

**JONES POINT PARK
FINDING OF NO SIGNIFICANT IMPACT**

Woodrow Wilson Bridge Replacement Project

November 2007

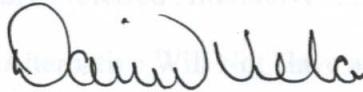
National Park Service
George Washington Memorial Parkway

As summarized in the following document, the nature of comments from agencies and the public, and the incorporation of mitigation measures to avoid or reduce potential direct, indirect, and cumulative impacts, it is the determination of the National Park Service that the Selected Alternative, Alternative 4A, is not a major federal action that would significantly affect the quality of the human environment. No long-term adverse impacts to floodplains would occur from the Selected Alternative. The Selected Alternative affects a minor amount of wetlands, including 0.2 acre of tidal emergent wetlands and approximately 0.2 acre of non-tidal forested wetlands.

The National Park Service finds the Selected Alternative to be acceptable under Executive Order 11988 for the protection of floodplains and Executive Order 11990 for the protection of wetlands. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an Environmental Impact Statement will not be prepared.

The Selected Alternative, Alternative 4A, as detailed in this Finding of No Significant Impact (FONSI), and supported by the information contained in the *Jones Point Park Environmental Assessment – Woodrow Wilson Bridge Replacement Project* (June 2007), may be implemented immediately.

Recommended:

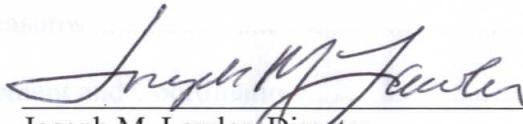


David Vela, Superintendent
George Washington Memorial Parkway

11-14-07

Date

Approved:



Joseph M. Lawler, Director
National Capital Region, NPS

12/3/07

Date

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FINDING OF NO SIGNIFICANT IMPACT

1. PURPOSE AND NEED FOR ACTION

This Finding of No Significant Impact (FONSI) documents the decision of the National Park Service to adopt a plan for the improvement of Jones Point Park (JPP) and the determination that no significant impacts on the quality of the human environment are associated with that decision. JPP is an approximately 65-acre park located in the southeastern corner of the City of Alexandria that is owned by the NPS under the jurisdiction of the George Washington Memorial Parkway. JPP contains many recreational amenities such as multi-use fields, natural areas, a pier used for fishing activities, historic resources, pedestrian trails, and bike paths.

The NPS proposes to improve and enhance JPP. The project includes recreational features, an interpretive plan related to cultural resources, and proposed modifications to parking and access within the park. The elevated Woodrow Wilson Bridge (WWB) traverses JPP. The Federal Highway Administration (FHWA) has approved improvements to the WWB and affected interchanges within a 7½-mile portion of the Capital Beltway (I-95/I-495). The proposed improvements to JPP are mitigation commitments to the NPS from FHWA for impacts to the park from the WWB Replacement Project.

The NPS signed the initial JPP Environmental Assessment on September 10, 2001. Terrorists attacked on September 11, 2001 crashing commercial airplanes into the World Trade Center in New York City, the Pentagon in Washington, D.C., and a field in Pennsylvania. In August 2003, the federal Transportation Security Administration (TSA) performed a vulnerability assessment and recommended the removal of all parking from beneath the new WWB. After careful evaluation of the risks of parking in JPP, a recommendation was set forth to eliminate all parking and vehicular access within 80 feet of the north and south parapet drip lines of the new WWB. There could be an exception for “special event parking” beneath the bridge if additional security measures are instituted.

TSA’s recommendation endorsed by the FHWA and accepted by the Maryland State Highway Administration (MSHA), the Virginia Department of Transportation (VDOT), the City of Alexandria, and the NPS (owner of JPP) has resulted in the need to reassess the parking, access, and security components of the park design. The need for the proposed action is based on:

- The lack of a current comprehensive management plan for JPP.
- Required mitigation commitments for impacts from the WWB Replacement Project (protection of JPP resources and recreational opportunities).

- Required security measures in JPP due to recommendations contained within the *Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project* (June 2002).

The primary purposes of the proposed action are to:

- Develop a long-range plan for JPP.
- Identify desired resource conditions and visitor experiences.
- Consider feasible alternatives for future development of JPP.
- Provide educational and recreational opportunities for visitors while protecting park resources.

2. ALTERNATIVES CONSIDERED OR ANALYZED AND THE SELECTED ALTERNATIVE

The *Jones Point Park Environmental Assessment – Woodrow Wilson Bridge Replacement Project* (JPP EA) was released for public comment in August 2006 and analyzed the potential impacts resulting from the construction of new parking areas, turnaround and access roads, recreational improvements, and perimeter barriers that are proposed in JPP. The JPP EA evaluated four action alternatives and, at that time, identified Alternative 4 as the NPS Preferred Alternative. Since then, the NPS has analyzed the public comments that were received on the JPP EA and has included some of their suggestions in Alternative 4A. The NPS released a revised JPP EA in June 2007 that analyzed Alternative 4A. This document identifies Alternative 4A as the NPS Selected Alternative for improvements to JPP. The following section summarizes the five alternatives considered in the 2007 JPP EA plus Alternative 4A, the NPS Selected Alternative.

The No-Action Alternative

The No-Action Alternative maintains the two existing soccer fields located south of the WWB; therefore, no additional environmental, social, or construction impacts would be expected due to new park improvements. However, the No-Action Alternative does not address the need for improvements in JPP based on:

- The lack of a current comprehensive management plan for JPP.
- Required mitigation commitments for impacts from the WWB Replacement Project (protection of JPP resources and provision of recreational opportunities).
- Required security measures in JPP due to recommendations contained within the *Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project* (June 2002).

