



FINDING OF NO SIGNIFICANT IMPACT AND DECISION RECORD

GLEN ECHO PARK MANAGEMENT PLAN AMENDMENT IN GLEN ECHO, MARYLAND Environmental Assessment

Recommended:

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FINDING OF NO SIGNIFICANT IMPACT AND DECISION RECORD

GLEN ECHO PARK MANAGEMENT PLAN AMENDMENT

GEORGE WASHINGTON MEMORIAL PARKWAY

GLEN ECHO, MARYLAND

INTRODUCTION

The National Park Service (NPS) prepared an environmental assessment (EA) consistent with the National Environmental Policy Act (NEPA) (42 U.S.C. 4321 et seq.), the Department of the Interior (DOI) NEPA regulations, 43 CFR 46, and the 2026 DOI Handbook of NEPA Implementing Procedures (516 DM 1 Handbook). This Finding of No Significant Impact (FONSI) documents the NPS's determination that the Glen Echo Park (Park) Management Plan Amendment (the Plan) will not result in significant environmental impacts.

The Plan identifies areas within the Park for new development, existing buildings and structures to be removed, accessibility improvements to pedestrian access routes, and stormwater management improvements. The Park offers year-round arts and cultural programming and special events within the unique historic setting of the former Glen Echo Amusement Park. The Plan will amend the Glen Echo Park 2001 Management Plan and Environmental Impact Statement (2001 Plan), which selected a partnership management structure for the Park as the preferred alternative. In 2002, the NPS and Montgomery County entered into a cooperative agreement to assign daily management of the Park to the County. In turn, Montgomery County established a non-profit organization, the Glen Echo Park Partnership for Arts and Culture, as an independent non-profit partner to serve as the on-site manager and program leader within the Park. Today, existing facilities are fully programmed, leaving no capacity for new or additional public programming. New development at the Park is allowed if it is consistent with the Park's management zoning map and park mission goals. The NPS will need to approve any new development and prepare additional appropriate compliance and approval reviews. This Plan provides the framework for future development within Glen Echo Park that would coordinate with the NPS but be carried out by either Glen Echo Park Partnership for Arts and Culture or Montgomery County. Implementation of the actions outlined in this plan would be done incrementally as funding becomes available. Prior to implementation, the Park will cross-reference the EA, this FONSI, and all pertinent compliance requirements (i.e., Section 106 of the NHPA, Section 7 of the ESA, or other CZMA requirements) to ensure all compliance is still current and covers the actions as described in their entirety.

PURPOSE AND NEED FOR THE ACTION

The purpose is to develop a Management Plan Amendment for the Park that protects the Park's cultural and natural resources while providing guidance to achieve the following:

- Increase capacity for arts and cultural programming, special events, and future programming related to history and the environment at the site.
- Provide capacity for future programming related to desegregation and African American history associated with the Park.
- Improve the visitor experience through expanding amenities at the Park and enhancing circulation and wayfinding to and within the Park.
- Improve physical and programmatic accessibility deficiencies.

The Plan is needed to address the following issues:

- Existing facilities are fully programmed. There is no unused building space that allows for additional public programming. There is an unmet demand for additional arts and cultural programming.
- The Park lacks interpretation of a comprehensive history of the site.
- Current infrastructure within the Park minimally supports visitors who arrive by walking, biking, or public transportation.
- Many buildings, outdoor spaces and circulation routes, and programs are not fully Architectural Barriers Act (ABA) accessible, creating barriers for visitors with disabilities.
- Increasing visitor demand requires adaptable Park facilities and outdoor spaces that support programming throughout all seasons.

SELECTED ACTION

The NPS selected the proposed action for implementation, which identifies areas within the Park for new development (e.g., buildings, structures, and associated pathways or other impervious surfaces). The Plan identifies some existing buildings and structures that would be removed.

Pedestrian access routes will be improved to comply with the Architectural Barriers Act Accessibility Standards (ABBAS), Section 504 of the Rehabilitation Act, and/or Public Rights-of-Way Accessibility Guidelines (PROWAG) (where jurisdictionally applicable). Stormwater management improvements will also be made throughout the site. The selected action includes:

Facilities

The following existing buildings and structures will be removed: the six yurts, pottery kiln and shed, and restroom building adjacent to the Carousel. These buildings and structures are non-contributing resources to the Glen Echo Amusement Park Historic District, which was listed in the NRHP in 1984. The six yurts and pottery kiln and shed are non-contributing elements to the Glen Echo Park-Clara Barton House Cultural Landscape. However, the restroom building

adjacent to the Carousel, which is identified as the “Comfort Station” in the Glen Echo Park-Clara Barton House Cultural Landscape Inventory (2011), is a contributing resource to the Glen Echo Park-Clara Barton House Cultural Landscape.

Buildable zones for potential future development to support the need for expanded programming and visitor services will be located at the:

- Crystal Pool buildable zone
- Yurts buildable zone
- Southeast Corner buildable zone along Tulane Avenue
- Maintenance Yard buildable zone
- Tulane Avenue Field buildable zone
- Minnehaha Woodland buildable zone

Circulation and Accessibility

Accessibility improvements will be implemented throughout the Park to provide equal physical and programmatic access. These improvements will comply fully with the ABA, Section 504 of the Rehabilitation Act, and/or PROWAG (where jurisdictionally applicable).

Existing pedestrian routes will be improved, and new accessible pathways will be created within the Park. The existing main parking lot will be modified to accommodate designated accessible parking spaces and an accessible bus drop-off area for school buses and tour buses. Additional accessible parking spaces will be established within the existing permit parking lot along MacArthur Boulevard.

Existing pedestrian routes with steep slopes will be regraded, where technically feasible, to achieve compliant sloped walkways. In locations where regrading is not possible, ramps will be constructed with handrails, guardrails, and landings as required to meet accessibility standards. These improvements will address current deficiencies and support a more inclusive and welcoming experience for all visitors.

Stormwater Management

Stormwater management improvements will be incorporated throughout the site. These improvements will include stormwater infrastructure upgrades, vegetated stormwater interventions, and targeted solutions to address localized flooding concerns. Potential improvements could include, but are not limited to, storm sewer pipe and inlet installations, underground stormwater detention, bioretentions, vegetated swales, manufactured treatment devices, green roofs, infiltration practices, and rainwater harvesting. A variety of strategies will be explored to meet or exceed applicable local, state, and federal regulatory requirements.

DESIGN FEATURES TO MINIMIZE IMPACTS

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse impacts to affected resources, whether under the jurisdiction of the NPS or as a result of an NPS decision. To help ensure the protection of cultural and natural resources and the quality of the visitor experience, the NPS will implement mitigation measures to avoid and/or minimize impacts. Proposed mitigation measures of the selected action are provided in **Attachment A**. The mitigation measures will allow the NPS to meet its conservation mandates as required by the NPS Organic Act and related authorities (54 U.S.C. 100101 et seq.) and minimize disruption to park visitors.

