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Bureau of Land Management

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## Multipurpose Pavilion Utilities and Parking Lot

Environmental Assessment

DOI-BLM-Eastern States-M000-2022-0012-EA



Bureau of Land Management  
Northeastern States District Office  
Lower Potomac Field Station  
10406 Gunston Road  
Lorton, Virginia 22079

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## **CHAPTER 1. INTRODUCTION**

### **1.1. Introduction**

The Bureau of Land Management (BLM) proposes to pave the parking lot, add electrical and water utility services in the area designated for the multipurpose pavilion, and relocate the pollinator garden currently located at the Mustang Loop within the Lower Potomac Field Station (LPFS), Meadowood Special Recreation Management Area (SRMA) in Lorton, Virginia. This environmental assessment (EA) will discuss the impacts of adding these improvements and services.

### **1.2. Background**

The Meadowood SRMA is 804 acres of public land and serves as a recreational facility open to the public seven days a week from dawn until dusk. Located 2.5 miles southeast of downtown Lorton, Virginia and 17.5 miles southwest of downtown Washington D.C, the Meadowood SRMA serves as a rustic getaway spot for urban inhabitants. There are 13.4 miles of hiking trails, seven miles of horseback riding trails, and 6.6 miles of mountain biking trails. Between 2020 and 2022, the average annual visitor usage was roughly 47,000 visits. Five trailheads exist within the Meadowood SRMA; every trail starts from a parking lot (see map 1 in Appendix B), including the Mustang Loop parking lot. In the middle of the gravel Mustang Loop parking lot, a pollinator garden was constructed in 2010 by local volunteers.

The construction of a multipurpose pavilion, the expansion and maintenance of the Mustang Loop parking lot with #21A gravel, and the installation of a double vault toilet was approved by the Decision of the District Manager on July 30, 2021, following public comment in June 2021 and the final EA in July 2021. The pavilion was built in June 2022; other approved amenities are still to be constructed. The purpose of the pavilion is to provide a covered structure during Wild Horse & Burro (WH&B) adoption events, outdoor environmental education events, and other activities conducted under Special Recreation Permits. The ongoing maintenance of a #21A gravel parking lot is labor-intensive and time consuming. The parking lot is maintained an estimated two times per year with new #21A gravel, yet it is still considered a safety and nuisance issue for the public and employees of the LPFS due to ponding, rutting, and not meeting the standards of the Architectural Barriers Act of 1968 (ABA) and the Americans with Disability Act of 1990 (ADA). In addition, electrical and water utilities have been identified as services needed to support events held at the multipurpose pavilion. With the addition of electrical utility, security lighting would be installed at the multipurpose pavilion, consistent with the 2021 Pavilion EA and Decision. The location of the pollinator garden in the middle of the Mustang Loop parking lot is considered a safety issue for visitors and is proposed to be relocated to a safer and more suitable location. Relocating the pollinator garden would benefit the pollinators by reducing conflict with vehicles.

### **1.3. Purpose and Need**

The need for BLM action is to address maintenance and safety issues with the parking lot, install utility services to support events at the multipurpose pavilion, and continue to provide a pollinator garden for recreational and environmental education events without conflict from vehicle traffic.

The purpose of BLM action is to provide a safe, low maintenance parking area that would be ABA and ADA compliant, install necessary utilities to support planned activities and events at the multipurpose pavilion, and relocate the pollinator garden.

1.3.1. Decision to be Made

The BLM would decide whether to approve paving the parking lot, installation of electrical and water utilities, and relocating the pollinator garden.

**1.4. Scoping and Issues**

The BLM uses a scoping process to identify potential significant issues in preparation for impact analysis. The principal goals of scoping are to identify issues, concerns, and potential impacts that require detailed analysis. Internal scoping was initiated when the project was presented to the Northeastern States District Office (NSDO) interdisciplinary team on March 15, 2022.

The interdisciplinary team (IDT) consisted of a Planning and Environmental Coordinator, Planning and Environmental Specialist, Archaeologist, Natural Resource Specialists, LPFS Field Manager and staff, and an Engineer. The interdisciplinary team used various sources of information to prepare the EA, including existing data inventories, online resources, comments and feedback generated in prior community outreach, and information collected onsite. Documentation of the physical site characteristics and site conditions relied on aerial imagery, project design maps, and specifications provided by a site visit performed by BLM staff. No major issues of concern were identified during internal scoping or the site visit. The IDT identified one issue to be analyzed in detail in Chapter 3 (see Table 1).

**Table 1. Issues Analyzed in Detail.**

RESOURCE AND ISSUE #	ISSUE STATEMENT
Recreation - Issue 1	How would paving the parking lot, installing electrical and water utilities at the multipurpose pavilion, and relocating the pollinator garden impact use of the Mustang Loop area?

During the external scoping period of the Multipurpose Pavilion at Meadowood Special Recreation Management Area Environmental Assessment (DOI-BLM-Eastern States-0030-2019-0012-EA) (Pavilion EA) (BLM, 2021), public comments suggested the idea of relocating the pollinator garden. Commenters expressed concern the enlargement of the parking lot would increase temperatures within the pollinator garden, which would dry the soil, and the crushed stone would impact the garden due to vehicle movement. Comments were also provided regarding the installation of electrical and water utilities at the pavilion and the location and expansion of the parking area.

This project was posted on the BLM’s online National Environmental Policy Act (NEPA) Register (ePlanning) on August 16, 2022. The draft EA was posted on ePlanning for public comment beginning February 21, 2023; the comment period closed on Monday, April 10, 2023.

A virtual informational meeting was held on March 7, 2023. This EA was updated following the public comment period.