The No-Action Alternative does not fulfill the purpose for the project which is to:

- Develop a long-range plan for JPP.
- Identify desired resource conditions and visitor experiences.
- Consider feasible alternatives for future development of JPP.
- Provide educational and recreational opportunities for visitors while protecting park resources.

The No-Action Alternative does not comply with the NPS 1984 *Development Concept Plan* that outlined specific park improvements for expanded use and enjoyment of the park. The *Development Concept Plan* indicated that park improvements would be directed toward fulfilling the following overall goals:

- Provide expanded recreational opportunities for all citizens.
- Improve the quality of recreational opportunities for all citizens.
- Provide for the safety and security of all park visitors.
- Provide an opportunity for exploring the natural and historic environment of the park.

On February 9, 1999, the Alexandria City Council adopted Resolution No. 1908 that stipulated, in part, that the redevelopment of JPP would be in accordance with specific design programs developed by staff of the City of Alexandria Department of Planning and Zoning. The City Council referred to design programs such as *Design Guidelines for Jones Point Park and the Urban Deck* (City of Alexandria, December 1998) and *Historic Context and Recreation Issues for Jones Point Park, the George Washington Memorial Parkway and Urban Deck* (City of Alexandria, January 1999) that recommended replacing the two soccer fields, though not necessarily in the present location, as the bridge expands to the south.

To ensure that all improvements are aesthetically and ecologically compatible with the natural, historic and recreational resources of the park, extensive coordination has occurred between the NPS, the City of Alexandria, and the FHWA to further develop the mitigation and enhancement plan for JPP. The JPP Development Group comprised of the NPS, City of Alexandria, and other stakeholders recommended a number of key design and programmatic goals and objectives for JPP regarding cultural and natural areas, security, recreation, and circulation in the park. The No-Action Alternative does not address the Resolution adopted by the Alexandria City Council or the park program and design elements recommended by the JPP Development Group.

The 1997 Memorandum of Agreement (MOA) among the Federal Highway Administration, National Park Service, Advisory Council on Historic Preservation, District of Columbia State Historic Preservation Officer, Maryland State Historic Preservation Officer and the Virginia State Historic Preservation Officer contained

mitigation measures that lessen the potential adverse effects on cultural, historic and archeological resources due to the WWB Replacement Project. The No-Action Alternative does not fulfill the conditions in the MOA which specifically stated that “in consultation with the NPS, the State Historic Preservation Office (SHPO), and the City of Alexandria, the FHWA shall provide improvements within JPP to aid in the recognition of the historic past of the park and implement measures to preserve historic resources within the park.” These measures include appropriate improvements that convey the historic past of JPP, interpretations of historic activities/sites, stabilization, preservation and interpretation of the Virginia Shipbuilding Corporation (VSC) Site, restoration of the Jones Point Lighthouse and D.C. South Cornerstone, and other conditions.

The No-Action Alternative does not meet the following design goals contained in the Federal Highway Administration *Record of Decision for the Woodrow Wilson Bridge Project* (ROD) which identified enhancements to JPP to mitigate impacts from the WWB Replacement Project. In particular, the No-Action Alternative does not:

- Realign and improve the entrance drive to the park.
- Reconfigure the parking area.
- Include park improvements such as shoreline stabilization, historic preservation/interpretation, paved and unpaved trails, and other amenities.

Finally, the No-Action Alternative does not address TSA’s security recommendation to remove all parking from beneath the new WWB.

For the reasons stated above, the No-Action Alternative is not being carried forward for improvements to JPP but was used as a baseline against which the action alternatives were compared for purposes of assessing environmental and community impacts.

Items Common to All Action Alternatives

All action alternatives have the following items in common:

- Vehicle access to the park would occur from Royal Street, which will end in a turn-around. All alternatives include an access road that connects to the proposed parking areas in JPP (the access road length varies with each action alternative). All public vehicle access and parking areas under the existing WWB would be removed and the area beneath the new WWB is proposed to be treated with a paved or some other type of impervious surface.
- Parking areas and access to recreational facilities (including fishing areas and the Mt. Vernon Trail) will be evaluated, during final design, for compliance with the Americans with Disabilities Act (ADA) and adherence to current ADA regulations.
- A guardhouse/gate would be located in the vicinity of Royal Street to ensure that, during special events, vehicles can be monitored entering and exiting within 80 feet of the new WWB.

- Based on the current security measures implemented at other NPS properties, each action alternative could use a combination of elements for the perimeter barriers including decorative fencing, a “ha-ha” wall (depressed wall with slope), masonry piers, bollards (stationery and retractable), and landscape plantings.
- A perimeter barrier would be required south of the WWB, adjacent to the Hunting Towers parking lot circulation road. This perimeter barrier would be constructed outside of the parking lot circulation road and parallel to the 80-foot distance measured from the north and south parapet drip lines of the new WWB. The perimeter barrier would then terminate at the existing boardwalk on the south side of the bridge.
- Proposed shoreline stabilization, bulkhead, tot lot, park manager’s office/comfort station, canoe/kayak launch, fishing pier, promenade/boardwalk, access road, and drainage improvements.
- Under all action alternatives, the current finishing pier would be changed to a promenade/boardwalk. Although the potential conversion of the finishing pier to a promenade/boardwalk would not prevent its use for fishing activities, two fishing piers would be provided within 200 feet of the existing fishing area, along the southeastern edge of the park. Access to fishing opportunities would be improved as the pedestrian paths and fishing piers would be designed to comply with current ADA regulations.
- Proposed drainage improvements consist of upgrading existing culverts and installing a new culvert between the existing culverts, under the proposed access road. All of the action alternatives would increase the storm water runoff in the park as the drainage area to the culverts would be increased in size and contain more impervious area. However, the drainage improvements would expand the capacity of the storm drainage system to handle storm water runoff and reduce the potential flooding of roads. Appropriate drainage enhancements will be considered for the multi-use fields.
- Access to the recycling center would be maintained and relocated to the new end of Royal Street.
- The Mt. Vernon Trail will remain a paved surface and connect to the new end of Royal Street. All other trails at this site would be paved or gravel pathways.
- In accordance with the MOA, the Jones Point Lighthouse would undergo rehabilitation of its exterior façade, including replacement of missing exterior features, repair of the exposed structural system within its interior, and the correction of earlier projects that were previously undertaken without adherence to appropriate historic preservation standards. All work would be performed to minimize potential impacts to archeological resources.
- The D.C. South Cornerstone would be stabilized in accordance with the MOA. The concrete vault enclosure surrounding the cornerstone would be redesigned and replaced to keep water out of the vault and to protect the cornerstone while

