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COMMONWEALTH of VIRGINIA

W. Tayloe Murphy, Jr.
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P. O. Box 10009, Richmond, Virginia 23240
Fax (804) 698-4500 TDD (804) 698-4021
www.deq.virginia.gov

Robert G. Burnley
Director

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

November 29, 2005

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

RE: Environmental Assessment on Brawner Farm-Deep Cut Vista
Enhancement
DEQ-05-276F

Dear Dr. Sutton:

The Commonwealth of Virginia has completed its review of the above-listed Environmental Assessment. The Department of Environmental Quality ("DEQ") is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act ("NEPA") and responding to appropriate federal officials on behalf of the Commonwealth. In addition, DEQ is the lead agency for review of federal consistency determinations prepared under the Coastal Zone Management Act (CZMA) and the Virginia Coastal Resources Management Program. The following state agencies and regional planning district commission joined in this review:

- Department of Environmental Quality (hereinafter "DEQ")
- Department of Game and Inland Fisheries
- Department of Agriculture and Consumer Services
- Department of Conservation and Recreation
- Marine Resources Commission
- Department of Forestry
- Northern Virginia Regional Commission.

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

Project Description

The National Park Service proposes (Alternative 3, the Preferred Alternative) to clear approximately 140 acres of timber between Brawner Farm and Deep Cut in Manassas National Battlefield Park, which is situated about 2.5 miles north of Manassas in Prince William County. According to the EA, the area in question was once open pastureland, where the First and Second Battles of Manassas took place on open ground in August 1862 (EA, pages 3-4). The Park Service would maintain the battlefield vistas resulting from the clearing through prescribed burns (if approved), hand-cutting, and maintenance of the area in shrubland (page 6, "Alternative 3" description). The EA considers a no-action alternative (Alternative 1) and an alternative involving clearing about 40 acres of trees to allow a view of the battlefield from firing positions (Alternative 2) (EA, pages 5-6).

Summary of Recommendations

Given the significance of the concerns indicated here with regard to the impacts of the Preferred Alternative, we recommend that the Park Service proceed with Alternative 2, following appropriate consultation, or that it undertake an Environmental Impact Statement if it intends to proceed with the Preferred Alternative.

Individual recommendations resulting from this review may be summarized as follows:

- 1) In view of the potential impacts of the Preferred Alternative (Alternative 3) upon the Basic Oak-Hickory Forest type which is globally uncommon to rare and limited to a six-county area in Northern Virginia and Maryland, and because Alternative 2 meets the requirements of the Chesapeake Bay Preservation Act, the Department of Conservation and Recreation recommends that the Park Service pursue Alternative 2, following appropriate consultation, or Alternative 1, "no action." See "Environmental Impacts and Mitigation," items 5(c), 6(c), and 6(e), below.
- 2) The Department of Game and Inland Fisheries recommends an assessment of the ability of the Park, with and without the proposed project, to support early successional nesting birds. See "Environmental Impacts and Mitigation," item 3(c)(i), below.
- 3) The Department of Game and Inland Fisheries recommends that the Park Service develop a grassland/shrubland management plan, in coordination

with the Department. The assessment recommended above would be a part of this management plan. See "Environmental Impacts and Mitigation," item 3(c)(i), below.

- 4) The Department of Agriculture and Consumer Services recommends an updated survey of plants in the Park. See "Environmental Impacts and Mitigation," item 4, below.
- 5) In the event either of the action alternatives is chosen, the Department of Game and Inland Fisheries recommends that time-of-year restrictions on vegetation removal be followed. Specifically, the removal should not take place between April and August in order to avoid bird nesting season. See "Environmental Impacts and Mitigation," item 3(c)(ii), below.
- 6) In the event either of the action alternatives is chosen, the Department of Game and Inland Fisheries recommends stream buffers of at least 100 feet in order to protect aquatic and riparian wildlife species. See "Environmental Impacts and Mitigation," items 3(c)(iv) and 6(c), below.
- 7) The Department of Game and Inland Fisheries recommends that any mowing or burning of grasslands take place in early spring, and not in late summer, in order to protect grassland birds' winter habitat. See "Environmental Impacts and Mitigation," item 3(c)(iii), below.
- 8) DEQ's Waste Division recommends reduction of wastes at the source, re-use of materials, and recycling of waste materials in all Park development and maintenance endeavors. See "Environmental Impacts and Mitigation," item 1(d), below.