FINDING OF NO SIGNIFICANT IMPACT

A description of all potential environmental effects associated with the proposed action and the no action alternative is included in the EA, incorporated by reference herein. The statements and conclusions reached in this FONSI are based on documentation and analysis provided in the EA and associated decision file. Consistent with the DOI NEPA Handbook, Section 1.2(b), the NPS evaluated the significance of the selected action, identified as the proposed action in the EA, by analyzing the potentially affected environment and the degree of the effects of the proposed action. Significance is determined solely in relation to reasonably foreseeable adverse effects. The degree of effect is considered by evaluating both short- and long-term effects, both beneficial and adverse effects, effects on public health and safety, economic effects, and effects on the quality of life of the American people.

The EA discloses the reasonably foreseeable effects of the proposed action, including the combined effects of the proposed action with those of past, ongoing, and anticipated future actions on the park's historic properties, buildings, and structures, cultural landscapes, vegetation, and visitor use and experience. While other park resources may experience some effects, those effects are minimal and were determined to not warrant detailed analysis in the EA. Accordingly, these resources are not discussed further here, as the anticipated effects are so minor that they have no potential result in significant impacts. For a detailed description of the issues and impact topics considered but dismissed, see pages 7-12 of the EA.

POTENTIALLY AFFECTED ENVIRONMENT

A more detailed description of the potentially affected environment per resource is included in the EA under the subheadings "Affected Environment" for each resource carried forward for analysis, including historic properties, buildings, and structures (see EA pages 29 – 38), cultural landscapes (see EA pages 38 – 48), vegetation (see EA pages 49 – 52), and visitor use and experience (see EA pages 52 – 58).

Established in 1891 as the National Chautauqua site, Glen Echo Park has a distinguished history rooted in educational and cultural advancement. Originally part of the Chautauqua movement, the park became a renowned destination for lectures, performances, and community enrichment. As the Chautauqua era waned, Glen Echo Park transitioned into a prominent amusement park, notable for its trolley access and attractions that served visitors from the greater Washington, DC area. The park featured a carousel, dance hall, arcades, and scenic grounds along the Potomac River, becoming a focal point for recreation and social gatherings throughout the early and mid-20th century. In 1970, stewardship of the park was assumed by the General Services Administration and subsequently transferred to the NPS in 1976, ensuring the site's preservation as an asset of historical and cultural significance. Glen Echo Park is the sole Chautauqua assembly site and early 20th-century trolley amusement park within the national park system. Today, its 30 buildings—ranging from historic structures to newer facilities—continue to support

the park's mission as a regional arts center, offering year-round educational programs, performances, and creative opportunities for the public.

The Park attracts over 300,000 visitors annually and is home to 13 resident organizations as well as the Glen Echo Park Aquarium, a Chesapeake Bay Learning Center. Glen Echo Park manages historic facilities such as the Spanish Ballroom and Dentzel carousel and collaborates with resident and visiting artists and organizations to produce and curate park content. This vibrant community hosts festivals, concerts, art classes, social dances, and many other artistic, cultural, and educational offerings, fostering a thriving environment for creatives and visitors alike.

SHORT AND LONG-TERM BENEFICIAL AND ADVERSE EFFECTS

Historic Properties, Buildings, and Structures

The Area of Potential Effect (APE) for the selected action includes historic districts and individually listed historic properties that have been listed in the National Register of Historic Places (NRHP). The selected action will have potential adverse impacts to the NHRP-listed Glen Echo Amusement Park Historic District as a result of the introduction of new buildings and resulting changes to the setting, views, and vistas. The degree of impact to the historic district's integrity of setting, feeling, and design will depend upon the final design decisions for the new improvements. Further design development within the buildable zones is needed. No adverse impacts to the other historic properties within the APE are expected.

The selected action will avoid, minimize, and mitigate adverse impacts to the historic district through future design and construction work associated with individual development projects, which will undergo the Section 106 of the NHPA compliance process separately. Consultation with the Maryland State Historic Preservation Office (MHT or SHPO) and relevant tribes will occur as specific projects are designed and implemented.

Cultural Landscapes

The APE for the selected action includes the Glen Echo Park-Clara Barton House, Glen Echo Park Crystal Pool, Clara Barton National Historic Site, and Clara Barton Parkway cultural landscapes. The selected action will have adverse impacts to these cultural landscapes, except the Clara Barton Parkway Cultural Landscape, as a result of the new pedestrian bridge and associated vegetation removal, the removal of the restroom building adjacent to the Carousel (i.e., a contributing resource to the Glen Echo Park-Clara Barton House Cultural Landscape), the introduction of new buildings, and accessibility improvements. The degree of impact to these cultural landscapes will depend upon the final design decisions for the new improvements. Further design development within the buildable zones is needed. No adverse impacts to the Clara Barton Parkway Cultural Landscape are expected.

The selected action will avoid, minimize, and mitigate adverse impacts to the cultural landscapes through future design and construction work associated with individual development projects,

which will undergo the Section 106 of the NHPA compliance process separately. Consultation with the MHT and relevant tribes will occur as specific projects are designed and implemented.

Vegetation

The selected action will result in new development in the buildable zones and circulation, accessibility, and stormwater improvements, which will result in the disturbance or removal of vegetation, including native and/or non-native trees. Further design development within the buildable zones is needed to identify the number of trees and area of vegetation to be impacted. Design work associated with individual development projects will occur in the future and may require separate NEPA compliance where vegetation impacts would be further assessed.

The 2023 tree survey will be updated during detailed design to document existing individual trees within the Park, including any specimen trees, and to identify opportunities to avoid or minimize tree removal. Design objectives will retain existing mature trees to the greatest extent possible. Future development within the buildable zones will comply with applicable local, state, and federal regulations (e.g., Maryland's Forest Conservation Act) and will be sensitive to the natural contexts of the Park and its surroundings. The NPS will also adhere to applicable Best Management Practices during the construction phases.

Visitor Use and Experience

The selected action will result in long-term beneficial impacts and short-term adverse impacts to visitor use and experience. The selected action will provide site-wide accessibility improvements and new areas for potential future development, which will increase the Park's capacity for new or expanded existing arts and cultural programming, special events, and future programming related to history and the environment at the site. During construction, portions of the Park will remain open to visitor access while other areas will be temporarily closed. Pedestrian, bicycle, and vehicle access will be maintained during construction via the use of temporary detours or alternative routes around closed areas. Advanced notice of closures will be provided on the Park's website, and detours will be clearly marked.

Effects on Public Health and Safety

As required by the DOI NEPA Handbook, the NPS is assessing the significance of any effects on the public health and safety. The selected action will not result in significant adverse effects on public health and safety; therefore, this topic was not addressed in the EA.

The selected action will not result in significant adverse impacts on public health or safety. The implementation of the project will not cause significant adverse impacts on public health or safety. During construction, public safety will be maintained through exclusion zones, barriers, signage, and personnel. In addition, the public will be given advance notice of any closures that may occur. Any negative effects will be brief and localized. Over the long term, there will be enhanced accessibility across Glen Echo Park by upgrading pedestrian routes, adding new

accessible pathways, and modifying parking areas to provide designated accessible spaces and bus drop-off zones. Where steep slopes exist, regrading or installing compliant ramps with necessary railings and landings to meet accessibility standards will be installed. These improvements are designed to address existing gaps and ensure all visitors have equal access and a more welcoming experience. Therefore, any adverse effects on public health and safety will be temporary, localized, and mitigated through standard construction controls, while long-term effects will be beneficial.