improving its visibility from the lighthouse yard above. Also, the retaining wall surrounding the cornerstone and lighthouse yard would be stabilized and rebuilt so that the wall and its historic appearance are restored and the lighthouse and cornerstone are provided improved long-term protection from invasive water. Limited elements of the historic beach would be rebuilt to improve interpretation of the entire site. Efforts will be made to re-establish native wetlands within the inner zone between the rocky bulkhead and the historic stone retaining wall. All work would be performed to minimize potential impacts to archeological resources.

- The Jones Point Lighthouse and D.C. South Cornerstone areas would be made physically accessible in accordance with the Architectural Barriers Act of 1968, the Americans with Disabilities Act of 1990, and the MOA.
- The area south of the WWB would be upgraded to increase cultural resource education and preservation, to facilitate management and protection of cultural resources, and to interpret local archeology and history to the public.
- The VSC Site would be enhanced and interpreted in accordance with the MOA and a January 2001 WWB Replacement Project treatment plan. Specifically, certain remaining elements of the VSC Site – one of the shipways and the finishing pier – are being retained and interpreted for the public as part of the overall park interpretation plan.
- Ground disturbance in known archeological sites would be avoided in accordance with the MOA and the September 2002 JPP Archaeological Preservation Plan.
- Efforts would be made to protect existing forested areas, especially large trees. Maintaining a tree canopy is important particularly for the Forest Interior Dwelling Species (FIDS) that were identified in the *Final Supplemental Jones Point Park Consolidated Natural Resources Inventory* (2000), which was completed as part of the WWB Final Supplemental Environmental Impact Statement (FSEIS).
- On-site wetland mitigation and tree loss replacement would be provided. Tree loss would be mitigated through additional plantings of native species. Wetland mitigation would occur at a 1:1 replacement rate.
- Jones Point Park Drive was closed in May 2006 after the opening of the WWB Outer Loop. Demolition of the existing bridge will require that access to Jones Point Park Drive only be available to the contractor and emergency equipment and personnel. Access to the southern part of the park would remain open to the public at all times.

Alternative 1 (*Alexandria City Council's "Scheme A" dated 6/28/05*)

Alternative 1 features access from Royal Street with two entry points leading to three parking areas. A total of 110 parking spaces would be located in the park between Royal Street and Lee Street, north of the new WWB. No additional event parking would be provided under the WWB.

Visitors would enter JPP from Royal Street, via an access road located approximately 85 feet north of the 80-foot distance surrounding the WWB. A short entry drive, located approximately 50 feet south of the turnaround, would lead to a 26-space parking area. Another entry drive, located east of the turnaround, would lead to a second parking area. One parking area would accommodate 46 parking spaces and be located along the access road, approximately 90 feet south of the Royal Street community garden. The access road would continue further for approximately 120 feet to a 38-space parking area, located east of the existing wetlands and west of the Lee Street pathway.

The existing soccer fields located south of the existing WWB would be replaced with multi-use fields on the north side of the bridge. One multi-use field would be located parallel to the WWB and a second multi-use field would be placed perpendicular to the WWB, east of the first multi-use field. The westernmost multi-use field would be oriented in an east-west direction while the adjacent multi-use field would be oriented in a north-south direction. A tot lot would be sited east of the easternmost multi-use field. The tot lot would be landscaped with additional trees and plantings located between the easternmost multi-use field and the Mt. Vernon Trail.

Alternative 2 (*VDOT "Access Option 5" dated 9/28/04*)

Alternative 2 features access from Royal Street and an access road that extends to the Potomac River and terminates at a parking area just west of the Mt. Vernon Trail. A 38-space parking area would be built on the west side of the westernmost multi-use field and a 72-space parking area would be built on the east end of the easternmost field.

The existing soccer fields would be relocated north of the WWB. Two multi-use fields, located east of the parking area, would be oriented east-west, parallel to the WWB. The westernmost field would require clearing a partially forested area, while the easternmost field would be located in an existing open area.

A turnaround and 130 additional parking spaces would be located under the WWB to supplement public vehicle access and parking during special events (a total 240 parking spaces available for regular and special events). The 130 parking spaces under the WWB would only be accessible during special events and would require additional on-site security personnel.

Alternative 3 *(Based on "Alternative 2" from JPP EA dated 9/10/01)*

Alternative 3 features access from Royal Street by a roadway extending east of Lee Street. The access road would run south of the Royal Street community garden and shift south, ending west of the multi-use field. The access road would connect to a 50-space parking area south of the road and the 60-space parking area, located approximately 30 feet west of the multi-use field.

