the Park boundaries in their current configuration. This alternative would involve no new construction and therefore would avoid the direct use of any Section 4(f) properties. However, this alternative ignores the basic elements of Purpose and Need which are to study closure of both Routes 29 and 234 within the Park boundaries. Leaving the roads open would allow for the continuing degradation of the Park experience and interfere with the operations and historic interpretation of the significant events that occurred in the Park, which is a 4(f) resource. Thus, the No-Action alternative results in continuing 4(f) impacts to the Park as discussed in the Purpose and Need for this study. This alternative is not prudent.

8.5.2 Close Routes 29 and 234 Within Park

In this alternative, no new construction would be required so there would be no 4(f) impact. However, as discussed in Chapter 2 of this DEIS this alternative is inconsistent with the legislative directive that initiated this study, which specifically linked the road closure to the provision of an alternative method of transportation for those commuters now traveling through the Park on Routes 29 and 234. The closure of these routes without the provision of another alternative route would result in an increase in congestion on all routes located along the edges of the Park boundaries, reduce regional mobility, and provide no alternative means of transportation for the more than 28,000 daily vehicles that use Routes 29 and 234. The closure alone would also result in a

discontinuous Route 29, which is a major arterial that is part of the National Highway System. This alternative is not prudent and inconsistent with the basic Purpose and Need for this study.

8.5.3 Co-Location Alternatives

Several alternatives looked at closing Routes 29 and 234 from within the Park boundaries and potentially co-locating Routes 29 and 234 onto other existing routes, such as Interstate 66. Since no new roads would be constructed in this alternative, there would be no Section 4(f) resources affected. However, co-location alternatives resulted in traffic operations problems on I-66 due to the traffic diverted onto any co-located Route 29 segments. In addition, based on coordination with VDOT, the co-location alternative would require the addition of two more lanes on I-66. In order to accommodate these lanes and the improvements that are already planned for I-66, the right-of-way would expand to the point where land would be required from the Manassas National Battlefield Park and potentially Bull Run Regional Park located south of I-66. Thus, none of the co-location alternatives were found to be prudent, and all of them would still require uses of Section 4(f) lands and therefore would not represent true Section 4(f) avoidance alternatives.

8.5.4 Measures to Minimize Harm

Design alternatives have been considered to avoid Section 4(f) impacts to specific resources within the study area and to minimize the involvements where they do occur. Depending on the location of the Section 4(f) resource, these design alternatives include minor shifts of portions of alignments or the development of entirely new alignments that avoid the specific Section 4(f) resource. Measures to minimize harm include the consideration of special design treatments, such as retaining walls, landscaping, buffering, and noise barriers. The following sections describe the specific avoidance alternatives and minimization measures considered for each Section 4(f) involvement. In addition, it is anticipated that the 76.2 acres of land currently within the Routes 29 and 234 right-of-way would be transferred from Virginia to the National Park Service, thereby offsetting lesser takings elsewhere in The Park. These offset takings range from 11.2 to 40.3 acres resulting in a net gain of at least 30 acres.

FCPA Site (formerly the Hunter Hacor Assemblage)

The avoidance alternative for this site would be Alternative G, which would travel to the south from Route 29. However, as discussed below, Alternative G has the highest acreage impact to the Park itself. Since no planning has been completed for this park site and there are no existing park facilities, there are no known facility impacts due to any of the alternatives. As mentioned in the section 8.5.4 any avoidance alternative designed to the east of this specific Section 4(f) resource would impact other FCPA owned land or densely developed residential areas and any avoidance alternative to the west would further impact the Manassas National Battlefield Park. The design for the alternatives that impact this FCPA Site also considers a potential co-location with the proposed Tri-County Parkway if it is constructed to the east of the Battlefield Park. The location of the Tri-County Parkway, as shown in the comprehensive plan for Fairfax County, would also require land from this FCPA Site and Alternatives A-D were designed to co-locate with that facility so as to minimize impacts to environmental resources, including this Section 4(f) resource.