The Document

Our first concern relates to coordination of this project effort with state agencies. We discovered the existence of the Environmental Assessment by way of contact from private parties, rather than from a notice in the Federal Register or direct contact from the Park Service. In the future, we recommend that the Park Service contact DEQ's Office of Environmental Impact Review at the start of any public comment period for an Environmental Assessment or Environmental Impact Statement.

The "Purpose and Need" for the project is said to arise from the Park's General Management Plan (EA, page 3, section I). DEQ did not have an opportunity to coordinate Virginia's review of the General Management Plan or

any environmental documentation related to it. Accordingly, there was no opportunity for coordinated state review of any of the proposals in the General Management Plan.

The EA did not provide effective mapping or analysis of the streams and wetlands within the Park or those which might be affected by the proposed action (see "Environmental Impacts and Mitigation," items 8 and 11, below). The hydrology description (pages 7-8, section III.A.c.) indicates that the streams are within the Occoquan River watershed (see "Environmental Impacts and Mitigation," item 11, below) but is otherwise very general. The color map ("Vista Clearing," following page 19) is helpful but not sufficiently informative as to the location, area, or significance of waterways and wetlands.

On the other hand, the historical discussion (pages 8-12, section III.A.d.) is longer than any other part of the analysis in the EA.

Environmental Impacts and Mitigation

1. *Solid and Hazardous Waste Management.* Neither solid waste issues and sites nor hazardous waste issues and sites were addressed in the EA. The EA did not contain a search of waste-related data bases.

(a) *Findings.* DEQ's Waste Division conducted a cursory review of its data files and determined that the Park is listed in EPA's RCRA Hazardous Waste Database as a conditionally exempt small-quantity generator of hazardous waste ("Manassas National Battlefield Park," EPA identification number VA8142300963).

(b) *Additional Information.* The following web site may be helpful in locating additional information for the above identification number:

- http://www.epa.gov/echo/search_by_permit.html.

(c) *Requirements governing Contamination.* Any sediment exposed or displaced during the proposed de-forestation operations (see EA, page 5) that is suspected of contamination, or hazardous or solid wastes that are generated, transported, disposed, stored, or treated (as defined in the Virginia Solid Waste Management Regulations or the Virginia Hazardous Waste Management Regulations) must be tested and disposed of in accordance with applicable federal, state, and local laws and regulations.

Some of the applicable state laws and regulations are:

- Virginia Waste Management Act (*Virginia Code* sections 10.1-1400 et seq.);
- Virginia Hazardous Waste Management Regulations (9 VAC 20-60);
- Virginia Solid Waste Management Regulations (9 VAC 20-80);
- Virginia Regulations for the Transportation of Hazardous Materials (9 VAC 20-110).

Some of the applicable federal laws and regulations are:

- Resource Conservation and Recovery Act (RCRA) (42 U.S.C. sections 6901 et seq.);
- U.S. Department of Transportation, Rules for Transportation of Hazardous Materials, 49 CFR Part 107.

(See the enclosed DEQ memo, Brockman to Ellis, dated November 9, 2005 for additional citations.)

(d) *Pollution Prevention.* DEQ encourages the Park Service to implement pollution prevention principles in all its undertakings at the Park. These principles include the reduction of wastes at the source, re-use of materials, and recycling of waste materials.

2. *Air Quality.* According to DEQ's Division of Air Program Coordination, the deforestation proposed in the EA may aggravate the ozone non-attainment status of the area in which the Park lies.

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

- Use, where possible, of water or chemicals for dust control;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Covering of open equipment for conveying materials; and
- Prompt removal of spilled or tracked dirt or other materials from paved streets and removal of dried sediments resulting from soil erosion.