A single 110 x 60 yard multi-use field would be located east of the proposed 60-space parking area, located north of and oriented parallel to the WWB. A tot lot would be sited east of this multi-use field, north of the WWB. The tot lot would be landscaped with additional trees and plantings between the northern multi-use field and the Mt. Vernon Trail.

A reconfigured soccer field would remain in its existing location south of the WWB. This multi-use field, proposed to be 80 x 40 yards, would be oriented diagonally in a northwest/southeast direction. A turnaround and 130 additional parking spaces would be located under the WWB to supplement public vehicle access and parking during special events (a total 240 parking spaces available for regular and special events). The 130 parking spaces under the WWB would only be accessible during special events and would require additional on-site security personnel.

Alternative 4 *(One multi-use field south of the WWB)*

Alternative 4 features access from Royal Street via an access road extending to an 81-space parking area located just west of the Potomac River. The 81-space parking area would have the same footprint as the existing interim parking area with the access road connecting from a new turnaround at Royal Street.

A reconfigured soccer field would remain in its existing location south of the WWB. One multi-use field, located in a similar location as the current field, would be oriented in a northwest/southeast direction. The field would be 80 x 40 yards. A turnaround and 159 additional parking spaces would be located under the WWB to supplement public vehicle access and parking during special events (a total 240 parking spaces available for regular and special events). The 159 parking spaces under the WWB would only be accessible during special events and would require additional on-site security personnel.

Alternative 4A – NPS Selected Alternative *(Multi-use fields north and south of the WWB)*

Alternative 4A features an access road that connects with a new turnaround at Royal Street and extends to a linear 95-space parking area located just west of the Potomac River. The turnaround, perimeter barrier system, guardhouse/gate, and landscape plantings to be located just south of the turnaround, would be similar to Alternative 4.

From the turnaround, motorists would be able to reach the parking area via the access road. The access road would be similar in location and length to Alternative 4, and

would require extending the Lee Street community garden north to keep it the same size as the original garden.

A tot-lot and an 80 x 40 yard multi-use field would be located north of the parking area and a 110 x 60 yard multi-use field would be located south of the WWB in a similar location as the existing field. A vehicle turnaround and 159 additional parking spaces to be located under the WWB, the landscape plantings, the perimeter barrier system, and connection to the Mt. Vernon Trail would be similar to Alternative 4.

3. THE ENVIRONMENTALLY PREFERRED ALTERNATIVE

The NPS is required to identify the “environmentally preferred alternative” in accordance with NPS Director’s Order 12 (2001). The Council on Environmental Quality provides guidance for determining the environmentally preferred alternative by applying the criteria suggested in the National Environmental Policy Act of 1969. Although the NPS is required to identify the “environmentally preferred alternative”, there is no requirement that the environmentally preferred alternative and the selected alternative be the same.

The Council on Environmental Quality indicates that “the environmental preferable alternative” is the alternative that will promote the National Environmental Policy as expressed in Section 101 of the National Environmental Policy Act, which considers:

- Fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assuring for all generations safe, healthful, productive and aesthetically and culturally pleasing surroundings;
- Attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserving important historic, cultural and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieving a balance between population and resource use that will permit high standards of living and a wide sharing of life’s amenities; and
- Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources (National Environmental Policy Act, Section 101).

After completing the environmental analysis, the NPS identified the environmentally preferred alternative as Alternative 4, however, it would have only slightly less impacts compared to Alternative 4A. The difference between Alternative 4 and the Selected Alternative 4A are limited to forested areas, community gardens and visual resources. Alternative 4 would have only 0.2 acres less impacts to forested areas compared with

Alternative 4A (2.7 acres versus 2.9 acres). This is equivalent to 8,712 square feet (0.2 acre) or approximately a 100-foot by 87 foot area. The forested area that will be impacted is mostly comprised of invasive exotic species in a patch of forest that is highly impacted already, and will be mitigated with a 1:1 replacement ratio.

Alternative 4 would impact 1,306 square feet (0.03 acres) of the uncultivated portion of the Lee Street community garden versus Alternative 4A which will impact the cultivated portion of the garden 404 square feet (0.0093 acres). However, the Lee Street community garden property would be reconfigured and extended north to maintain the same amount of land available for public gardening activities.

Visual effects are minor under Alternative 4 versus moderate under Alternative 4A due to the placement of the multi-use fields. Alternative 4 and Alternative 4A have similar benefits and fulfill all of the above criteria. The NPS feels that Alternative 4A best meets overall purpose, need and objectives, minimizes adverse impacts to park resources and adjacent neighborhoods, and provides the best balance of recreational opportunities, thereby, justifying the slight increase in impacts to forested areas, visual environment, and the community garden.

4. WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

The Selected Alternative (Alternative 4A) will not have a significant effect on the environment as defined in 40 CFR §1508.27. Significance is determined by examining the following criteria:

- *Impacts that may be both beneficial and adverse. A significant effect may exist even if the federal agency believes that on balance the effect will be beneficial.*

The Selected Alternative will have an adverse, short-term, major impact on utilities due to the construction and/or relocation of systems to accommodate park improvements. However, the addition of new utility systems for water, sewer, phone, and electricity will be beneficial. The Selected Alternative will minimize adverse effects on natural, social, and cultural resources by avoiding the location of park improvements in environmentally sensitive areas. The Selected Alternative will have a minor (or negligible), adverse, site-specific (or local) impact on community facilities, visual conditions, visitor use/experience, soils, wetlands, vegetation, terrestrial habitats/wildlife, and noise. The Selected Alternative will have a major, beneficial, local effect on cultural resources and storm water flow in JPP and a moderate, beneficial, site-specific effect on safety and security. All park users would benefit from improved recreational facilities.