## **CHAPTER 2. ALTERNATIVES**

This chapter describes the alternatives that will be analyzed in Chapter 3 in response to the purpose and need for the project.

### **2.1. Alternative A – No Action Alternative**

Under the No Action alternative, the BLM would construct and maintain the Mustang Loop parking lot without gates and it would remain as #21A gravel as described in Section 2.2.2 of the Pavilion EA (page 8). The parking area would total up to 2.1 acres in size and would be surfaced with #21A stone and stone dust (i.e., compacted gravel surface). The parking area would be maintained once a year or more frequently depending on drainage patterns and presence of potholes. Maintenance includes resurfacing with #21A stone and stone dust and grading the surface to smooth ruts. Parking spaces would not be well defined with paint on #21A gravel, which would cause additional maintenance and would not meet the Architectural Barriers Act (ABA, U.S. Access Board, 2022b) and Americans with Disabilities Act standards (ADA, U.S. Access Board, 2022a). The BLM would not install electric or water utilities. The BLM would continue to transport water in tanks and use a generator to power any temporary uses. The existing 0.1-acre pollinator garden in the Mustang Loop would remain intact in the center of the compacted gravel parking lot continuing to be a safety issue for visitors and a disruption to pollinators.

### **2.2. Alternative B – Proposed Action**

The Proposed Action would allow the BLM to pave the Mustang Loop parking lot with asphalt. Paving would occur within the area already analyzed for the parking lot expansion in Section 2.2.2 of the Pavilion EA (page 8). The parking area would total up to 2.1 acres in size (see Map 2 in Appendix B). The BLM would work with the local energy company and Fairfax County, Virginia to connect electrical and water utilities to the multipurpose pavilion. The existing pollinator garden within the Mustang Loop parking lot would be relocated outside the parking lot, but still within the Mustang Loop area in a location suitable and accessible to continue recreation and environmental education use. The pollinator garden would be relocated before construction of the parking lot begins. After relocating the pollinator garden, it would be at least equivalent in size, or larger, to the existing 0.1-acre pollinator garden.

#### **2.2.1. Design Features**

The BLM would utilize a contractor to design a parking area that adopts Fairfax County Best Management Practices (BMPs) to meet state and county stormwater management requirements (Fairfax County, Virginia – Code of Ordinances, 2023). Examples of these BMPs include dry and wet swales, grass channels, sheet flow to open space, rain gardens, and other features. As part of the design, the BLM would assess the viability of combining BMPs into the relocated pollinator garden.

The parking lot would be paved with asphalt in compliance with the Architectural Barriers Act (U.S. Access Board, 2022b), the Americans with Disabilities Act of 1990 (U.S. Access Board,

2022a), and the Clean Water Act. Design features would include ramps to provide accessibility to the multipurpose pavilion and vault toilet. Lines would be painted for parking spaces. Handicap accessible symbols would be painted in the appropriate parking spaces to reserve approximately one to three handicap accessible parking spaces.

Electrical utilities would either be connected above ground or trenched below ground from an existing pole along Gunston Road to a corner of the multipurpose pavilion. Security lighting would be connected to the electrical utility. Electrical outlets installed for BLM use during events would be controlled by a key-locked electrical box. Security lighting via solar panels was approved by Decision of the District Manager on July 30, 2021. The use of electrical utilities to power security lighting is more practicable and reliable. This EA updates what was previously approved. The security lighting would be positioned down (rather than toward the sky), be motion activated, and have orange-colored lights to minimize light pollution, consistent with the 2021 decision. Water utilities would be connected from a main water line along Gunston Road to key-locked spigots at the multipurpose pavilion. Trenching for water utilities would occur within BLM land from Gunston Road to the multipurpose pavilion. The trench would be placed six inches below the frost line and electrical would be placed according to the local utilities' specifications. The BLM could consider installing a fire hydrant.

The existing pollinator garden would be relocated out of the Mustang Loop parking lot but would remain in the Mustang Loop area to maximize its use for recreation and environmental education. The relocation site would provide a setting less affected by vehicular traffic and safer for both the public and pollinators. Native plants would be cultivated in the garden as appropriate for the location's soil type, retention of water, and exposure to sunlight. Plant species would be selected to achieve a diverse, resilient, and robust native plant community to attract and support pollinator species that is also less dependent on active management of the garden. Measures would be taken to transplant or replant the current garden's native plant species to the new location as appropriate. Invasive plant and noxious weed management would occur routinely with special focus on seasonal transitions. If possible and appropriate, the pollinator garden could be included or incorporated into stormwater management BMPs. Interpretative signs would be relocated as needed.

### **2.3. Alternatives Considered but Eliminated from Detailed Analysis**

The BLM considered relocating the pollinator garden to the Hidden Pond area. This alternative was eliminated from detailed analysis after consideration of public comments and concerns, which asserted that Hidden Pond is too inaccessible. The BLM could consider a pollinator garden at Hidden Pond separately. The pollinator garden relocated to the Mustang Loop area would meet the purpose and need to provide a safe, fully accessible area for all visitors for recreational and environmental education events without conflict from vehicle traffic.

In the process of analyzing potential impacts from paving the Mustang Loop parking lot, the BLM considered other paving approaches and materials, including permeable pavement and permeable interlocking concrete pavers, to address potential stormwater runoff issues. A permeable parking surface would require labor-intensive installation of specialized materials. It would require the excavation of the site and installation of infrastructure or base rock to allow water to run into additional stormwater management features or percolate into a subsurface soil base suitable for that purpose (Virginia DEQ, 2011). Permeable paving further requires regular

maintenance. Additionally, compacted gravel, the current service, is an impermeable surface as defined by the state of Virginia (Virginia’s Legislative Information System, 2022) and Fairfax County (Fairfax County, Virginia – Code of Ordinances, 2023). For all these reasons, this potential alternative did not meet the purpose and need of the project. The BLM did not identify any stormwater management issues with asphalt. The BLM would ensure state and county stormwater management requirements are met using Fairfax County Stormwater BMPs in a practical manner as needed and appropriate through a designed parking site.