(b) *Open Burning Requirements.* In addition, if project activities include the burning of any material, this activity must meet the requirements of the Regulations for open burning (9 VAC 5-40-5600 et seq.; see

9 VAC 5-40-5630.9), and it may require a permit (see "Regulatory and Coordination Needs," item 2, below). The Regulations provide for, but do not require, the local adoption of a model ordinance concerning open burning. The Park Service should contact appropriate Prince William County officials to determine what local requirements, if any, exist. The model ordinance includes, but is not limited to, the following provisions:

- All reasonable effort shall be made to minimize the amount of material burned, with the number and size of the debris piles;
- The material to be burned shall consist of brush, stumps and similar debris waste and clean-burning demolition material;
- The burning shall be at least 1000 feet from any occupied building unless the occupants have given prior permission, other than a building located on the property on which the burning is conducted;
- The burning shall be conducted at the greatest distance practicable from highways and air fields;
- The burning shall be attended at all times and conducted to ensure the best possible combustion with a minimum of smoke being produced;
- The burning shall not be allowed to smolder beyond the minimum period of time necessary for the destruction of the materials; and
- The burning shall be conducted only when the prevailing winds are away from any city, town or built-up area.

(c) *Fuel-burning Equipment.* Fuel-burning equipment used in deforestation and other activities may require an air pollution control permit from DEQ. See "Regulatory and Coordination Needs," item 2, below.

3. *Wildlife Resources.*

(a) *Agency Jurisdiction.* The Department of Game and Inland Fisheries, as the Commonwealth's wildlife and freshwater fish management agency, exercises enforcement and regulatory jurisdiction over wildlife and freshwater fish, including state or federally listed endangered or threatened species, but excluding listed insects. The Department (hereinafter "DGIF") is a consulting agency under the U.S. Fish and Wildlife Coordination Act (16 U.S.C. sections 661 et seq.), and provides environmental analysis of projects or permit applications coordinated through the Department of Environmental Quality and several other state and federal agencies. DGIF determines likely impacts upon fish and wildlife resources and habitat, and recommends appropriate measures to avoid, reduce, or compensate for those impacts.

(b) *Findings.* DGIF records do not indicate the presence of any endangered or threatened wildlife species subject to the Department's jurisdiction in the project area. However, the EA indicates that a pair of Hensley's sparrows (listed by the federal government as a species of concern, and by the state government as a threatened species) was observed in the project area during 2005 (EA, page 16). DGIF requests information regarding this occurrence; see "Regulatory and Coordination Needs," item 1, below.

(c) *Analysis and Recommendations.*

(i) *Habitat for Early Successional Nesting Birds.* According to the EA, a secondary goal of the project "is to establish and maintain a grass and shrubland habitat mix," particularly for early successional nesting birds (page 16). DGIF recommends a formal assessment to determine the ability of the Park, with and without the proposed project, to contribute to a viable population of such species. The assessment should be part of a grassland/shrubland management plan for the Park.

Species such as Hensley's sparrow require large fields (at least 100 acres) consisting of tall, dense grass, a well-developed litter layer, standing dead vegetation, and sparse or no woody vegetation. Shrubland species, such as brown thrashers, will use strips of appropriate habitat that is at least 30 feet wide. Alternatively, golden-winged warblers require blocks or circular patches of shrubland at least 25 acres in size. DGIF recommends additional coordination by the Park Service as this management plan is developed; see "Regulatory and Coordination Needs," item 1, below.

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

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

(iv) *Streamside Buffers.* The Department of Game and Inland Fisheries understands that 50-foot streamside buffers are proposed. To minimize potential adverse impact upon aquatic and riparian wildlife species, the Park Service should observe 100-foot buffers, according to the Department.

(d) *Additional Information.* DGIF maintains a data base of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters, that may contain information not covered by the discussion in item 5, below. The data base is available at the DGIF web site:

- http://www.dgif.virginia.gov/wildlife/info_map/index.html.

Questions on this web site may be directed to the Department (Shirl Dresser, telephone (804) 367-6913).

4. *Endangered and Threatened Plant Species.* According to the Department of Agriculture and Consumer Services (VDACS), federally listed and state-listed plant species are known to occur near the Manassas Battlefield National Park. A list of plants in the Park provided by the Park Service does not indicate a date for the most recent survey of the project area. An update of this survey may be warranted if it is more than two years old (Tignor/Ellis, 11/28/05). See "Regulatory and Coordination Needs," item 3, below.