Economic Effects

As required by the DOI NEPA Handbook, the NPS is assessing the significance of any economic effects. The selected action is not expected to result in significant economic effects at the local, regional, or national level; therefore, this topic was not addressed in the EA. As the DOI NEPA Handbook advises, economic effects should be evaluated in terms of their degree and geographic relevance, with particular attention to local scale impacts.

The selected action will not result in significant adverse economic effects. Construction associated with the implementation of the selected action will result in temporary restrictions on public access and recreation. These temporary construction-related effects will not substantially affect regional or local employment, business activity, tax revenue, tourism, or access to nearby commercial areas. Any short-term economic effects associated with implementation of the revised GMP, including construction employment, materials procurement, lost revenue, and related spending, will be minor and temporary. The implementation of the selection action will also be phased, which will keep certain areas of the Park open with continued programming and keeping the loss of revenue to a minimum. The project will therefore have no significant adverse economic impacts, and any economic effects will be limited, localized, and primarily beneficial.

Effects on the Quality of Life of the American People

As required by the DOI NEPA Handbook, the NPS is assessing the significance of the proposed action's effects on the quality of life of the American People. The selected action will not result in significant adverse effects on the quality of life of the American people; therefore, this topic was not addressed in the EA.

The selected action will not result in significant adverse effects on the quality of life of the American people. When the selected action is implemented and construction begins, there may be brief disruptions to the Park's visitors and surrounding neighbors from associated noise and closures. These effects will be minimized and managed through public notice, site controls, and pedestrian routing. Ultimately, the revitalized area, after the implementation of the selected action will offer lasting improvements to visitor access, recreation, and natural beauty, thereby enriching the quality of life for all who enjoy these spaces.

BASIS FOR THE DECISION

The selected action, Alternative B: Management Plan Amendment (Proposed Action), best meets the project's purpose and need without causing significant resource impacts. The Plan designates six buildable zones to support expanded arts and cultural programming, special events, and future activities related to history and the environment. These zones offer additional space that current facilities cannot provide. These zones are intentionally designed to provide flexibility, allowing specific uses and layouts to be finalized during a future design phase.

The Plan resolves physical and programmatic accessibility deficiencies by bringing pedestrian access routes into compliance with the Architectural Barriers Act (ABA), Section 504 of the Rehabilitation Act, and/or the Public Rights-of-Way Accessibility Guidelines (PROWAG), where jurisdictionally applicable. Existing routes with steep slopes will be regraded where feasible; where regrading is not technically feasible, compliant ramps with handrails, guardrails, and landings will be constructed instead. New development within the buildable zones would similarly incorporate interior and exterior accessible routes, as reflected in the planned accessible route within the Yurts zone building and the accessible pedestrian bridge in the Minnehaha Woodland zone.

The Plan includes removal of existing non-contributing structures including six yurts, a pottery kiln and shed as well as removal of a contributing restroom structure to provide needed program space and improve accessibility and circulation through the site. The Plan also supports stormwater management improvements throughout the site, including storm sewer and inlet upgrades, underground detention, bioretention, vegetated swales, green roofs, infiltration practices, and rainwater harvesting, to address localized flooding and support consistent programming across all seasons.

Based on the EA, subject matter expert input, the Park's foundation documents, and this analysis, the NPS finds that implementing the selected action does not prevent the National Park Service from fulfilling the Park's purposes and will not result in impairment of the resources or values of Glen Echo Park. All future development within the buildable zones would comply with applicable local, state, and federal regulations and would be sensitive to the historic and natural contexts of Glen Echo Park and its surroundings; future buildings may also require separate NEPA and Section 106 compliance.

DECISION

I have reviewed the EA prepared for this project, the analysis of environmental impacts, and all associated compliance documentation. All identified adverse effects are highly localized and minimized through established mitigation measures. Based on this review, I have selected the proposed action for implementation. The EA demonstrates that the selected action will not result in significant adverse impacts on the human environment. Therefore, preparation of an Environmental Impact Statement is not required. Lastly, as the Responsible Official, I certify that

the NPS has considered all relevant information raised during the NEPA process and that the NEPA process is closed (516 DM 1 Handbook § 4.1). I therefore approve the selected action for implementation.

ATTACHMENT A: DESIGN FEATURES TO MINIMIZE IMPACTS

Historic Properties, Buildings, and Structures

Design and construction work associated with individual development projects will occur in the future and undergo the Section 106 of the NHPA compliance process separately to avoid, minimize, or mitigate impacts to historic districts, buildings, and structures. Consultation with the Maryland Historical Trust (MHT) (i.e., Maryland's State Historic Preservation Office) and relevant tribes will occur as specific projects are designed and implemented.

Cultural Landscapes

Design and construction work associated with individual development projects will occur in the future and undergo the Section 106 of the NHPA compliance process separately to avoid, minimize, or mitigate impacts to cultural landscapes. Consultation with the MHT and relevant tribes will occur as specific projects are designed and implemented.

Vegetation

The 2023 tree survey will be updated during detailed design to document existing individual trees within the Park, including any specimen trees, and to identify opportunities to avoid or minimize tree removal. In addition, development projects will be designed in accordance with the Maryland's Forest Conservation Act (FCA) (Natural Resources Article §§ 5-1601–5-1613) that integrates forest conservation into the development review process. For projects on 40,000 square feet or more that apply for a subdivision, grading, or sediment control permit, the FCA requires (i) a Forest Stand Delineation (FSD) to identify and prioritize forest resources and (ii) a Forest Conservation Plan (FCP) to retain, reforest, or afforest as needed.

Design objectives will retain existing mature trees to the greatest extent possible. Protective measures, such as fencing, will be installed around the critical root zone of trees planned for protection during construction. If root impacts are unavoidable, root pruning techniques along with other strategies will be used to best maintain tree health and longevity. Mature trees that cannot be retained in place will be replaced in kind or with a compatible substitution within site landscaping to the extent feasible.

Construction contractors will be required to clean vehicles and equipment offsite, and to use weed-free construction materials, to prevent the inadvertent introduction of invasive plant seeds, propagules, and other weed seeds into the Park. Soils exposed during construction will be revegetated or otherwise stabilized following construction completion. In areas where tree and vegetation removal will occur, the areas will be revegetated using native grasses, shrubs, trees, or other plants where needed for soil stabilization and a natural appearance.

Visitor Use and Experience

During construction, portions of the Park will remain open to visitor access while other areas will be temporarily closed. Pedestrian, bicycle, and vehicle access will be maintained during construction via the use of temporary detours or alternative routes around closed areas. Advanced notice of closures will be provided on the Park's website, and detours will be clearly marked.

ATTACHMENT B: NON-IMPAIRMENT DOCUMENTATION

INTRODUCTION

As described in National Park Service (the NPS or Service) 2006 Management Policies, §1.4.4, the National Park Service Organic Act prohibits the impairment of park resources and values. Guidance for Non-Impairment Determinations and the NPS NEPA Process (April 2025) provides guidance for completing non-impairment determinations for NPS actions requiring preparation of an environmental assessment (EA) or environmental impact statement pursuant to the National Environmental Policy Act (NEPA). The NPS has completed a non-impairment analysis for impacts Glen Echo Park Management Plan Amendment and determined that it will not result in impairment of park resources or unacceptable impacts as described in the 2006 NPS Management Policies.