## **2.4. Conformance**

The Proposed Action complies with the following Land Use Plans:

- Meadowood Farm Planning Analysis (BLM, 2003)  
“Visitor safety is a top priority at Meadowood SRMA management will follow standard safety practices found in BLM Manual 1112 and associated handbooks” (page 8).  
“Facilities at Meadowood Farm will be brought into compliance with the Americans with Disabilities Act of 1990” (page 38).
- Meadowood SRMA Integrated Activity Management Plan/Environmental Assessment (IAMP/EA) (BLM, 2004)  
“Parking for adoptions may be located on open ground near the corrals, or off of Harley Road. Access will be monitored and controlled at all times to ensure animal and visitor safety” (page 21).

The Proposed Action complies with applicable laws, regulations, and policies, including, but not limited to, the following:

- National Environmental Policy Act of 1969, as amended
- Federal Land and Management Policy Act of 1976, as amended
- Architectural Barriers Act of 1968
- Americans with Disabilities Act of 1990
- Clean Water Act

## **CHAPTER 3. AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS**

This chapter defines the scope of analysis of the existing conditions relevant to the resource issue presented in Table 1 and discloses the direct, indirect, and cumulative environmental effects that may result from the No Action or Proposed Action alternatives.

### **3.1. Issue 1: How would paving the parking lot, installing electrical and water utilities at the multipurpose pavilion, and relocating the pollinator garden impact use of the Mustang Loop area?**

#### 3.1.1. Affected Environment

The Mustang Loop area is approximately 2.5 acres that extends from the west side of Harley Road and south of Gunston Road to the northeast corner of the multipurpose pavilion to the Mustang Loop Trailhead (see Map 2 in Appendix B). The existing parking lot is constructed with #21A gravel. The Mustang Loop area has been available for visitors to park and gain access to the Mustang Loop Trailhead for activities such as hiking, running, mountain biking, horseback riding, wildlife viewing, fishing, nature photography, geocaching, visiting the pollinator garden, and more. When the pollinator garden was created, it brought volunteers to tend to the garden and visitors to enjoy it. The Mustang Loop area has the space and capacity for other uses, events, and activities at the newly constructed pavilion.

#### 3.1.2. Environmental Impacts

Paving the parking lot and relocating the pollinator garden could create safe, low maintenance use of the Mustang Loop area. Adding electrical and water utilities to the pavilion could further enhance the use and security of the Mustang Loop area.

##### 3.1.2.1. *Impacts of Alternative A – No Action Alternative*

The No Action alternative would result in the installation of an expanded #21A gravel parking lot as described in the Pavilion EA. The parking surface analyzed in the Pavilion EA was #21A compacted gravel. Compacted gravel is an impermeable surface as defined by the state of Virginia (Virginia’s Legislative Information System, 2022) and Fairfax County (Fairfax County, Virginia – Code of Ordinances, 2023). Because a #21A gravel parking lot is an impermeable surface, it would continue to expose users to ponding and rutting during wet conditions and dust during dry conditions. Parking and traffic flow would continue to be an issue due to the lack of clearly marked parking spaces. A #21A gravel parking lot would not comply with the ADA or ABA.

Installation of electrical and water utilities at the multipurpose pavilion would not occur. Not installing electrical utilities would mean generators would still be used during WH&B adoption events and environmental education events. Generator use creates a loud, consistent noise that can be agitating to wild horses and burros and the public. Without electrical utilities, the BLM would install security lighting with solar, which can be less reliable. Without the installation of water utilities at the multipurpose pavilion, water would continue to be trucked in from the local fire station during events.

The existing pollinator garden would stay in its current location within the gravel parking lot. The garden would have continual exposure to gravel and stone dust. Exposure would be heightened during WH&B adoptions and environmental education events. Vehicle traffic in the parking lot would present a safety hazard to BLM staff and volunteers tending to the garden. Visitor use and enjoyment of the garden would similarly be impacted by vehicle traffic, as well as the increased use of the site during WH&B adoptions and environmental education events.



Loud noises from vehicles, dust and gravel spray from vehicles, and human presence are things that can deter pollinators from visiting the garden.

### 3.1.2.2. *Impacts of Alternative B – Proposed Action*

The Proposed Action would improve use and access for visitors at the Mustang Loop area. Asphalt pavement would resist ponding, rutting, and alleviate dust created by vehicles on a #21A gravel surface. In the Pavilion EA, the BLM analyzed the expansion of up to a 2.1-acre parking lot at Mustang Loop to accommodate use of the site for WH&B adoption events and environmental education events. Since compacted gravel and asphalt are both impervious surfaces, the Proposed Action in this EA would not increase the impervious surface beyond what was already considered in the Pavilion EA. The BLM will use Fairfax County BMPs as required and appropriate to ensure the site continues to achieve state and county stormwater management requirements when paving the parking lot with asphalt.

Parking stalls would be clearly marked with paint to encourage organized parking, accessibility, and traffic flow during high use events like WH&B adoption events and environmental education events. Installing electrical and water utilities would provide readily available power and water for WH&B adoption and environmental education events. Relocating the pollinator garden would maximize its use, enjoyment, and increase safety for all visitors. The pollinator garden would be planted with native, sustainable species, which would require less maintenance over time, less water, and encourage pollinators such as bees, monarchs, and other pollinators in a location more connected to other pollinator habitat.