- *The degree to which the proposed action affects public health or safety.*

The Selected Alternative will increase public safety and security by providing perimeter barriers that will prevent unauthorized vehicles from entering within

an 80-foot distance surrounding the WWB. Impacts will be beneficial, site-specific, and moderate.

- *Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.*

No unique prime farmlands, wild and scenic rivers, or ecologically critical areas were identified during the preparation of the JPP EA or during the public review period. The project is located in JPP which has a number of historic and archaeological resources including the Jones Point Lighthouse, the D.C. South Cornerstone, the VSC Site, and prehistoric remains in addition to the surrounding Alexandria National Historic Landmark Historic District and the Alexandria National Register Historic District. The Selected Alternative will have a long-term, beneficial effect on historic properties due to the restoration and preservation of the Jones Point Lighthouse and D.C. South Cornerstone and the stabilization of the VSC Site shipways that would reduce the likelihood of continued damage to these resources over time. There would be no effect to archeological resources due to mitigation efforts that will protect sensitive archeological areas by not disturbing but rather placing a clean fill layer over top of the buried resource. Improvements to JPP will include plans for design and construction of various components, which will undergo additional Section 106 review. The Selected Alternative will have negligible impact on the Alexandria National Historic Landmark Historic District and the Alexandria National Register Historic District.

- *The degree to which the effects on the quality of the human environment is likely to be highly controversial.*

The project effects on the quality of human environment are not highly controversial but some members of the public disagree on the amount and location of multi-use fields and parking. Comments on the JPP EA primarily reflected concerns with the location and amount of active and passive recreational uses in JPP; the potential effects from the action alternatives on the adjacent neighborhood (which has been impacted by the WWB Replacement Project); maintaining, to the maximum extent possible, the natural forest and wetland buffers that could possibly control potential flooding from the Potomac River; and potential visual and natural environmental effects.

The Selected Alternative responds to public comments and concerns by locating park improvements (fields, access, and parking) north of the WWB but as far away as possible from adjacent neighborhoods in order to maximize the amount of buffer, and reduce noise and visual impacts on the adjacent community from associated active park uses and bridge related impacts.

The selected alternative will impact approximately 2.9 acres of the forested area of Jones Point Park. Reforestation mitigation of approximately 0.7 acres is

feasible at Jones Point Park. To meet the NPS requirement to replace loss of forested land at a 1:1 ratio, the park would investigate other parklands within the George Washington Memorial Parkway for potential off-site reforestation (up to 2.2 acres), however, other areas within the park that are not currently forested or proposed for some other park activity will be assessed for potential use as reforestation during design and construction. It is standard practice within the NPS to provide for on-site mitigation to the maximum extent possible, and this will apply for the developments at JPP. The EA contained an analysis that considered maximum spatial arrangements for improvements and impacts to resources. When possible, efforts will be made during design and construction to protect as many existing trees as possible, especially along the access road where forest impacts are expected. Furthermore, the NPS is committed to providing reforestation in areas along the access road and other areas to the extent possible to maximize the existing vegetative buffer that protects the adjacent community from noise and visual impacts.

Some members of the public believe that improvements to JPP will increase the potential for flooding in adjacent neighborhoods. Alternative 4A will install new features that will improve drainage and storm water runoff. Mitigation includes 0.5 acres of wetlands replacement (for 0.4 acres of wetland impacts) that will maintain resources very similar to what exists currently. As a response to public comments, the multi-use fields will not be constructed on a raised grade. Although it will be necessary to bring in some fill to adequately grade the field surface for drainage, the proposed fields would remain as close to existing elevations as possible, and would not impede water flow especially during a flood event.

Some members of the public stated concerns regarding increased traffic on local streets that could result from JPP improvements. Prior to construction activities to replace the existing WWB, Royal Street was continuous south of Green Street, under the WWB, where it intersected with South Street at the south side of the bridge. Approximately 3,500 to 4,000 vehicles per day used the South Street connector to Royal Street, which brought substantial traffic into the neighborhood just north of JPP. This street connection will no longer exist due to the widening of I-95, which included the reconfiguration of Washington Street and complete reconstruction of access and parking for the remaining Hunting Towers/Terrace Complex and the acceptance of WWB security measures. The elimination of the connection between South Street and Royal Street removes the traffic that previously used local streets. In comparison, the JPP improvements could generate 190 vehicles per hour on local streets between scheduled soccer games but will provide a Level of Service (LOS) for local street traffic that would remain reasonably free flowing.

This document acknowledges the issues highlighted through citizen comments and supports the proposed action to minimize, as much as possible, the potential effects of improvements to JPP. Although both supporting and dissenting

comments were received, the NPS has considered all of the comments and has determined that the Selected Alternative does not significantly affect the quality of the human environment based on its protection of environmental and cultural resources, a balanced range of beneficial uses without degradation, and benefits to visitor use and experience.

- *The degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks.*

There were no highly uncertain, unique, or unknown risks identified during either preparation of the JPP EA or during the public review period.

- *The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.*

The Alternative 4A neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

- *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.*

Cumulative effects were analyzed in the JPP EA, and no significant cumulative impacts were identified that were attributable to the *Jones Point Park Improvement Plan*.

