



December 2, 2005

Mr. Robert Sutton
Manassas National Battlefield Park
12521 Lee Highway
Manassas, VA 20109

Re: Brawner Restoration EA

Dear Mr. Sutton

We are writing to register our objection to your plan to clearcut 140 acres of forest within Manassas National Battlefield Park. Although the Environmental Assessment states that “The entire study site consists of Virginia Pine-Eastern Red Cedar and Basic Oak-Hickory forest,” the assessment fails to recognize or consider that this type of forest is considered to be rare and of particular concern to Virginia’s Dept. of Conservation and Recreation, Division of Heritage Resources, because little remains not only in Virginia but worldwide.

Although never mentioned by the National Park Service’s Environmental Assessment for the proposed clearcut, the webpage for Manassas National Battlefield Park boasts about the “rare and significant habitats that occur” within the park and highlight the basic oak-hickory forest, saying this plant community is “very threatened elsewhere in Virginia due to development.” The Environmental Assessment does not address how clearcutting forestland that is of high conservation value would support Manassas National Battlefield Parks management goals, especially goals of “managing the Park’s habitats to help offset regional ecosystem deficiencies.”

According to the Environmental Assessment, the area proposed for clearcutting is home to six woodland birds named as “species of moderate concern” by the Audubon Society – Wood thrush, Red-headed woodpecker, Bay-breasted warbler, Work-eating warbler, Kentucky warbler and Canada warbler – and one “species of high concern” – the Cerulean warbler. However, according to the Environmental Assessment, the National Park Service believes comparable woodlands where affected species can relocate exist close to the proposed clearcut, both inside and outside of the park. No management plan has been included to verify the basis of these statements.

This major change to Manassas National Battlefield Park is proposed in order to “preserve the historic landscape containing historic sites, buildings, objects and views which contribute to the national significance to the First and Second Battles of Manassas, for the use, inspiration and benefit of the public.”

However, the Environmental Assessment states that, once the forest is removed, the area would be revegetated with a mix of shrub and grassland communities. The Environmental Assessment also acknowledges that none of these plant communities existed at the time of the battles but

makes no mention of active farming, which would recreate conditions more representative of the period.

Manassas National Battlefield Park preserves both natural and cultural resources that are nationally significant. The Environmental Assessment for the proposed clearcut of 140 acres of forestland does not fully consider the potential impacts to rare plant communities, wildlife, wetlands or water quality.

There is little discussion about needs to protect waterways and, while the Environmental Assessment acknowledges that the Park lies within the Occoquan River watershed, there is no mention that the area drains to a significant regional public water supply. In addition, the Park lies within Prince William County, a locality mandated to enforce Virginia's Chesapeake Bay regulations.

The Environmental Assessment includes little information on impacts to waterways, merely stating that "Best forestry management practices will be employed with a 50ft buffer around all streams." This standard falls below Virginia's Chesapeake Bay mandates and fails to support national goals to restore the Chesapeake Bay by 2010.

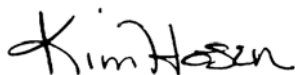
In addition, the only mention of wetlands is found in the list of references, which lists the *Classification and Mapping of Wetlands at Manassas National Battlefield Park, Virginia, Brawner Farm and Matthews Hill Tracts*, Natural Heritage Tech. Rep. 03-21. Virginia Department of Conservation and Recreation, Division of Natural Heritage, Richmond. Unpublished report submitted to the National Park Service. 8 pp. Prepared by D. T. Loomis and K. E. Heffernan. How was this information utilized to complete the Environmental Assessment.

Finally, the Environmental Assessment claims that "the woodlands obstruct historic lines of sight and corresponding fields of fire important to understanding the nature of the fighting..." Although these goals are laudable, efforts to increase interpretative activities would perhaps make a more meaningful contribution toward increasing public awareness and interest in the First and Second Battle of Manassas.

The Environmental Assessment does not recognize, consider or adequately address potential impacts to important resources, including rare plant communities, wildlife, waterways, wetlands and the Chesapeake Bay watershed. We urge the National Park Service to protect these valuable resources and select the 'no action' alternative.

Thank you for the opportunity to comment on the Environmental Assessment for the Brawner Farm-Deep Cut Vista Enhancement proposal.

Sincerely,

A handwritten signature in black ink that reads "Kim Hosen". The signature is written in a cursive, slightly slanted style.

Kim Hosen
Executive Director