5. *Natural Heritage Resources.* The Department of Conservation and Recreation has searched its Biotics Data System for occurrences of natural heritage resources in the project area. "Natural heritage resources" are defined as the habitat of rare, threatened, or endangered species of animals or plants, unique or exemplary natural communities, and significant geologic formations:

The Department of Conservation and Recreation (DCR) has conducted extensive biological and vegetation inventories at Manassas National Battlefield Park, and was responsible for the vegetation classification and map (Fleming and Weber, 2003) cited in the EA (page 18).

(a) *Earlier Inventories and Studies.* In 1997, as part of a general Natural Heritage inventory of the Park, DCR's Division of Natural Heritage (DCR-DNH) assessed the Brawner Farm-Deep Cut scenic restoration area and did not identify any significant resources at that time. In 2001-2002, DCR-DNH ecologists mapped portions of the area as Basic Oak-Hickory Forest, but the complete geographic distribution, extent, and significance of this forest community were not fully known.

In 2004, following extensive surveys and data collection in upland forests of the Mid-Atlantic region, DCR-DNH worked with NatureServe to formally classify the Basic Oak-History Forest type in the United States National Vegetation Classification (USNVC), a system which serves as the federal standard for all vegetation classification and mapping. As part of the process,

formal ranking protocols were applied to assess this forest's conservation status, both range-wide and in Virginia. The full classification and ranking report can be reviewed at this web link:

- http://www.natureserve.org/explorer/servlet/NatureServe/searchCommunityUId=ELEMENT_GLOBAL.2.738472.

(b) *Results of Studies and Classifications; Analysis.* In the USNVC, the forest in question is classified as the Northern Hardpan Basic Oak-Hickory Forest (citation and terminology in item 5(b)(i) below), and is ranked "G3," indicating its uncommon to rare global status (see attached rankings sheet, first enclosure). The known distribution of this type is limited to a six-county area in northern Virginia and adjacent Maryland. Moreover, the environmental conditions under which this type of forest occurs are naturally uncommon to rare in the mid-Atlantic region. Although this type of forest may form locally sizeable patches in the northern Virginia piedmont, many stands have been destroyed by suburban development, and virtually all stands have been affected by timber removal and other anthropomorphic disturbances. In addition, the recent expansion of large-scale development into formerly rural areas of Loudoun, Prince William, and Fauquier Counties has accelerated the rate of destruction or fragmentation of this type of forest community. Such impacts make it even more important for national and local parks to act as stewards for what remains.

(i) *Citation and Terminology.* The citation and terminology for the Northern Hardpan Basic Oak-Hickory Forest is CEGLO06216 – *Quercus alba* – *Carya glabra* – *Fraxinus Americana* / *cercis Canadensis* / *Muhlenbergia sobolifera* – *Elymus hystrix* Forest.

(c) *Recommendations on Alternatives.* Based on the foregoing information, DCR-DNH recommends against the Preferred Alternative (Alternative 3), which would result in clear-cutting of the entire 140 acres containing a mosaic of the Basic Oak-Hickory Forest and Virginia Pine-Eastern Red Cedar Forest. The potential benefits of this alternative, allowing for historic interpretation, are outweighed by the damage to important ecosystems, the general need to conserve forest lands in northern Virginia, and the fact that additional acreage of this rare forest community was destroyed when a power line was relocated during the "scene restoration" of the Stuarts Hill area in the late 1990s.

It may be possible to implement Alternative 2 (a sight corridor) without affecting the Basic Oak-Hickory Forest, by careful clearing in the Virginia Pine-Eastern Red Cedar stands, which are not of conservation concern. DCR-DNH

would welcome the opportunity to work with the Park Service to study this alternative. Otherwise, DCR-DNH recommends Alternative 1 (no action).

6. *Chesapeake Bay Preservation Areas*. The Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance has reviewed the project from the standpoint of implementing requirements of the Chesapeake Bay Preservation Act (*Virginia Code* sections 10.1-2100 et seq.) and the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.).

(a) *Designation and Components*. Prince William County has designated its entire locality a Chesapeake Bay Preservation Area. Chesapeake Bay Preservation Areas are comprised of Resource Protection Areas (RPAs) and Resource Management Areas (RMAs).