## **CHAPTER 4. PUBLIC INVOLVEMENT, CONSULTATION AND COORDINATION**

### **4.1. Public Involvement**

At an information session at Meadowood SRMA on January 5, 2023, this project was introduced to the public. The draft EA was posted to the BLM’s national NEPA register, ePlanning, at <https://eplanning.blm.gov/eplanning-ui/project/2021109/510> in February 2023 for a 45-day public comment period. A virtual information session to present the project in more detail and respond to questions from the public was held in March 2023. The public comment period was extended for three additional days due to maintenance to the ePlanning system, which could have prevented public access. Upon completion of the public comment period, the BLM has summarized the comment analysis effort, provided responses to the public comments in Appendix A, and made any necessary changes in the final EA based on comments.

### **4.2. Consultation and Coordination**

Consultations were previously conducted in preparation of the Multipurpose Pavilion EA, which covers the same project area as the Proposed Action.

Section 7 of the Endangered Species Act (ESA). On February 1, 2023, the BLM completed informal consultation with the U.S. Fish and Wildlife Service (USFWS) through the USFWS Information for Planning and Consultation (IPaC) system. An Official Species List was generated in IPaC and identified two Threatened, Endangered, or Candidate species that may

occur in the action area: the Northern Long-eared Bat (NLEB) (threatened) and the Monarch Butterfly (candidate). Consultation with USFWS under Section 7 of the ESA is not required for candidate species. The NLEB would not be exposed directly or indirectly to the Proposed Action or any resulting environmental changes. Maternity habitat or roosting sites for the NLEB have not been identified as present in the action area and the project does not otherwise present a risk to the species. As such, a “no effect determination” to the NLEB is appropriate and no further coordination or consultation with USFWS is required.

Several migratory birds, eagles, and their habitats potentially occur in the Meadowood SRMA area. The Proposed Action would not impact any of these species as there are no planned activities that involve tree cutting and removal.

Section 106 of the National Historic Preservation Act. On May 5, 2021, following completion of an intensive cultural resources inventory of the project area, the BLM sent a letter to Virginia Department of Historic Resources (DHR) that explained BLM’s finding of no adverse effect to historic properties resulting from the Proposed Action. The Virginia DHR concurred with the BLM’s determination on June 3, 2021.

Government-to-Government Consultation. On May 6, 2021, the BLM sent letters to nine Tribes to inform them of the proposed project and need for action, including: Pamunkey Indian Tribe, Delaware Tribe of Indians, Delaware Nation, Chickahominy Indian Tribe, Chickahominy Indians Eastern Division, Upper Mattaponi Tribe, Rappahannock Tribe, Monacan Nation, and Nansemond Tribe. No concerns were expressed by any of the Tribes.

## CHAPTER 5. LIST OF PREPARERS

**Table 2. List of Preparers.**

<b>Name</b>	<b>Title</b>	<b>Area of Responsibility</b>
Kurt Wadzinski	Planning and Environmental Coordinator	NEPA Compliance
Donna Charleston	Planning and Environmental Specialist	NEPA Compliance
Kadiatou Darria	Natural Resource Specialist (Detail)	Alternative Development
Casey Cate	Natural Resource Specialist (Detail)	Alternative Development
Danielle Donkersloot	Natural Resource Specialist	Alternative Development; ESA Consultation
Wesley Willoughby	Archeologist	Cultural Resources; SHPO/Tribal Consultation
Jessie Roper	Natural Resource Specialist (Detail)	Alternative Development

<b>Name</b>	<b>Title</b>	<b>Area of Responsibility</b>
Sam Cox	Natural Resource Specialist (Detail)	Alternative Development
Andrew Peng	Civil Engineer	Design Features
Lindy Nelson	Assistant Manager – Natural Resources, BLM NSDO	Reviewer
Zachary Reichold	Manager, BLM LPFS	Reviewer
Stephanie Carman	District Manager, BLM NSDO	Reviewer

## REFERENCES

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## APPENDICES

## APPENDIX A

### Response to Public Comments on the Multipurpose Pavilion Utilities and Parking Lot

The Bureau of Land Management (BLM) published the environmental assessment (EA) for the Multipurpose Pavilion Utilities and Parking Lot on February 21, 2023. Publication of the EA began a 45-day public comment period. The comment period was extended by three days and ended on April 10, 2023. Comments on the EA were accepted by the BLM using the ePlanning project website at <https://eplanning.blm.gov/eplanning-ui/admin/project/2021109/510> during the 48-day comment period.

The BLM assesses and considers comments on the EA both individually and collectively. This appendix focuses on substantive comments. The BLM National Environmental Policy Act Handbook (H-1790-1) defines substantive and non-substantive comments as indicated below.

Substantive comments do one or more of the following:

- Question, with reasonable basis, the accuracy of information in the EA
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis
- Present new information relevant to the analysis
- Present reasonable alternatives other than those analyzed in the EA
- Cause changes or revisions in one or more of the alternatives

Comments that are not considered substantive include the following:

- Comments in favor of or against the Proposed Action or alternatives without reasoning that meet the criteria listed above
- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above
- Comments that do not pertain to the project area or the project
- Comments that take the form of vague, open-ended questions

In response to substantive comments, the BLM could do the following:

- Modify alternatives, including the Proposed Action
- Develop and evaluate alternatives not previously given detailed consideration by the agencies
- Supplement, improve, or modify their analyses
- Make factual corrections
- Explain why the comments do not warrant further agency response, citing appropriate sources or authorities

This appendix summarizes the substantive comments received during the public comment period and how the BLM addressed these comments in the development of the EA.