To make an impairment determination, the NPS must evaluate the following:

An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- Identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS Management Policies 2006, Section 1.4.5).

Resources and values subject to the non-impairment standard include (NPS Management Policies 2006, Section 1.4.6):

- The Park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park, the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- Appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- The Park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and

- Any additional attributes encompassed by the specific values and purposes for which the park was established.

The NPS non-impairment analysis normally does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, land use, park operations, and wilderness, as these do not constitute impacts to park resources and values subject to the non-impairment standard under the Organic Act. See Management Policies § 1.4.6. (see also, Guidance for Non-Impairment Determinations and the NPS NEPA Process, April 2025).

This determination has been prepared for the selected action described in the Finding of No Significant Impact (FONSI). As a basis for evaluating the potential for impairment on President's Park's resources, the NPS relied on the EA. Additionally, the non-impairment analysis for wildlife was informed by the Section 7 documentation for the Endangered Species Act.

The following resources or values were evaluated in detail: historic properties, buildings, and structures, cultural landscapes, and vegetation.

SELECTED ACTION

Glen Echo Park provides year-round arts, cultural programs, and special events within its historic former amusement park setting. This Plan/EA updates the 2001 Management Plan/EIS to expand capacity for arts, cultural, environmental, and historical programming while protecting the park's historic character, natural resources, and enhancing the visitor experience. The proposed action identifies flexible "buildable zones" for future facilities, removes several small existing structures to open central spaces, and ensures development near wooded areas is minimized and carefully designed. It also improves accessibility through upgraded walkways, entrances, parking, and drop-off areas, and introduces new stormwater management systems to reduce flooding, manage runoff, and improve water quality (for a detailed description of the selected action please see pages 19-25 of the EA).

PURPOSE AND FUNDAMENTAL RESOURCES AND VALUES OF GLEN ECHO PARK

The purpose of the parks and their fundamental resources and values are important context for a non-impairment determination.

The purpose of Glen Echo Park is as follows:

Glen Echo Park exists to preserve, protect, and interpret a uniquely layered cultural landscape reflecting more than a century of educational, recreational, architectural, and social history. Originating as a National Chautauqua Assembly in 1891 to promote "liberal and practical education," the site later operated as the Washington region's premier amusement park until 1968.

The park's purpose today is to maintain and interpret its historic resources, support cultural arts and educational programming, provide inclusive recreational opportunities, and steward the broader cultural landscape, ensuring continued access to a place where history, arts, and community converge.

Fundamental resources and values (FRVs) for Glen Echo Park are identified in the George Washington Memorial Parkway foundation document.

Relevant FRV's are discussed where relevant in the analysis below and include:

Recreational Opportunities. The George Washington Memorial Parkway contains a diverse array of recreational opportunities such as hiking, biking, climbing, kayaking, fishing, picnicking, living history, visiting historic sites, cultural activities, wildlife and wildflower viewing, organized sports, and opportunities for solitude. Providing this broad spectrum of recreational opportunities to Washington D.C.'s urban population and improving quality of life in the city is fundamental to the park's mission. These recreational activities are supported by a wide variety of amenities such as the Potomac Heritage National Scenic Trail (including the Mount Vernon Trail), multipurpose playing fields, playgrounds, picnic areas, boat launches, marinas, and expansive natural areas.

Other important resources and values (OIRVs) for Glen Echo Park are identified in the George Washington Memorial Parkway foundation document.

Relevant OIRV's are discussed where relevant in the analysis below and include:

Glen Echo Park Historic District. Glen Echo Park began in 1891 as a National Chautauqua Assembly "to promote liberal and practical education." Glen Echo was an amusement park from 1907 to 1968, and the restored 1921 Dentzel Carousel is still part of the park. Since 1971, the National Park Service has owned and operated the site. In 2002, the Glen Echo Park Partnership for Arts and Culture was established in partnership with Montgomery County, Maryland, to provide year-round cultural and recreational activities at the park.

Historic Properties, Buildings, and Structures

The selected action will have potential adverse impacts to the NHRP-listed Glen Echo Amusement Park Historic District as a result of the introduction of new buildings and resulting changes to the setting, views, and vistas. The degree of impact to the historic district's integrity of setting, feeling, and design will depend upon the final design decisions for the new improvements. Further design development within the buildable zones is needed. No adverse impacts are expected on other historic properties within the APE.

The selected action will avoid, minimize, and mitigate adverse impacts to the historic district through future design and construction work associated with individual development projects, which will undergo the Section 106 of the NHPA compliance process separately. Consultation with the MHT and relevant tribes will occur as specific projects are designed and implemented.

Although the selected action will have a potential adverse impact to the NRHP-listed Glen Echo Amusement Park Historic District, implementation of avoidance, minimization, and mitigation measures are expected to resolve the potential adverse impact. Therefore, the Glen Echo Amusement Park Historic District will not be impaired by the selected action.

Cultural Landscapes

The selected action will have adverse impacts to the Glen Echo Park-Clara Barton House, Glen Echo Park Crystal Pool, and Clara Barton National Historic Site cultural landscapes as a result of the new pedestrian bridge and associated vegetation removal, the removal of the restroom building adjacent to the Carousel (i.e., a contributing resource to the Glen Echo Park-Clara Barton House Cultural Landscape), the introduction of new buildings, and accessibility improvements. The degree of impact to these cultural landscapes will depend upon the final design decisions for the new improvements. Further design development within the buildable zones is needed. No adverse impacts to the Clara Barton Parkway Cultural Landscape are expected.

The selected action will avoid, minimize, and mitigate adverse impacts to cultural landscapes through future design and construction work associated with individual development projects, which will undergo the Section 106 of the NHPA compliance process separately. Consultation with the Maryland State Historic Preservation Office (MHT or SHPO) and relevant tribes will occur as specific projects are designed and implemented.

Although the selected action will have an adverse impact to the Glen Echo Park-Clara Barton House, Glen Echo Park Crystal Pool, and the Clara Barton National Historic Site cultural landscapes, implementation of avoidance, minimization, and mitigation measures are expected to resolve the adverse impact. Therefore, the cultural landscapes will not be impaired by the selected action.

Vegetation

The selected action will result in new development in the buildable zones and circulation, accessibility, and stormwater improvements, which will result in the disturbance or removal of vegetation, including native and/or non-native trees. Further design development within the buildable zones is needed to identify the number of trees and area of vegetation to be impacted. Design work associated with individual development projects will occur in the future and may require separate NEPA compliance where vegetation impacts would be further assessed.

The 2023 tree survey will be updated during detailed design to document existing individual trees within the Park, including any specimen trees, and to identify opportunities to avoid or minimize tree removal. Design objectives will retain existing mature trees to the greatest extent possible. Future development within the buildable zones will comply with applicable local, state, and federal regulations (e.g., Maryland's Forest Conservation Act) and will be sensitive to the

natural contexts of the Park and its surroundings. The NPS will also adhere to applicable Best Management Practices during the construction phases.

Although the selected action will have a potential adverse impact to vegetation, implementation of avoidance, minimization, and mitigation measures are expected to resolve the potential adverse impact. Therefore, vegetation will not be impaired by the selected action.

