



October 26, 2005

VIA FEDERAL EXPRESS

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

Re: Comments on Environmental Assessment for
Brawner Farm-Deep Cut Vista Enhancement
Via the Destruction of a Rare Plant Community
Manassas National Battlefield Park

Dear Mr. Sutton:

As an environmental consultant with sixteen years experience in dealing with wetlands, water resources and threatened and endangered species issues and as a birder who regularly visits Manassas National Battlefield Park to enjoy the natural resources of the Park, I am writing to you to strongly object to your proposal to clear-cut 140 acres of forest within the Park. The Environmental Assessment (EA), as written does not adequately address potential impacts to many natural resources, including rare plant communities, wetlands, and water quality. Additionally, the EA's attempt to justify the destruction of the existing forest by providing potential habitat for rare and declining bird species is flawed.

Section III.B. of the EA states, "The entire study site consists of Virginia Pine-Eastern Red Cedar and Basic Oak-Hickory forest." However, the EA fails to acknowledge that the basic oak-hickory forest community, as described in the EA, is a plant community that is considered rare and of conservation concern to the Virginia Department of Conservation and Recreation (DCR), Division of Natural Heritage. According to DCR's community description, this community type has a distribution limited to a six-county area in northern Virginia and adjacent Maryland. While rare plant communities have no legal protection under Federal or state statutes, local county governments, during the review of rezoning applications, require through proffer agreements that developers avoid impacts to these rare communities based on comments from DCR. At the very least, this EA should acknowledge that a portion of the forest proposed to be clear-cut is a forest type that is globally rare and contributes to the biodiversity of the region and the Commonwealth, and the EA should state the acreage of this rare forest community type that will be lost.

The EA correctly states that grassland bird species are among the bird species experiencing the greatest rates of population declines in Virginia and across the nation. The EA is flawed, however, in its assertion that conversion of the existing forest to a mix of shrub and grassland habitat will lead to additional habitats for rare and declining grassland bird species. The grassland bird species experiencing the fastest rates of

declines (*i.e.*, eastern meadowlark, grasshopper sparrow, upland sandpiper, and Henslow's sparrow) require extensive, uninterrupted open field habitats for successful nesting, and the presence of shrub-dominated successional habitats within the fields reduces the habitat's ability to support self-sustaining populations of these species.

The EA states that a "pair" of the state-threatened Henslow's sparrow was observed within the Park in 2005. However, the EA does not provide any documentation of this observation, including the season in which the sparrows were observed or any

maintain the area in a mix of shrub and grassland communities. As stated in the EA, these plant communities did not exist on the site at the time of the battles. Although removal of the woodland would open up sightlines in the vicinity of the historic battles, will the visitor truly be able to gain an understanding of the military strategies if unused grassland is present rather than the actively maintained farmland that was present at the time of the battle? And, is the removal of a rare plant community for the purpose of "restoring" historic sightlines justified when the sightlines proposed do not truly reflect the views that would have been present at the time of the battle? "Historically", these areas were forested; only during the post-colonial time period were they cleared, and it is misleading to characterize the forests as "non-historic", as stated on the first page of the EA. If your goal, however, is to provide the sightlines found during the Civil War, the area must be maintained as an active farm representative of the period, not as a grassland, as you propose.

The EA lists three alternatives for the proposed project (Alternative 1: No Action, Alternative 2: Cut a corridor to provide a line of sight, and Alternative 3: Cut existing trees and maintain a grass and shrub land mix). However, the EA only addresses the impacts associated with one of the three alternatives, and only impacts to cultural resources and wildlife are addressed in any detail. Potential impacts to other resources, most notably wetlands, streams, and water quality, are not addressed at all.

Figure B, the one and only map showing the location of any natural resources within the study area, shows the location of streams, but no wetlands are shown on the map. As an environmental scientist with a local wetlands and water resources consulting firm, I have 16 years of experience delineating wetlands and other waters of the U.S. and performing environmental impact assessments throughout the Mid-Atlantic region and in New England. In my experience, I have found that it is not possible to find a 140-acre tract of land in Northern Virginia with the number of streams present within the project area, but no other wetlands. The natural resources mapping included in the EA should show the location of wetlands as well as streams within the project area, and the impacts section of the EA should address the mitigation measures that will be taken during the land clearing activities to avoid and minimize impacts to the aquatic environment. How will trees be cut in forested wetlands to prevent erosion and sedimentation and water quality impacts to other wetlands and streams located downstream of the project site?

The only discussion of potential impacts to water resources occurs on Page 5 of the EA, which states, "Best forestry management practices will be employed with a 50ft

buffer around all streams." Further explanation of this should be provided. Does this statement mean that trees will not be cut within 50 feet of a stream? If so, how will the remaining wooded riparian corridors affect the proposed sightlines? And, can the stated goals of the proposed project truly be met if the trees are left uncut in these areas? Furthermore, Prince William County's Chesapeake Bay Preservation Ordinance requires Resource Protection Area buffer that extends 100 feet landward of all perennial streams ~~and wetlands that are contiguous and connected by surface flow to perennial streams for~~

have the potential to affect natural resources such as wetlands, water quality, and the Chesapeake Bay ecosystem.

In summary, the Environmental Assessment for the Brawner Farm-Deep Cut Vista Enhancement does not adequately address potential impacts to rare plant communities, wildlife, wetlands, and water quality. I urge that the National Park Service coordinate further with local, state, and Federal regulatory review agencies; revise your recommendation for a preferred alternative; and pursue the No Action Alternative in order to save the rare plant community prior to issuing a Finding of No Significant Impact (FONSI) and undertaking the proposed activity.

Thank you for the opportunity to comment on the proposed project.

Sincerely,



Craig E. Tumer, PWS, PWD
Principal Environmental Scientist

cc: Congressman Tom Davis
Congressman Frank Wolf
Mr. Tayloe Murphy, Secretary of Natural Resources
Mr. Robert Burnley, DEQ
Ms. Ellen Gilinsky, DEQ
Ms. Catherine Harold, DEQ
Mr. Jeff Steers, DEQ
Ms. Joan Crowther, DEQ
Mr. Joseph Maroon, DCR
Ms. Rene Hypes, DCR
Mr. Andrew Zadnik, DGIF
Mr. Pete Stokely, USEPA
Ms. Kim Marbain, USFWS