## Comments Analysis

The BLM received 21 submissions from the public during the public comment period on the February version of the EA. Duplicate submissions from the same sender made through more than one submission method were included in this total. Each submission received was assigned a unique letter number and reviewed individually for substantive comments.

Letters were categorized based on the content of the submission as unique; duplicate; form letter (submissions that were identified as identical letters submitted by individuals as part of an organized letter writing campaign with no unique text); and form letter plus (submissions that were identified as part of an organized letter writing campaign that also contained unique text added to, embedded in, or altered from the form letter text). Of the 21 letters from the first comment period, 19 letters were unique, one letter was a duplicate, and two letters were part of organized letter writing campaigns.

After the 21 submissions received during the public comment period were assigned a unique letter number, the content of the letter was reviewed. Based on this review, individual substantive comments were identified. Each individual substantive comment was assigned a topic-based code according to the issue raised in the comment. If a letter brought up multiple different issues, the letter text was parsed into separate comments, and each comment was assigned a code based on the topic of the unique comment. This parsing process resulted in approximately 68 individual comments, which were then coded according to the issues raised. Comments relevant to more than one topic were given secondary codes to ensure that they were captured under each issue.

**Table C-1** lists the substantive comments received during the public comment period, along with the BLM's responses to those comments. Many commenters expressed similar or identical concerns. For these often-repeated concerns, the BLM summarized the concerns and indicated all applicable letter numbers that raised the concern. **Table C-2** lists all commenters and the corresponding comment letter number(s) to their submission(s). All comments received have been incorporated into the project record and can be accessed by contacting the BLM.

Comment # and Topic	Comment Letter #(s)	Comment/Comment Summary	Response
001 – Purpose and Need, Plan Conformance	2, 5	<i>Summary of Concerns:</i> Commenters questioned the purpose and need for portions of the Proposed Action, in particular paving the parking lot and relocating the pollinator garden. Commenters questioned how paving and moving the pollinator garden provides safety for animals and humans. In the current condition, there have been no incidents involving safety concerns, specifically visitors struck while at the pollinator garden or horses while walking on gravel.	The BLM describes the need for action in Section 1.3 of this EA, which identifies the management direction from the <i>Meadowood Farm Planning Analysis</i> (BLM, 2003) and the <i>Meadowood Special Recreation Management Area Integrated Activity Management Plan</i> (BLM 2004). In the 2003 plan, the BLM states visitor safety is a top priority at Meadowood. The 2004 plan identified additional management guidance consistent with the 2003 plan. Paving the parking lot and relocating the pollinator garden fit the purpose and need of addressing safety for all visitors. While there have been no reported instances of accidents or injuries to humans or animals, the increase in the number of vehicles during WH&B adoptions and environmental education events increases those chances.
002 – Proposed Action and Description	3, 5, 9, 13, 14, 16, 18, 19, 21	<i>Summary of Concerns:</i> Commenters expressed support for and opposition to all or portions of the Proposed Action. Commenters raised concerns with the decision to pave the parking area with asphalt, stating the potential for erosion and excessive water run-off that could carry toxins into the surrounding soil and cause excessive muddy situations. Commenters questioned why the pollinator garden would be relocated to an area outside of the Mustang Loop area.	The BLM developed the Proposed Action in response to the purpose and need for action. The BLM determined the increase in vehicle traffic during WH&B adoption events and environmental education events sanctioned paving the parking lot with asphalt. Asphalt would provide a smooth, flat surface for all visitors, including animals. The BLM would utilize a contractor to design a parking area that adopts Fairfax County BMPs to meet state and county stormwater management requirements. After further consideration, the



			BLM will move the pollinator garden to an alternate location at the Mustang Loop area. This will provide visitors a safe place to enjoy a wide array of native plant species while also providing pollinators the ability to visit the garden away from dust and noise.
003 – Consideration and Other Locations And Alternatives	13, 14, 18, 19, 21	<p><i>Summary of Concerns:</i> Commenters suggested the BLM keep the pollinator garden at the Mustang Loop location (or closer to the Mustang Loop) instead of the Hidden Pond Trail location citing limited parking, less than ideal sun exposure, and planting of native milkweed near the Caisson horses as issues of concern. Comments suggested to keep the pollinator garden close to the Mustang Loop area for purposes of public access and education events in addition to another pollinator garden at the Hidden Pond trail to create space to enhance opportunity for threatened and endangered pollinator species.</p> <p>Commenters suggested the BLM should consider using a permeable paving surface or other permeable options.</p> <p>Commenters suggested the BLM add a fire hydrant when adding the water utilities.</p>	<p>The BLM assessed the comments regarding the relocation of the pollinator garden to another area of the Meadowood SRMA. Since the pollinator garden would be used for environmental education events, the decision was made to keep the pollinator garden at the Mustang Loop area, which is where the environmental education events will take place. This eliminated the concerns for limited parking, less than ideal sun exposure, and planting of milkweed near the Caisson horses.</p> <p>In response to comments, the BLM researched other permeable surfaces, including porous concrete and permeable interlocking concrete pavers. These alternatives were considered but eliminated from detailed analysis. See Section 2.3.</p> <p>The BLM could consider installation of a fire hydrant, after coordinating with the local agencies.</p>
004 – Viewshed Impacts	12, 19	<p><i>Summary of Concerns:</i> There is concern from commenters the two-acre paved parking lot will create a non-natural look.</p>	<p>The BLM is planning for a parking area large enough to provide parking and space for trucks and trailers, vehicles, and other motorized transportation during WH&amp;B adoption events and environmental education events. The BLM took into consideration the increase in vehicles and the</p>