RESOURCES CONSIDERED BUT DISMISSED

As documented in the EA, other issues and resources were considered but dismissed from detailed analysis because any effects will be brief, localized, and low in intensity, with no lasting change to resource condition or integrity.

Archeological assessments were conducted and found that most prehistoric archeological resources at Glen Echo Park have been disturbed by prior development, though some historic deposits remain. Future development could impact archeological resources; however, specific project designs will undergo separate Section 106 compliance and consultation with relevant agencies and tribes to avoid or mitigate effects. As a result, the NPS has dismissed archeological resources from detailed analysis at this stage.

Wetlands, floodplains, and water resources were also considered but dismissed. Wetlands comprise a small portion of the park and are located along Minnehaha Creek and would be avoided from future development. The park is not currently located within mapped floodplains, though preliminary maps may change; any future projects potentially impacting floodplains will be assessed separately. Water resources, including Minnehaha Creek, may face temporary disturbances during construction, such as soil erosion and increased stormwater runoff, but these impacts will be managed through revegetation, erosion control, stormwater management plans, and compliance with relevant regulations. Overall, adherence to established procedures and standards is expected to avoid or minimize impacts.

The Park provides a variety of wildlife habitats in both developed and natural areas, including Minnehaha Creek and surrounding woodlands. Common wildlife observed includes mammals, reptiles, amphibians, and numerous bird species, with macroinvertebrate sampling of Minnehaha Creek revealing diverse aquatic taxa. The NPS consulted with the U.S. Fish and Wildlife Service to assess the presence of federally-listed threatened and endangered species at the Park. The review identified the potential for the Northern Long-eared Bat, Tricolored Bat, and Monarch Butterfly, as well as the state-threatened Buttercup Scorpionweed and the moderately rare Narrow Melicgrass. The proposed Plan identifies future buildable zones that may impact wildlife habitat during construction, but most displaced wildlife is expected to return after habitat restoration. As the amended Plan is implemented, NPS will continue to coordinate with federal and state agencies during future design phases to avoid impacts on threatened and endangered species, including restrictions on tree clearing. Long-term impacts are anticipated to be minimal, and the NPS will implement best management practices to further reduce effects. Therefore,

impacts on wildlife, including threatened and endangered species and their habitats, have been dismissed from further detailed analysis.

Conclusion

Based on the EA, subject matter expert input, the Park's foundation documents, and this analysis, the NPS finds that implementing the selected action does not prevent the National Park Service from fulfilling the Park's purposes and will not result in impairment of the resources or values of Glen Echo Park.

ATTACHMENT C: CONCERN STATEMENTS AND RESPONSES

This report groups substantive comments into concern statements and provides NPS's responses. Substantive comments are those that are: question, with reasonable basis, the accuracy of the information in the NEPA document; question, with reasonable basis, the adequacy of the environmental analysis; present reasonable alternatives other than those presented in the NEPA document; or cause changes or revisions in the proposal. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive. Comments did not receive responses if they were determined not substantive.

The Glen Echo Park Management Plan Amendment EA was made available for public review from February 12 to March 16, 2026, at the PEPC project webpage [[Glen Echo Park Management Plan Amendment/EA \(nps.gov\)](#)]. The EA public review period was announced on the PEPC project webpage and by news release and email blast. A total of 42 separate correspondences were received during the EA public review period, within which 42 correspondences were reviewed and analyzed. A total of 20 correspondences contained comments considered substantive. These comments were grouped into concern statements of related topic areas and NPS provides responses to those concerns in **Table C- 1**.

Table C- 1. Concern Statements and Responses

Topic	Summary of Concern Statement	NPS Response
Facilities – General	Suggested Proposal: Replace the Hall of Mirrors Dance Studio.	Replacement of the Hall of Mirrors Dance Studio was not proposed for the following reasons. The Hall of Mirrors Dance Studio, referred to as the “Mirror Maze” in the 2011 Glen Echo Park-Clara Barton House Cultural Landscape CLI, is a contributing building to the Glen Echo Park-Clara Barton House Cultural Landscape and dates to the cultural landscape’s historic period of significance. Removal of the building would not result in beneficial impacts on contributing views and vistas.
	Suggested Proposal: Extend the buildable zone to the east of the Hall of Mirrors Dance Studio.	The buildable zone was not extended to the east of the Hall of Mirrors Dance Studio because a buildable zone in this area would not “represent the minimum change in development necessary to support the Park’s growth while protecting its core character and open spaces” as stated on page 19 of the EA.
Facilities – Yurts and Pottery Program	The yurts are historic	Page 37 of the EA states: “[Six yurts] ... are non-contributing resources to the Glen Echo Amusement Park Historic District. These buildings may be reassessed for their eligibility as

Topic	Summary of Concern Statement	NPS Response
		contributing resources in the future as part of the Section 106 of the NHPA compliance process.”
	Suggested Proposal: Add more yurts to the grounds	Page 19 of the EA states, “Future design projects would determine specific building locations, square footage, massing, height, and architectural style.”
	Suggested Proposal: Replace the yurts with “modern, state of the art pottery teaching facility” or outdoor space	Page 57 of the EA states that the pottery program would be re-located “from aging temporary structures without climate control to permanent structures with climate control, which would improve year-round visitor comfort. The re-location into a larger space would also allow for expanded programming to accommodate demand.” Page 19 of the EA states “The removal of the [six yurts, pottery kiln and shed] would reclaim open space at the center of the Park.”
	Suggested Proposal: Open a new Glen Echo Pottery location in addition to the Glen Echo Park location to provide more space for new students	Proposal is outside the scope of the project because the Plan’s project area is the 20.5-acre site, which includes Glen Echo Park. Therefore, buildable zones for future potential development outside of the 20.5-acre site to support the need for expanded programming were not considered.
	Suggested Proposal: Retain the trees and add a picnic area to the yurts	Page 19 of the EA states “The removal of the [six yurts, pottery kiln and shed] would reclaim open space at the center of the Park” and the open space would allow for “future development [that could] range from uncovered, hardscape areas to outdoor pavilions to structures or buildings with conditioned, interior spaces.” Page 52 of the EA also states, “Design objectives would retain existing mature trees to the greatest extent possible.” Therefore, trees could be retained and a picnic area added to the Yurts buildable zone.
Facilities – Restrooms	Concern about demolishing the restroom building, which is convenient to the Carousel and for children’s urgency	Page 57 of the EA states “public restrooms at the Arcade Building and Spanish Ballroom would be retained. New buildings or structures would include public restrooms.”