(b) *Requirements Common to RMAs and RPAs*. All land-disturbing activity must adhere to the general performance criteria, especially with respect to the Erosion and Sediment Control Law (*Virginia Code* sections 10.1-560 et seq.) and the stormwater management criteria consistent with water quality protection provisions (4 VAC 3-20-71 et seq.) of the Virginia Stormwater Management Regulations (4 VAC 3-20 et seq.). The general performance criteria appear in the Chesapeake Bay Preservation Area Designation and Management Regulations (9 VAC 10-20-10 et seq.; see 9 VAC 10-20-120). These include:

- Minimizing land disturbance;
- Preserving indigenous vegetation; and
- Minimizing impervious surfaces.

(c) *Resource Protection Areas (RPAs)*. RPAs include tidal shores, tidal wetlands, non-tidal wetlands connected by surface flow and contiguous to tidal wetlands or water bodies with perennial flow, and a 100-foot buffer located landward of these features. RPAs are subject to the general performance criteria found in 9 VAC 10-20-120 (above) as well as the more stringent criteria found in 9 VAC 10-20-130.

(d) *Resource Management Areas (RMAs)*. RMAs include land types that, if improperly used or developed, have a potential for causing significant water quality degradation, or for diminishing the functional value of the RPA. RMAs are subject to the general performance criteria (9 VAC 10-20-120, above).

(e) *Recommended Alternative.* The Department of Conservation and Recreation's Division of Chesapeake Bay Local Assistance recommends Alternative 2, because it would meet the requirements of the Chesapeake Bay Preservation Act (*Virginia Code* sections 10.1-2100 *et seq.*) and the Chesapeake Bay Preservation Area Designation and Management Regulations by minimizing land disturbance and preserving indigenous vegetation in the RPA (which includes a 100-foot buffer).

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

8. *Wetlands and Water Quality.* As indicated above (see preceding item), the EA indicates that streams flow within the project boundaries, but it is unclear whether wetlands are also present.

(a) *Wetland Delineation Recommended.* DEQ's Northern Virginia Regional Office recommends that the Park Service conduct a wetlands delineation of the proposed project area to determine whether wetlands and streams are present, and the extent of each. The delineation should be confirmed by the Army Corps of Engineers (see "Regulatory and Coordination Needs," item 5(a), below).

(b) *Water Resources Permit Applicability.* If wetlands and/or streams would be affected by the proposed project, then a Virginia Water Protection Permit will be required (see "Regulatory and Coordination Needs," item 5(b), below). In addition, the Corps of Engineers and other permitting authority may apply; see "Regulatory and Coordination Needs, items 4 and 5(b), below.

9. *Forests.* According to the Department of Forestry, this project will not significantly affect the forests of the Commonwealth.

10. *Historic Structures and Archaeological Resources.* According to the EA, no archaeological survey has been conducted for the affected area. However, the Park Service promises assessment and monitoring of sensitive areas before implementation in order to minimize potential damage as the project proceeds. Consultation with the Department of Historic Resources (State Historic Preservation Office) is also promised (page 14, section IV.A.). See "Regulatory and Coordination Needs," item 6, below.

11. *Local and Regional Concerns.* The Northern Virginia Regional Commission emphasizes that the proposed project is within the Occoquan River

watershed. The Occoquan Reservoir, in combination with the Potomac River, supplies drinking water for 1.2 million people in Northern Virginia.

Several tributary streams are found along both the western and eastern cut areas of the proposed project. The EA lacks documentation regarding the presence, characterization, and protection of any wetland areas on the site. In addition, more detailed stream data are needed to allow a more effective assessment of the impact of the proposed timbering operation.

Regulatory and Coordination Needs

1. *Wildlife Resources.* We recommend that the Park Service contact the Department of Game and Inland Fisheries with information concerning the reported sighting of a pair of Hensley's sparrows in the past year (see "Environmental Impacts and Mitigation," item 3(b), above). The information should include:

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

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

Similarly, DGIF requests that the Park Service coordinate efforts with the staff listed above relative to development of a management plan for grassland and shrubland in the Park (see "Environmental Impacts and Mitigation," item 3(c)(i), above).