		There was a comment regarding additional landscaping installation, care, and maintenance at the pavilion that faces Gunston Road.	<p>sizes of the truck and trailer combination to provide additional parking areas for other visitors during these times of up to two WH&amp;B adoption events and approximately 12 environmental education events per year.</p> <p>Landscaping at the pavilion facing Gunston Road was addressed in the Pavilion EA in Section 3.3 on page 21.</p>
005 – Impacts to Biodiversity	13, 14, 17, 19, 21	Commenters raised concern regarding the relocation of the pollinator garden to an area with less sun exposure, which could result in less growth of milkweed and native plants, which are important to pollinator species. Commenters mentioned security lighting could have an impact to nocturnal species.	<p>The BLM will be relocating the pollinator garden to stay within the Mustang Loop parking area.</p> <p>The security lighting would be positioned down (rather than toward the sky), be motion activated, and have orange-colored lights to minimize light pollution. Security lighting has been addressed in Section 2.2.1. of this EA.</p>
007 – Animal Health and Safety	2, 17, 21	<i>Summary of Concerns:</i> Commenters had concerns about the safety of horses and dogs on a paved parking lot. A commenter said wet asphalt surface is a slipping danger to horses. There was concern about the location of the pollinator garden close to the Caisson horses and the danger of milkweed. A commenter said the hot asphalt surface can be a hazard to dog paws.	<p>The BLM has great concern for the safety of all visitors and animals. There is always a risk for an accident on any surface, even flat ones. The intention for the horses at the Mustang Loop parking area is for visitors to load and unload their horses from a trailer. This would result in very short time a horse would be on an asphalt surface. The BLM also considered how horses are used for many occasions on many different surfaces. Two examples include:</p> <ul style="list-style-type: none"> <li>• Caisson horses pull a cart carrying a casket for many miles, in all weather conditions, on roads made of concrete and/or asphalt.</li> </ul>

			<ul style="list-style-type: none"> <li>Horses are used to carry police officers through crowds on concrete and/or asphalt for the duration of a shift or the full length of a parade.</li> </ul> <p>Any road or street surface can become too hot and cause burns to dogs. Visitors should take care to ensure their dog(s) will spend a short time on asphalt on hot, sunny days and/or protect their feet when they are on it.</p>
009 – Public Involvement and Decision Process	4, 6	<i>Summary of Concern:</i> Commenters expressed disappointment with the level of community involvement prior to publishing the draft EA.	<p>The BLM involved the public on the EA for the Meadowood Multipurpose Pavilion Utilities and Parking Lot consistent with the CEQ regulations at 40 CFR 1500 and guidance contained in the BLM NEPA Handbook (H-1790-1). See Section 4.1 of this EA for a summary of public involvement opportunities offered during the development of this EA. The EA is available on the project’s ePlanning website.</p> <p>The BLM held an information meeting in January 2023 and this project was introduced to those attendees. The BLM published the EA on ePlanning on February 21, 2023, initiating a 45-day comment period. The comment period was extended by three days due to ePlanning being unavailable for maintenance. A public meeting was held via Zoom on March 6, 2023, which was promoted via social media, the BLM website, email, and local newspaper advertisements. Information regarding the virtual public meeting,</p>

			<p>including a link to the recording of the meeting, was posted on the project’s ePlanning website.</p> <p>Public comment periods on NEPA documents are part of the decision-making process. The purpose is to gather information not previously considered; identify issues for analysis; identify modifications to existing alternatives or new alternatives the agency should consider; identify opportunities to supplement, improve, or modify the environmental analysis; and make factual corrections. Substantive comments submitted during a public comment period can result in changes to the purpose and need for action, alternative, and the analysis, which are captured in the final EA. Following completion of this EA, the BLM authorized officer will review the complete environmental analysis, among other considerations such as the results of consultation efforts, to determine whether the action would have significant impacts under 40CFR 1501.3(b) and 40 CFR 1501.6 and to reach a decision on the proposal. The decision will be document in a Decision Record. The completed EA and Decision Record will be made available on the project’s ePlanning website.</p>
011 – Surface Water and Watershed Management	3, 13, 14, 16, 21	<i>Summary of Concerns:</i> Comments were made with concern to the negative impacts of water runoff to surface water and the Potomac watershed. Erosion was mentioned as another concern.	The BLM would utilize a contractor to design a parking lot that adopts Fairfax County BMPs as required and appropriate to ensure the site continues to achieve state and county stormwater management requirements when resurfacing the parking lot with asphalt. When considering parking lot material alternatives, stormwater

			runoff and ground water infiltration were selected as criterion for alternative comparisons. The other criteria selected included safety, life span of materials, cold weather considerations, and maintenance needs.
012 – Laws and Policy	21	<i>Summary of Concerns:</i> A comment references the newly proposed Public Lands Rule.	The newly proposed Public Lands Rule will not be approved and implemented before the Decision Record is signed for the Mustang Loop project. The BLM does follow its current mission statement that reads: The Bureau of Land Management's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations, and to uphold existing laws and regulations.
014 – Cultural Resources	6	<i>Summary of Concerns:</i> A commenter inquired why we reached out to Tribes for this project.	Under 36 Code of Federal Regulations (CFR) 800, the BLM is responsible for compliance with Section 106 of the National Historic Preservation Act (NHPA), as well as for Government-to-Government consultation with Federally recognized Tribes throughout the federal review process. The BLM performed a cultural resource inventory, which includes a record search and survey on May 5, 2021, as part of the Pavilion EA. The BLM sent a letter to the Virginia Department of Historic Resources (DHR) explaining the BLM's finding of no adverse effect to historic properties because of the Proposed Action. The Virginia DHR concurred with the BLM's determination on June 3, 2021.