Topic	Summary of Concern Statement	NPS Response
	Query: Will there be new restrooms?	Page 57 of the EA states “New buildings or structures would include public restrooms.”
Historic Properties, Buildings, and Structures, and Cultural Landscapes	Suggested Proposal: Remove the main visitor parking lot, which is within the legislated boundary of the Clara Barton National Historic Site (NHS), from the project area.	The parking lot area is shared between Clara Barton NHS and Glen Echo Park and co-managed by NPS (George Washington Memorial Parkway) and Montgomery County. Tract 01-102 within the legislated boundary of Clara Barton NHS is included in the project boundary because there are proposed actions related to site circulation, accessibility, and stormwater management. Specifically, alternatives include proposed locations for accessible parking, school bus drop-off zones, and pedestrian routes between the shared parking lot and Glen Echo Park requiring modifications to meet accessibility standards. The proposed changes do not include new structures. Implementation of the proposed modifications in the shared parking lot would be coordinated between Glen Echo Park and Clara Barton NHS in future design development phases. As design progresses, the specific proposed treatments would continue to consider treatment recommendations within the Clara Barton Cultural Landscape Report, circulation between Clara Barton NHS and Glen Echo Park, and current accessibility standards.
	“[T]he EA proposal conflicts with NPS's responsibility under Section 110(f) of the National Historic Preservation Act to protect National Historic Landmarks. The EA fails to include any meaningful Section 110(f) analysis regarding the adverse effects of the proposed actions on the CLBA NHS.”	Within the Clara Barton NHS, the Plan proposes changes to the parking lot shared between the Clara Barton NHS and Glen Echo Park. Implementation of the proposed modifications in the shared parking lot would be coordinated between Glen Echo Park and Clara Barton NHS in future design development phases. As design progresses, the specific proposed treatments would take into account the Clara Barton NHS.
	The EA proposes to intensify the use of the	The Plan would not conflict with recommended landscape treatments in the 2023 Rehabilitate the

Topic	Summary of Concern Statement	NPS Response
	main parking lot, which the 2023 Rehabilitate the Clara Barton National Historic Site CLR identifies as a root cause of the Clara Barton NHS National Historic Landmark's degradation.	Clara Barton NHS CLR. The Plan would improve the current function of the parking lot and improve accessibility between the Clara Barton NHS and Glen Echo Park by modifying the parking lot to accommodate designated accessible parking spaces and an accessible bus drop-off area for school buses and tour buses.
	Suggested Proposal: Include the Washington Aqueduct as a reviewing party for future conceptual and design deliverables	Comment noted.
	Suggested Proposal: Change "Washington Aqueduct" in the EA to "Washington Aqueduct's National Register Historic District and National Historic Landmark District"	No change made in EA to referring to the Washington Aqueduct as a "historic structure." The Washington Aqueduct is listed as a historic "structure" in the National Register of Historic Places Inventory – Nomination Form (see https://catalog.archives.gov/id/117691905). The EA was updated to note that the Washington Aqueduct is a National Historic Landmark.
	Suggested Proposal: Any new structure should not obscure views of the contributing resource and cultural landscape	Page 26 of the EA states "Design and construction work associated with individual development projects would occur in the future and undergo the Section 106 of the NHPA compliance process separately to avoid, minimize, or mitigate impacts on historic districts, buildings, and structures [and cultural landscapes]."
	Suggested Proposal: Requests that future plans provide at-grade views/renderings of the general size and height of proposed new buildings with the existing historic buildings	Comment noted. Page 19 of the EA states, "Future design projects would determine specific building locations, square footage, massing, height, and architectural style. The size and scale of future development within these zones would be considered together with rehabilitation of existing buildings in a future planning phase. All future development within these zones would comply with local, state, and federal regulations and would be sensitive to the historic and natural contexts of Glen Echo Park and its surroundings.

Topic	Summary of Concern Statement	NPS Response
		Future buildings may also require separate NEPA and Section 106 compliance.” Page 26 of the EA also states, “Design and construction work associated with individual development projects would occur in the future and undergo the Section 106 of the NHPA compliance process separately to avoid, minimize, or mitigate impacts on historic districts, buildings, and structures [and cultural landscapes].”
Circulation	Suggested Proposal: Add a pedestrian access path from Clara Barton House to the Chesapeake and Ohio Canal Towpath.	Outside the scope of the project.
	Suggested Proposal: Coordinate with Montgomery County Department of Transportation (MCDOT) and local transportation agencies regarding potential improvements to physical connections and wayfinding between the park, bus, and bikeway facilities along MacArthur Boulevard, and public transportation operating hours to better align with park program.	Comments noted. Page 23 of the EA states “The Plan does not preclude future coordination between NPS, GEPPAC, and Montgomery County regarding potential improvements to physical connections between the Park and the bus stop and bikeway facilities along MacArthur Boulevard, or public transportation operating hours to better align with park program times”

Topic	Summary of Concern Statement	NPS Response
	Suggested Proposal: Consider programming and building space needs holistically during the design phase, rather than individually by project, so that anticipated increases to visitor, traffic, and parking demand can be addressed at the appropriate phase of development.	Programming, building space needs, and potential impacts will be evaluated within the context of Glen Echo Park as a whole and its' surroundings.
Vegetation	Suggested Proposal: Preserve trees and green space at Glen Echo	Page 52 of the EA states "Design objectives would retain existing mature trees to the greatest extent possible. Future development within these zones would comply with applicable local, state, and federal regulations (e.g., Maryland's FCA) and would be sensitive to the natural contexts of Glen Echo Park and its surroundings."
	Concern about the amount of cement on campus	Comment noted. Future development within the Plan's buildable zones "could range from uncovered, hardscape areas to outdoor pavilions to structure or buildings" as stated on page 19 of the EA. Pages 51-52 of the EA also states "The buildable zones do not represent final building footprints and are intentionally oversized to accommodate building and related features. At this time, it is unknown how much vegetation, including trees, would be disturbed or removed. . . . Design objectives would retain existing mature trees to the greatest extent possible. Future development within these zones would comply with applicable local, state, and federal regulations (e.g., Maryland's FCA) and would be sensitive to the natural contexts of Glen Echo Park and its surroundings."
Construction	Query: How will restroom access be impacted during construction?	Public restrooms are located in most buildings at the Park, including in the Arcade Building and the Spanish Ballroom, which would remain open during construction.
	Query: How will traffic, public transportation, and	Page 27 of the EA states "During construction, portions of Glen Echo Park would remain open to visitor access while other areas would be

Topic	Summary of Concern Statement	NPS Response
	pedestrian traffic be impacted during construction?	temporarily closed. Pedestrian, bicycle, and vehicle access would be maintained during construction via the use of temporary detours or alternative routes around closed areas. Advanced notice of closures would be provided on the park website, and detours would be clearly marked”
	Query: Will construction occur mainly during the day or also at night?	While the majority of the work would occur daytime hours, there may be occasions where night work may be required. However, construction timing would comply with applicable local, state, and federal regulations, including Montgomery County’s Noise Control Law.
	Query: What is the duration of the project?	The Plan/EA is a long-range planning document and is required to evaluate current land use and facility capacity of the entire site before individual projects can be approved to expand the built area.

ATTACHMENT D: SECTION 106 COORDINATION LETTERS



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

September 20, 2024

Ms. Elizabeth Hughes
State Historic Preservation Office
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, MD 21032

Attn: Ms. Becky Roman

Dear Ms. Hughes:

In accordance with Section 106 of the National Historic Preservation Act (NHPA) (16 U.S.C. 470f) and its implementing regulations (36 CFR 800), George Washington Memorial Parkway (GWMP), a unit of the National Park Service (NPS), is notifying the Maryland Historical Trust (MHT) of a new undertaking located in Montgomery County, Maryland. The proposed project consists of amending the Management Plan for Glen Echo Park in order to develop additional programmed spaces within the park.