- *The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.*

Alternative 4A will have an adverse, short-term, minor effect on historic resources within the park during the construction phase of the project, due to the need to make minor changes to the land surface. During the construction phase, portions of the park containing historic resources would be closed to the public. However, Alternative 4A will benefit and preserve important historic, cultural, and natural resources by rehabilitating the exterior façade of the Jones Point Lighthouse including replacement of missing exterior features, repair of the exposed structural system within its interior, and the correction of earlier projects that were previously undertaken without adherence to appropriate historic preservation standards. The D.C. South Cornerstone will be stabilized and the concrete vault enclosure surrounding the cornerstone will be redesigned and replaced to keep water out of the vault and to protect the cornerstone while improving its visibility from the lighthouse yard above. Also, the retaining wall surrounding the cornerstone and lighthouse yard will be stabilized and rebuilt so that the wall and its historic appearance are restored and the lighthouse and cornerstone are provided improved long-term protection from invasive water action. All work will be completed in accordance with the *Secretary of the*

Interior's Standards for the Treatment of Historic Properties and performed with care to minimize potential impacts to archeological resources. The improved condition of the Jones Point Lighthouse and D.C. South Cornerstone will reduce the likelihood of continued damage to these resources over time.

Alternative 4A will have no adverse effect on the surrounding Alexandria National Historic Landmark Historic District and the Alexandria National Register Historic District.

- *The degree to which the action may adversely affect an endangered or threatened species or its critical habitat.*

Except for the occasional occurrence of transient species, no federal- or state-listed species of plant or wildlife is known to occur within JPP. The U.S. Fish and Wildlife Service, Virginia Department of Conservation and Recreation, Virginia Department of Game and Inland Fisheries, and Virginia Department of Agriculture and Consumer Services were contacted regarding the presence of rare, threatened, and endangered species in JPP. According to records of these agencies, no such species have been identified in JPP and no rare, threatened or endangered species were observed during fieldwork in JPP.

- *Whether the action threatens a violation of federal, state, or local environmental protection law.*

Alternative 4A does not violate federal, state or local environmental protection laws.

5. NON-IMPAIRMENT OF PARK RESOURCES

The NPS has determined that implementation of Alternative 4A and mitigation measures will not impair the resources and values of the George Washington Memorial Parkway (GWMP). There would be no major adverse impacts to a resource or value whose conservation is 1) necessary to fulfill specific purposes identified in the park's establishing legislation; 2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or 3) identified as a goal in the park's relevant NPS planning documents. This conclusion is based on a thorough analysis of the environmental impacts described in JPP EA, the mitigation measures, agency consultations, considerations of the public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies 2006*.

6. MITIGATION MEASURES

The project will avoid, minimize, and mitigate potential impacts to natural and social environments, and cultural resources to the extent practicable. The following mitigation

measures have been incorporated into the project to protect natural, social, and cultural resources:

- Institute the recommendations contained in the 2000 Record of Decision including those in the Table of Commitments to mitigate the potential impacts of the WWB Replacement Project.
- Provide a 1:1 replacement of wetlands on-site.
- Provide a 1:1 replacement of forest habitat on site. Tree loss will be replaced in-kind incorporating appropriate plantings of native species of trees, shrubs, and herbs.
- Treat invasive species that threaten the remainder of the forest within the park.
- Maintain the tree buffer between the vehicle access road in the park and the Yates Gardens neighborhood to reduce potential visual and noise effects.
- Reconfigure and extend the Lee Street community garden north to maintain the same amount of land available for public gardening.
- Schedule construction during times of low usage of the park and during least disruptive hours. Provide secondary access during construction.
- Facilitate pedestrian and vehicle movements during construction using temporary paths to and through the area and detour/guide signs.
- Institute public information programs to advise area residents and park patrons of the timeframe for construction activities. Notification will occur through press releases; notices on the NPS, City of Alexandria, and WWB Replacement Project websites; and posted signs at the park. The NPS will continue public involvement activities throughout planning and design activities.
- Use materials and styles of perimeter barriers that complement the character of the park, and landscaping enclosures, as appropriate.
- Maintain public access to the Mt. Vernon Trail during construction of the park improvements. The recreation fields, fishing areas, and other park resources will remain open to the extent that they can maintain safe conditions during construction of the improvements. The design concept plan provides temporary parking at Hunting Towers until a permanent parking area is constructed north of the WWB.
- Complete construction activities in accordance with the Archeological Treatment Plan for the site. Avoid construction activities, including staging, in areas determined to have high archeological potential.
- Erect fencing to delineate sensitive areas and protect them from any inadvertent impacts during construction.
- As discussed in the Archeological Treatment Plan, place clean fill on top of archeological sites for long-term preservation.

- Complete all rehabilitation and preservation work at the Jones Point Lighthouse and D.C. South Cornerstone in accordance with the park interpretation plan for the site, using compatible construction materials, and completed in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- Institute mitigation measures with regard to historic properties and archeological resources that are contained within the 1997 MOA for the WWB Replacement Project (which includes JPP). Coordination will continue with the SHPO and interested parties to complete the stipulations in the MOA with regard to cultural resources.
- Any significant modifications to utilities will be reviewed under the existing 2002 Jones Point Archaeological Preservation Plan which established a system to identify, assess, and propose treatments for any impacts to cultural resources. The preservation plan clearly notes that specific actions that may affect significant archaeological resources include the following:
 - Placement of utilities
 - Placement of walkways/paths that require subsurface excavation
 - Installation of irrigation systems
 - Plantings
 - Construction of buildings of any kind, and
 - Placement of fill (for VSC site).
- Continue coordination with the City of Alexandria, JPP Stakeholder Participation Panel, regional and state government agencies; technical consultants; and the general public during subsequent design activities to create a park that fulfills the development goals for JPP.