			<p>On May 6, 2021, the BLM sent letters to nine Tribes with ties to the area to inform them of the proposed action and need for action, including: Pamunkey Indian Tribe, Delaware Tribe of Indians, Delaware Nation, Chickahominy Indian Tribe, Chickahominy Indians Eastern Division, Upper Mattaponi Tribe, Rappahannock Tribe, Monacan Nation, and Nansemond Tribe. No concerns were expressed by any Tribes.</p>
015 - Recreation	11, 19	<p><i>Summary of Concerns:</i> A commenter asked for us to provide data on how visitors came to Meadowood SRMA total, information on how many visitors specifically visited the Mustang Loop parking lot/trailhead, and how we came up with the estimates.</p> <p>A commenter asked to describe other uses, events, and activities anticipated at Mustang Loop and the newly added pavilion. There was a question as to what events require a Special Use Permit.</p> <p>A commenter asked for “high use events” to be defined.</p>	<p>Each trailhead has motion sensors to count the number people entering. The counter will count all legs that pass the motion sensor; we take that total and divide by two. For the years 2021 through April 2023, the total number of visitors recorded by motion sensors was 66,563. At the Mustang Loop trailhead specifically, there were 10,625 visitors. The Mustang Loop is the second highest used parking lot and trailhead in the Meadowood SRMA.</p> <p>The BLM is committed to offering outstanding recreation opportunities to the public while ensuring good stewardship of public lands and resources. Special Recreation Permits (SRPs) are issued to ensure public health and safety, protect natural and recreational resources, reduce user conflicts, achieve recreation and other resource management objectives, and enhance the public’s opportunity for quality recreation experiences.</p> <p>SRPs are authorizations for commercial use, competitive events, group activities, recreation events, and providing vending services or supplies</p>

			<p>associated with recreation events. These permits include conditions of use (stipulations) that ensure that the permitted recreation use meets BLM’s goals of providing opportunities for recreation experiences and ensure that the use is consistent with other resource management objectives. SRPs also ensure that the public receives a fair value return for certain recreational uses of the public lands, by charging fees for permitted activities, and provides for economic development in surrounding communities through sustainable recreation uses.</p> <p>Individual SRPs are issued when extra measures are required for natural and cultural resource protection, or to provide for the health and safety of visitors. They may also be used to disperse recreation use or help ensure that the number of visitors does not exceed the capacity of the land or adversely affect the visitor experience.</p> <p>For more information on SRPs, please click <a href="#">here</a>.</p> <p>“High use events” is mentioned in section 3.1.2.2. and refers to the events defined as WH&amp;B adoption events and environmental education events held at the pavilion.</p>
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Letter #	Name, Organization	Letter #	Name, Organization	Letter #	Name, Organization
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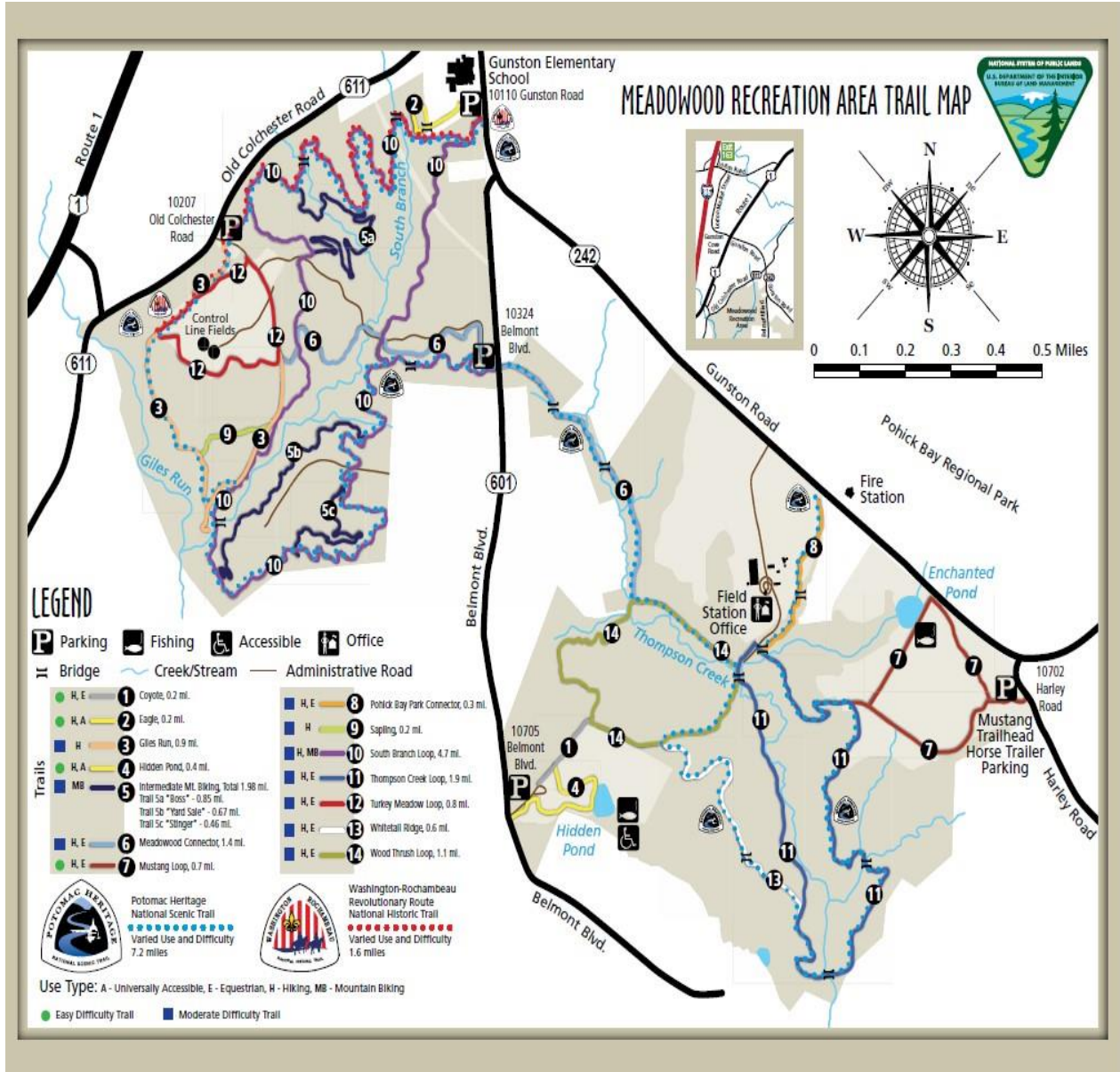
1	Barty Sorrells	7	John Pasour, Mason Neck Civic Association	16	Marvin Miller
2	Terry Abrams	8	Ann Sauer	17, 20	Maria Abrams
4, 5	Brian Purdy	9	American Citizen	18	Richard Hutson
5	Brian Purdy	13, 14	Nancy Wilcochka, Mascon Neck Citizens Association	21	James Martin
6	Jonathan Kiell	15	Public Lands Supporter	3, 10, 11, 12, 19	Name Not Provided