The Glen Echo Park Historic District (M: 35-41) was entered in the National Register of Historic Places in 1984. It measures approximately 9.3 acres and contains nine contributing structures. For over a century, Glen Echo Park has served as a center for education, entertainment, and cultural development. In 1891, it served as the National Chautauqua site, then as an amusement park and finally as a National Park Service (NPS)-managed arts and cultural park. Since 1971, NPS has owned and operated the site. Glen Echo Park preserves the only Chautauqua assembly site and the only early 20th century trolley amusement park in the National Park System. It serves as a regional center for arts and culture, providing year-round educational opportunities to the public – identified as a key contributor to the educational value of GWMP in the park's foundation document. Currently, NPS co-manages the park with Montgomery County and Glen Echo Park Partnership for Arts and Culture Inc. (GEPPAC), with the latter overseeing Glen Echo Park's arts programs and facilities. (see Attachment A – Glen Echo Park Map)

The proposed Management Plan/Environmental Assessment (EA) will serve as an amendment to the 2001 Management Plan/Environmental Impact Statement (EIS) for Glen Echo Park and will evaluate opportunities for GEPPAC to:

- Provide additional arts programming through adaptive reuse or reconfiguration of existing facilities, or through construction of new facilities;

- Improve accessibility, circulation, and wayfinding to and within the site; and
- Implement stormwater and sustainability best practices.

The 2001 Management Plan/EIS stated that the development area at Glen Echo Park will not exceed 40% of the entire 9.3- acre park. Presently, nearly all income generating facilities are now fully used and programmed and those facilities have been built out to the maximum degree allowed under the Management Plan. NPS partners would like to activate additional spaces to meet programming demands and generate additional operating income to be further invested in facility maintenance. NPS sees this plan as an opportunity to comprehensively assess land use and facility capacity across the entire site. This assessment will inform future approval of individual repair and rehabilitation projects, ensuring they align with financial realities and government authority limitations on development.

Please note that the purpose of this project is strictly limited to identifying potential areas for development and assessing the effects of expanded development within Glen Echo Park, ultimately resulting in an amendment to the 2001 Management Plan. This undertaking does not include any type of design or construction work; those will occur at a later date and will undergo Section 106 review separately. Furthermore, the buildable zones identified in this project will not be programmed for specific uses; this will also occur in future projects.

NPS is currently developing alternatives to meet the goals of the project. In November we will host an agency briefing to present these alternatives to the Maryland Historical Trust and the National Capital Planning Commission. We look forward to discussing this project with you and receiving your feedback.

Should you have any questions regarding this undertaking, please contact Megan Bailey, GWMP Cultural Resources Program Manager, at megan_bailey@nps.gov or 202-438-6641.

Thank you for your continued assistance.

Sincerely,

**CHRISTINE
SMITH**

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CHRISTINE SMITH
Date: 2024.09.20 15:41:01
-04'00'

Christine Smith
Acting Superintendent

[EXTERNAL] Glen Echo Park Management Plan

From Becky Roman -MDP- <becky.roman@maryland.gov>

Date Tue 10/8/2024 1:58 PM

To Bailey, Megan M <megan_bailey@nps.gov>

Cc Beth Cole -MDP- <beth.cole@maryland.gov>; Smith, Christine M <Christine_Smith@nps.gov>

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Megan Bailey
Cultural Resources Program Manager
NPS - George Washington Memorial Parkway

Good afternoon Megan,

Thank you for your recent submission initiating Section 106 consultation for the above referenced undertaking, involving amending the Management Plan for Glen Echo Park, a unit of the GWMP. The plan amendment is needed to provide additional space for additional arts programming at the park, improve accessibility, circulation and wayfinding throughout the park, and implement best management practices for stormwater control at the park.

Please let us know if you have any questions. We look forward to hearing more details on the alternatives under consideration at a virtual meeting planned for later this year.

Have a great rest of your week,
Becky



Becky Roman *(she, her, hers)*

Preservation Officer / Architectural Historian

Project Review and Compliance

Maryland Historical Trust

Maryland Department of Planning

100 Community Place, 3rd Floor, Crownsville, MD 21032

becky.roman@maryland.gov (410) 697-9587

Mht.maryland.gov



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

January 29, 2026

Ms. Elizabeth Hughes
State Historic Preservation Office
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, MD 21032

Attn: Dr. Dixie Henry, Ms. Becky Roman

Dear Ms. Hughes:

The National Park Service (NPS), George Washington Memorial Parkway (GWMP), is writing to continue consultation under Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) for the Glen Echo Park Management Plan Amendment and to provide formal notification of the NPS determination of effect for this undertaking.

Description of the Undertaking

The proposed project consists of amending the 2001 Management Plan for Glen Echo Park (the Park) in Montgomery County, Maryland, in order to develop additional programmed spaces and visitor services within the park. The 2001 Management Plan/Environmental Impact Statement stated that the development area at Glen Echo Park will not exceed 40% of the entire park. Currently, nearly all income-generating facilities are now fully used and programmed, and those facilities have been built out to the maximum degree allowed under the Management Plan. The proposed Management Plan Amendment (Plan) would identify areas within the Park for new development (e.g., buildings, structures, and associated pathways or other impervious surfaces). Some existing buildings and structures would be removed. Pedestrian access routes would be improved to comply with the Architectural Barriers Act and Section 504 of the Rehabilitation Act. Stormwater management improvements would also be made throughout the site. While the Plan would identify buildable zones for potential future development, it will not authorize the construction or installation of structures, nor will it determine specific building locations, square footage, massing, height, or architectural style. A complete description of the proposed plan can be found in the attached Environmental Assessment.

Area of Potential Effects (APE)

The APE (Figure 1, Figure 2) consists of an approximately 20.5-acre site located approximately seven-

and-a-half miles northwest of Washington, DC in Glen Echo, Maryland, which is in Montgomery County. The project area includes the approximately nine-acre Glen Echo Park, a permit parking lot between Glen Echo Park and MacArthur Boulevard, and a portion of the Clara Barton National Historic Site. The portion of the Clara Barton National Historic Site within the project area is a parking lot area shared between the Clara Barton National Historic Site and Glen Echo Park. The project area is bordered by the Clara Barton Parkway to the southwest; the Clara Barton House and residential communities to the northwest, MacArthur Boulevard to the northeast; and Tulane Avenue businesses to the southeast.

Identification of Historic Properties

The NPS identified several historic properties within the APE (Figure 3), including historic districts and individually listed historic properties that have been listed in the National Register of Historic Places. Historic properties within the APE include the following:

- Glen Echo Amusement Park Historic District
- Chautauqua Tower
- Carousel at Glen Echo Park
- Clara Barton House National Historic Site
- Chesapeake and Ohio Canal National Historical Park Historic District
- Washington Aqueduct
- George Washington Memorial Parkway (including the Clara Barton Parkway) Historic District

Assessment of Effect

NPS has determined the Glen Echo Park Management Plan Amendment will result in No Adverse Effect to historic properties, as defined under 36 CFR § 800.5(b). This determination is appropriate because the Plan is administrative and programmatic in nature and does not authorize the installation, construction, or physical alteration of any infrastructure at this time. Instead, it establishes a framework for the development of Glen Echo Park to address programmatic and visitor service needs. When the NPS determines, it is prepared to move forward with implementation of a specific design, the NPS will initiate a separate, project-level Section 106 consultation. This additional consultation will evaluate the proposed construction's potential effects on historic properties and cultural landscapes within the Area of Potential Effects. At that time, the NPS will review the design, consider alternatives and modifications, and consult with the MD SHPO, federally recognized Tribes, the National Capital Planning Commission, and other consulting parties as appropriate. This process will allow the NPS to avoid, minimize, or resolve any potential adverse effects before approving construction. Accordingly, while this plan-level determination concludes that adoption of the plan results in No Adverse Effect, it does not authorize construction and does not eliminate the need for consultation on specific undertakings that may result from the plan.