7. PUBLIC INVOLVEMENT AND COORDINATION

The NPS places a high priority on meeting the intent of public involvement in the NEPA process and giving the public an opportunity to comment on proposed actions. An extensive agency coordination and public involvement program, established during the WWB Replacement Project, was continued during planning activities for JPP. This FONSI reflects the suggestions and comments received through these public involvement activities.

The table below lists the opportunities for public input in the planning process. The planning process included the JPP Stakeholder Participation Panel's recommendation to the City and the NPS that parking and access concepts be presented in the EA. At the same time, the City of Alexandria's Neighborhood Task Force for the WWB Replacement Project and the Yates Gardens Civic Association considered the concepts and provided their own recommendations to the City and NPS. In July 2005, the Alexandria City Council held a public hearing and voted to support an action alternative

that accommodates two multi-use fields on the north side of the WWB and 110 parking spaces between Royal Street and Lee Street.

The NPS published a JPP EA in August 2006 which contained four action alternatives that addressed the recommendations received at that time. On August 18, 2006, the NPS distributed the JPP EA for a 60-day public review and comment period with an October 18, 2006 deadline for comments. The EA was made available for public review through PEPC, individual mailings, by request, and paper copies of the document, which were placed in local libraries, at the GWMP Headquarters, and the offices of Potomac Crossing Consultants.

The NPS held a public hearing on September 13, 2006 from 6:00 p.m. to 8:00 p.m. at the Old Town Radisson Hotel in Alexandria, VA. The purpose of the public hearing was to solicit public comments on the JPP EA and to give citizens the opportunity to provide their comments to the new GWMP Superintendent, who had recently assumed his current position. The public hearing followed a prescribed format, with the Superintendent providing an update of the planning process and summarizing key points of the Preferred Alternative (Alternative 4). An independent facilitator assisted with the public question and comment portion of the meeting. Approximately 120 people attended the public hearing. A court recorder accurately captured a record of the comments of testimonials given by the public.

The NPS received 393 written and verbal comments during the public comment period. After analyzing the public comments, the NPS modified the JPP EA Preferred Alternative (Alternative 4) to the NPS Selected Alternative – Alternative 4A and distributed a second draft of the JPP EA. On June 27, 2007, the NPS hosted a public information meeting to announce the release of the second draft of the JPP EA and the beginning of a 30-day public comment period. The information meeting was held from 7:00 p.m. to 9:00 p.m. at the Lee Center, located at 1108 Jefferson Street in Alexandria, Virginia. Since the purpose of this meeting was for the NPS to provide information about the Selected Alternative, no public testimony or comments were taken.

On June 28, 2007, the NPS released the second draft of the JPP EA for public comment and identified July 30, 2007 as the deadline for receipt of comments. The JPP EA was available for public review through PEPC, individual mailings, upon request, and paper copies of the document, which were available at local libraries, at the NPS Headquarters, and at the offices of Potomac Crossing Consultants.

PUBLIC INPUT IN THE JPP PLANNING PROCESS

Public Involvement Opportunity	Date	Purpose/Issues
Stakeholder Participation Panel Meeting	December 1998	JPP project introduction.
Stakeholder Participation Panel Meeting	May 1999	Recommended location of multi-use fields, hard surface areas, and pathways.
City of Alexandria Board and Commission Meetings	August 2000	Presentation of conceptual mitigation plan.
City of Alexandria City Council Public Hearing	November 2000	Presentation of JPP concepts as approved by the SPP.
2001 JPP EA Public Comment Period	January – February 2002	2001 JPP EA available for public inspection and comment.
Joint Meeting of the SPP and the City of Alexandria Neighborhood Task Force (NTF)	June 2004	Presentation of JPP parking and access concepts.
Stakeholder Participation Panel Meeting	September 2004	Presentation of revised JPP parking alternatives.
Yates Gardens Civic Association Meeting	October 2004	Present current alternatives and obtain comments.
City of Alexandria Public Hearing and Vote	June 2005	City of Alexandria obtained public comment on proposed concepts and voted to support an action alternative that accommodates two multi-use fields on the north side of the WWB and 110 parking spaces between Royal and Lee Streets.
Citizens for a Historical and Natural Jones Point Park (CHNJP)	September 2005	Present current alternatives, clarify NEPA process and NPS Management Policies, and obtain comments.
Open House	October 2005	Present the current alternatives under consideration for improvements to JPP in an informal, open house setting.
Public Hearing	September 2006	Provide a formal opportunity for public comment on the project.
Citizen Information Meeting	June 2007	Present Alternative 4A.

Notices for meetings were posted on the NPS website, and emailed or mailed to citizens on the mailing lists. The NPS distributed press releases to the same media/newspapers as for previous meetings held during the JPP planning process. The NPS received 160 comments during the second public comment period. Although the NPS reviewed all public comments, only those that were determined to be substantive received a response. The “Summary of Substantive Public Comments and Responses to the Draft Jones Point Park Environmental Assessment” (Attachment 2 of this document) contains the NPS response to substantive comments received during both public review periods.

8. CONCLUSION

The Selected Alternative (Alternative 4A) does not constitute an action that requires the preparation of an Environmental Impact Statement (EIS) because it does not fit under any of the specific criteria provided in Section 4.4 of NPS Director’s Order 12 Handbook and does not have the potential for significant impact on the human environment as detailed in this FONSI.

Based on the JPP EA, the nature of comments from agencies and the public, and the incorporation of mitigation measures to avoid or reduce potential direct, indirect, and cumulative impacts, it is the determination of the NPS that the selection of Alternative 4A will not have a significant effect on the human environment. Adverse environmental impacts that could occur are minor to moderate, with the exception of utilities, and generally temporary in effect. There are no significant adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. In addition, no highly uncertain or controversial impacts, unique or material unknown risks, indirect or cumulative effects were identified.