**APPENDIX B**

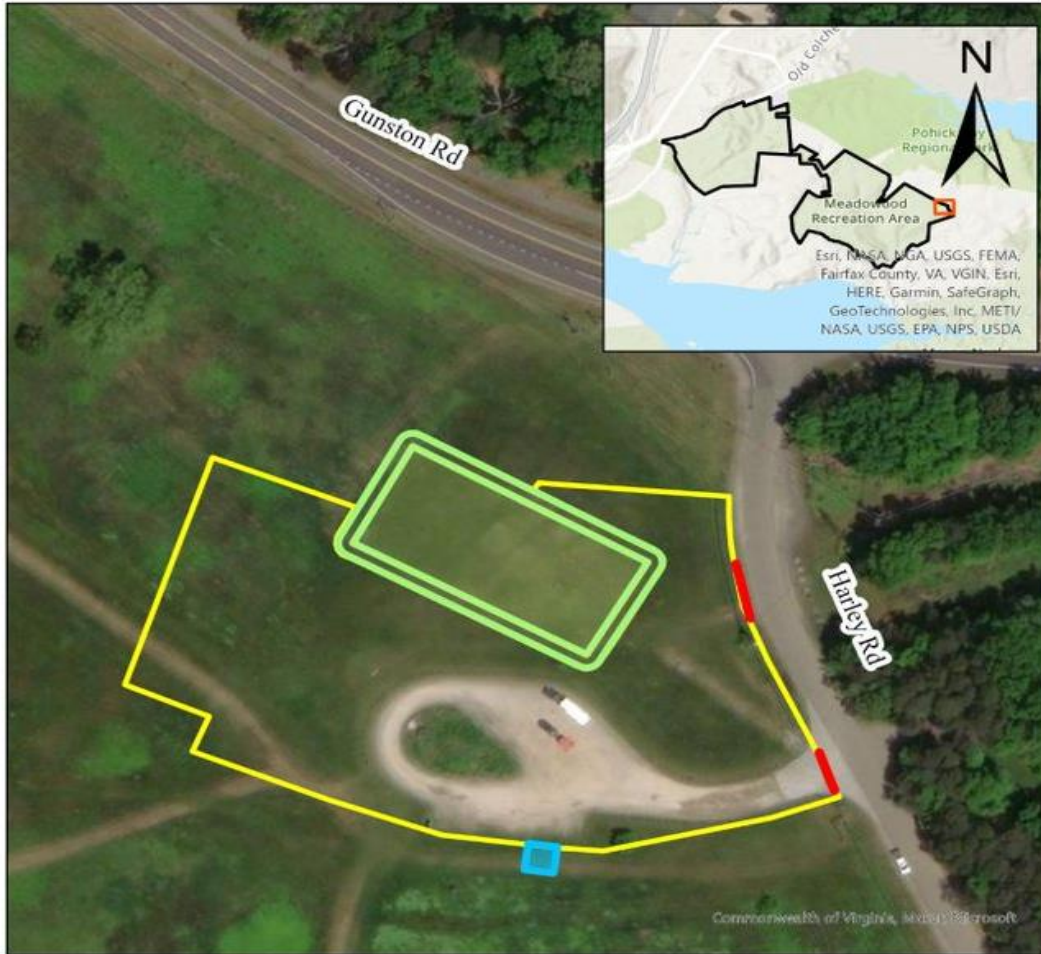
**Maps**

# Map 1: Meadowood Recreation Area Trail Map



**Map 2: Mustang Loop Parking Lot Proposed Action Locations**

**Multipurpose Pavilion Parking Area at Mustang Loop  
Meadowood Special Recreation Management Area**



0 62.5 125 250 Feet

- Multipurpose Pavilion
- Vault Toilet
- Gate
- Parking Lot

Bureau of Land Management  
Lower Potomac Field Station  
10406 Gunston Road  
Lorton, Virginia 22079

No Warranty is made by the Bureau of Land Management to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