The NPS respectfully requests your concurrence with this finding of No Adverse Effect for the Glen Echo Park Management Plan Amendment. This determination applies solely to the approval of the plan itself and does not authorize construction or physical implementation of site development. We acknowledge that future, site-specific proposals developed under this plan will require separate Section 106 consultations, including the opportunity to evaluate potential effects, consider alternatives, and modify designs as appropriate.

Should you have any questions regarding this undertaking, please contact Megan Bailey, GWMP Cultural Resources Program Manager, at megan_bailey@nps.gov or 202-438-6641.
Thank you for your continued assistance.

Sincerely,

JENNIFER
MADELLO
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JENNIFER MADELLO
Date: 2026.01.29
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Jennifer Madello
Superintendent, George Washington Memorial Parkway

Figure 1: Project Area Context



Figure 2: Project Area of Potential Effects

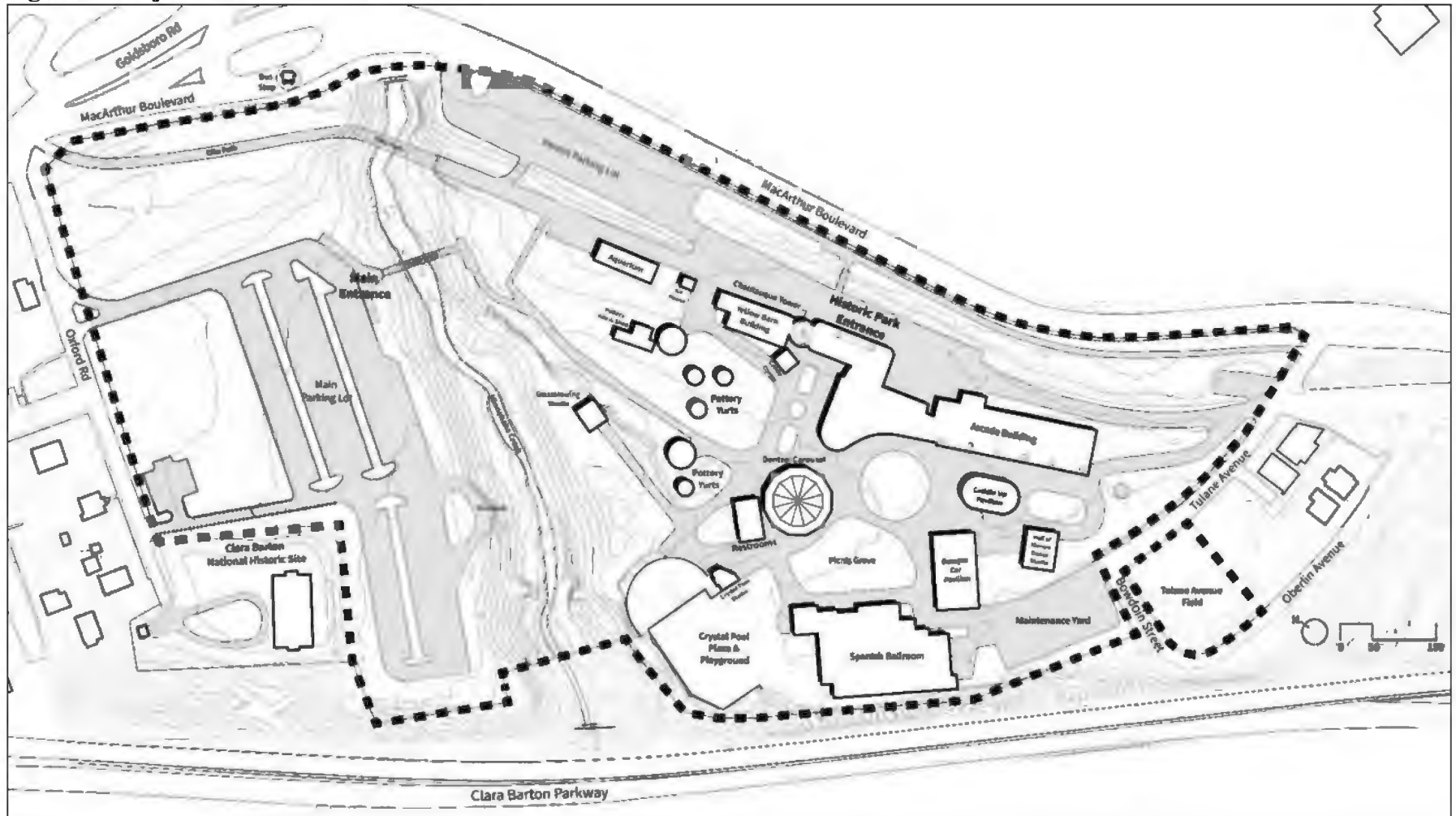


Figure 3: Historic Properties within the Area of Potential Effect



[EXTERNAL] MHT e106 project review – MHT Completed Comments

From Maryland Historical Trust <donotreply@maryland.gov>

Date Tue 2/24/2026 12:43 PM

To Bailey, Megan M <megan_bailey@nps.gov>

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Date: February 24, 2026

To: Megan Bailey
National Park Service

Project Name: Glen Echo Park Management Plan Amendment/Environmental Assessment

County: Montgomery County

Agency: National Park Service

Second Agency: -- Not noted --

MHT Log #: 202600394

MHT Response: Thank you for providing the Maryland Historical Trust the opportunity to comment on the above-referenced undertaking using the MHT e106 system. The Maryland Historical Trust has reviewed the submitted project for its effects on historic and archeological resources, pursuant to Section 106 of the National Historic Preservation Act of 1966 and/or the Maryland Historical Trust Act of 1985. We offer the following comments and/or concurrence with the agency's findings:

The undertaking will have no adverse effect on historic properties. Additional consultation with our office may be required if there are any significant changes in project scope or location.

MHT concurs with the NPS that the Plan will have no adverse effect on historic properties. We have no comments on the Management Plan or EA. We look forward to working with GWMP staff on future consultation for work at Glen Echo Park. Please let us know if we need to provide this statement in PEPC. Thanks, Becky

Thank you for your cooperation in this review process. Since the MHT response is now complete, this response will appear in the Completed section of your project dashboard. No hard copy of this response or attachments will be sent. If you have questions, please contact the following MHT project reviewers:

Becky Roman becky.roman@maryland.gov

Dixie Henry dixie.henry@maryland.gov



Maryland Historical Trust
Project Review and Compliance
100 Community Place
Crownsville, MD 21032
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