FCPA Site (located south of Fairfax National Estates Golf Course)

The avoidance alternatives for this Section 4(f) resource would be Alternatives A and B which are located to the north of the site and Alternative G which is located along the southern boundary of the Battlefield Park, another 4(f) resource. Alternatives A and B have much greater neighborhood and community impacts in Fairfax and Prince William County since they are physically located near the neighborhood of Fairfax National

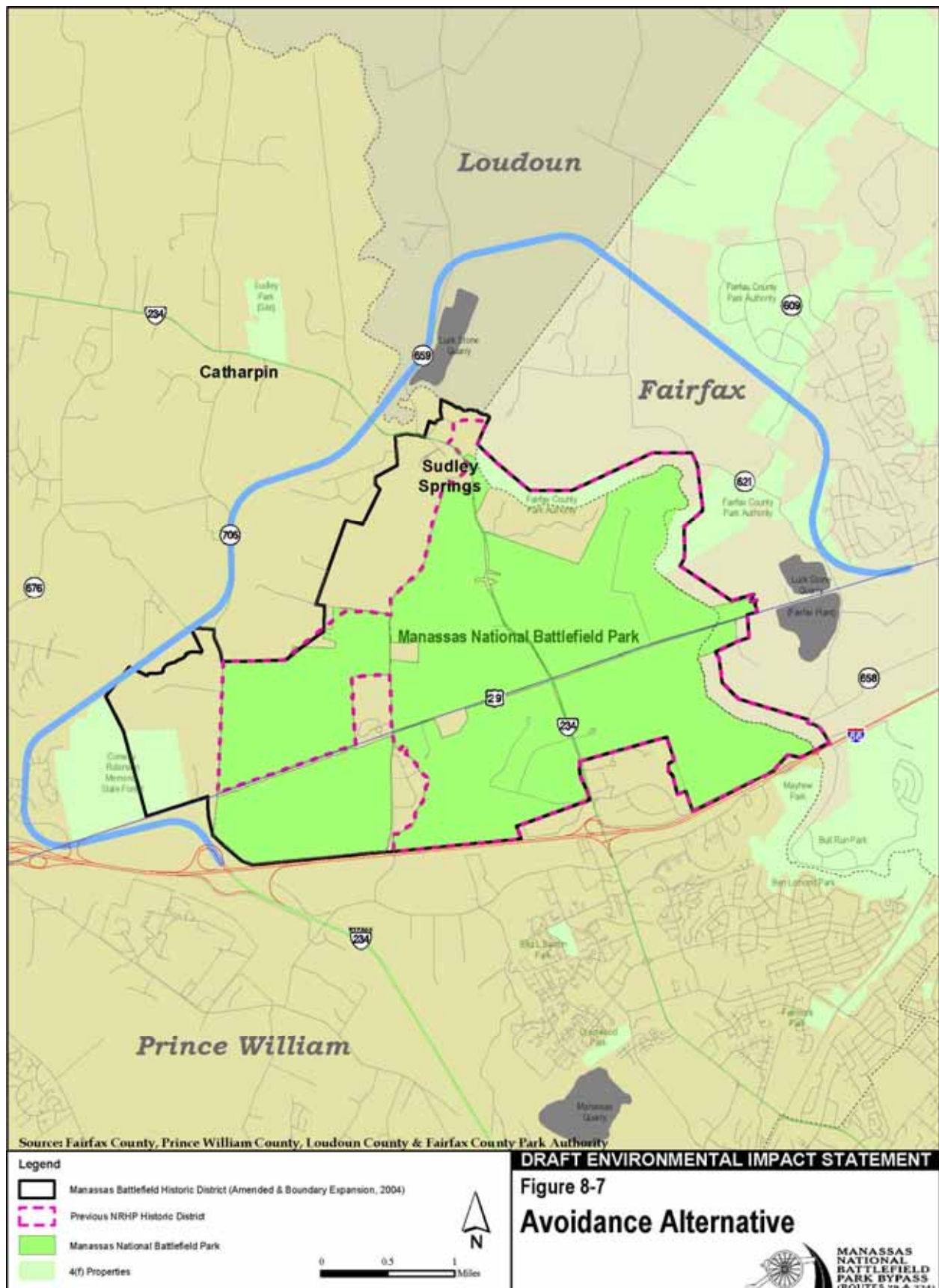
Estates and bisect the Bull Run Overlook neighborhood. Alternatives C and D, which would require land from this Section 4(f) resource were developed in consultation with Fairfax County so as to minimize residential impacts and private property impacts to the north of the Park. They have been designed to have minimal interaction with this resource and are located along the northern edge of the resource to the greatest extent possible.