2. *Air Quality Regulation.* The project description does not appear to contemplate open burning (EA, pages 4-5), but the Park Service should be aware that open burning may require a permit from DEQ. In addition, one or more types of air pollution control permits may apply to fuel-burning equipment used in the proposed undertaking (Alternative 3) or in Alternative 2. Questions on air pollution control permit applicability, procedures, and/or forms may be directed to DEQ's Northern Virginia Regional Office (Mr. Terry Darton, telephone (703) 583-3845).

3. *Endangered and Threatened Plant Survey.* A determination of project impacts upon endangered or threatened plants in the Park depends on an up-to-date listing of the plants to be found in the Park. Accordingly, if the list of plants within the Park is more than two years old, the Park Service should contact the Department of Agriculture and Consumer Services (Keith Tignor, telephone (804) 786-3515) to discuss updating the plant survey for the project area.

4. *Subaqueous Lands Encroachment.* The Marine Resources Commission has jurisdiction over any encroachments in, on, or over state-owned rivers, streams, or creeks. Accordingly, if any part of the project involves any encroachments channelward of ordinary high water along natural rivers and streams, a permit may be required from the Commission (Ben McGinnis, telephone (757) 247-2200).

5. *Wetland Delineation and Water Quality Regulation.*

(a) *Delineation.* The wetland delineation report recommended above (see "Environmental Impacts and Mitigation," item 8(a)) should be submitted to the Army Corps of Engineers, Norfolk District (Regulatory Branch, 803 Front Street, Norfolk, Virginia 23510) for confirmation through a Jurisdictional Determination. The Park Service may also inquire whether the activity would qualify for a Nationwide Permit. Questions should be addressed to the Corps (Bob Hume, Regulatory Branch, telephone (757) 201-7657).

(b) *Virginia Water Protection Permit.* If the project would affect streams or wetlands, it may require a Virginia Water Protection Permit from DEQ's Northern Virginia Regional Office. Questions on permit applicability, processing, and forms may be directed to that Office (John Bowden, telephone (703) 583-3880).

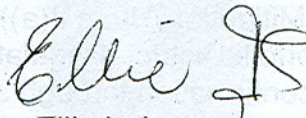
6. *Archaeological Resources and Historic Structures.* Prior to implementation of the project, the Park Service should consult with the Department of Historic Resources (Roger Kirchen, telephone (804) 367-2323, extension 153) to ensure compliance with the National Historic Preservation Act and its Section 106 review process.

7. *Federal Consistency under the Coastal Zone Management Act.* Pursuant to the Coastal Zone Management Act of 1972, as amended, the National Park Service is required to determine the consistency of its activities affecting Virginia's coastal resources or coastal uses with the federally approved Virginia Coastal Resources Management Program (VCP) (see section 307(c)(1) of the Act and the Federal Consistency Regulations at 15 CFR Part 930, sub-part C, section 930.34). This involves an analysis of the activities in light of the

Enforceable Policies of the VCP (first enclosure), and submission of a consistency determination reflecting that analysis and committing the Park Service to comply with the Enforceable Policies. In addition, we invite your attention to the Advisory Policies of the VCP (second enclosure). The federal consistency determination may be provided as part of the documentation concluding the NEPA process, or independently, depending on your agency's preference; however, we recommend combined submission, to save review time for both the Commonwealth and the Park Service. Section 930.39 gives content requirements for the consistency determination; section 930.41(a) allows 60 days for state review. If you need clarification of these comments, please contact Charles Ellis at (804) 698-4488.

Thank you for the opportunity to review this project. If you have questions, please feel free to call me (telephone (804) 698-4325) or Charles Ellis of this Office (telephone (804) 698-4488).

Sincerely,



Ellie L. Irons
Program Manager
Office of Environmental Impact Review

Enclosures

cc: Andrew K. Zadnik, DGIF
Scott Bedwell, DCR
Keith R. Tignor, VDACS
Allen R. Brockman, DEQ-Waste
Kotur S. Narasimhan, DEQ-Air
John D. Bowden, DEQ-NVRO
Ben McGinnis, MRC
Roger W. Kirchen, DHR
J. Michael Foreman, DOF
Alice R. T. Baird, DCR-DCBLA
Katherine K. Mull, NVRC
Craig S. Gerhart, Prince William County
J. Robert Hume, USACOE