Manassas National Battlefield Avoidance Alternative

As shown in **Figure 8-7**, this alternative would be entirely on new location and would avoid the Manassas National Battlefield Park and Historic District, as well as the FCPA sites located in proximity to the Park. However, to the east of the Park, FCPA does own land continuously from the Park boundary to an area well to the east of Route 609 and well to the north of the Park to the Loudon County border. This continuous segment of publicly owned parkland abuts densely developed residential communities along Route 609 and Route 29. In order to avoid all FCPA lands, all of the northern alternative would have to be located within densely developed residential areas and traverse such a long circumferential route that much greater environmental impacts and costs would occur. In order to avoid 4(f) resources to the west of the Park, including the Conway Robinson Memorial State Forest, an alignment within the densely developed neighborhood named Heritage Hunt would be required. Concepts were analyzed that avoided the Park entirely and would be located to the west of Pageland Lane, and all of the Build Alternatives could potentially be shifted to the west of Pageland Lane. A determination was made to locate this segment within the Park boundaries for several reasons. First, the Manassas National Battlefield Park Amendment Act of 1980 allowed for the Route 234 Bypass to be located to the east of Pageland Lane. The location proposed is consistent with that directive and is located in proximity to the existing powerline easement, which already creates a linear visual intrusion within the Park. Second, a location to the west of Pageland Lane would still be within the Historic District and would require land from two privately owned contributing resources, Pageland II and Honeywood. Third, a location to the west of Pageland Lane would impact numerous private residential properties since there are a number of narrow parcels that have access to Pageland Lane. Construction to the west would require additional land acquisition and the construction of numerous structures and access points either under or over the proposed limited access bypass to Pageland Lane or construction of a frontage road.

The Manassas National Battlefield Park Amendments of 1988 adopting this study directs FHWA and NPS to study alternatives within and in the vicinity of the Park itself and the circumferential routes needed to avoid all of the Section 4(f) resources would be inconsistent with this directive. Because of the size of the Manassas National Battlefield Park and Historic District, the high probability of locating additional cultural resources along the periphery of the Park, the configuration of publicly-owned parkland both north, south, east and west of the Park, and the clustering of residential development along the periphery of these 4(f) resources there are no feasible and prudent location alternatives that would avoid all Section 4(f) resources and meet the legislative requirements for this DEIS.

Since all of the Candidate Build Alternatives allow for the closure of Routes 29 and 234 from within the center of the Park, and such closures would enhance historic preservation and the Park experience for visitors, all of the alternatives would minimize harm to the Section 4(f) resource that is the Park and Historic District in comparison to the No-Action Alternative.



8.6 COORDINATION

The Northern Virginia Regional Park Authority, the Virginia State Historic Preservation Officer (SHPO), whose office is at Virginia Department of Historic Resources, Virginia Department of Recreation and Conservations, Prince William County, Fairfax County, and Fairfax County Park Authority were all part of the coordination process for this DEIS. The Fairfax County Park Authority was consulted regarding the potential impacts to the future parks within the study area and have requested to review the DEIS. The National Park Service is one of the lead agencies for this DEIS and has been fully involved in the development and evaluation of impacts to the Park and Historic District. The Virginia Department of Historic Resources has been included throughout the study as part of the agency coordination process and has also been coordinated with as part of the Section 106 process. VDHR was also consulted in identifying historic properties and archeological sites within the study area and Historic District.