Implementation of the action will not violate any federal, state, or local environmental protection law. There will be no impairment of park resources or values resulting from implementation of the Alternative 4A.

9. ATTACHMENTS

Attachment 1 – Errata for the June 2007 JPP EA

Attachment 2 – Summary of Substantive Public Comments and Responses to the Draft Jones Point Park Environmental Assessment

ATTACHMENT 1

Errata for the June 2007 JPP EA

The following changes have been made to the *Jones Point Park Environmental Assessment* (June 2007) to correct statements of fact, update information, and disclose minor adjustments to Alternative 4A and impact analyses. Changes to the text contained in these Errata are formatted with an underline for new text and crossed out for removed text.

JPP EA Section 2.0 - BACKGROUND

A. JPP Description (page 2)

A public comment asserted that the purpose of the easement extending to the Lee Street terminus and its relationship to a pedestrian path in the same location was not clearly stated. The maintenance easement to Lee Street was not acquired nor intended to be used on a regular basis for bridge maintenance. It would only be used because the South Royal Street access is closed or is made unavailable to maintenance vehicles or equipment. Currently, all of the proposed JPP improvement alternatives include a pedestrian entrance (path) to the park at the end of Lee Street. The pedestrian path has nothing to do with the maintenance easement. These are two different issues. Therefore, the NPS has revised this section to read as follows:

JPP is an approximately 65-acre park located in the southeastern corner of the City of Alexandria that is owned by the NPS under the jurisdiction of the George Washington Memorial Parkway. JPP contains many recreational amenities such as multi-use fields, natural areas, a finishing pier (used for fishing activities), historic resources, pedestrian trails, and bike paths (Figure 1). A Final Environmental Impact Statement (FEIS)/Section 4(f) Evaluation in 1997 and a Final Supplemental Environmental Impact Statement (FSEIS)/Section 4(f) Evaluation in 2000 fully documented studies of the WWB Replacement Project, including JPP.

An approximately 10-acre parcel of land that contains the WWB is within JPP (Figure 2). This land is owned by the United States and is under the jurisdiction of the FHWA (formerly Bureau of Public Roads). The FHWA granted an easement encompassing approximately 9 acres of land to the VDOT for the purpose of maintaining the existing WWB until the bridge is replaced. Although FHWA permitted free use of this land as a public convenience for parking and access from Royal Street, the land under and around the existing WWB has never been owned by a park agency, designated as a park, or used for recreational purposes. Therefore, FHWA's land under and around the WWB is not eligible for Section 4(f) consideration.

To facilitate construction and maintenance of the new WWB, the FHWA conveyed approximately 10 acres of land under their jurisdiction to the NPS for park and recreational uses. The result of this conveyance increased the size of JPP to an approximate total of 65 acres and consolidated three discontinuous areas of JPP under the sole jurisdiction of the NPS. However, VDOT maintained a perpetual easement that is approximately 5 acres larger than the current bridge easement (Figure 3). The extension of the VDOT WWB bridge maintenance easement to Lee Street was acquired to preserve a secondary access to public right-of-way at Lee Street should circumstances prevent primary maintenance access from South Royal Street. To compensate for the larger permanent easement under and around the new bridge, the FHWA would improve and enhance this portion of JPP so that the area would be useable and functional parkland suitable for recreational uses not currently available.

JPP EA Section 3.0 - DESCRIPTION OF ALTERNATIVES

G. Alternative 4A – Preferred Alternative (page 25)
(Multi-use fields north and south of the WWB)

The NPS received considerable public comment indicating that the plans in the JPP EA include more parking than what is needed at the park. Based on the analysis of needs for athletic uses of fields and other existing park uses, the NPS feels that 95 parking spaces should be adequate to meet the needs of the park. An error was noted regarding the number of additional parking spaces to be located under the WWB. Therefore, the NPS has revised this section to read as follows:

Alternative 4A features an access road that connects with a new turnaround at Royal Street and extends to a linear ~~110~~ 95-space parking area located just west of the Potomac River (see Figure 9). The turnaround, perimeter barrier system, guardhouse/gate, and landscape plantings to be located just south of the turnaround, would be similar to Alternative 4.

From the turnaround, motorists would be able to reach the parking area via the access road. The access road would be similar in location and length to Alternative 4, and would require extending the Lee Street community garden north to keep it the same size as the original garden.

A tot-lot and an 80 x 40 yard multi-use field would be located north of the parking area, and a 110 x 60 yard multi-use field would be located south of the WWB in a similar location as the existing field. A vehicle turnaround and ~~159~~ 130 additional parking spaces to be located under the WWB, the landscape plantings, the perimeter barrier system, and connection to the Mt. Vernon Trail would be similar to Alternative 4.

JPP EA Figures 5 through 9 (pages 22-27)

The Mount Vernon Trail is a multi-use trail and serves uses other than bicycling. Therefore, the NPS has changed the reference from the Mount Vernon Bicycle Trail to the Mount Vernon Trail.

JPP EA Section 4.0 – AFFECTED ENVIRONMENT

A. Social and Built Environments

Neighborhoods, Community Facilities, and Services (page 26)

A public comment questioned the number of parking spaces that were located under the WWB prior to construction of the new bridge. A preconstruction parking layout beneath the existing bridge was not found in the documents at the offices of the VDOT/Potomac Crossing Consultants. However, pictures of JPP prior to construction were found that showed approximately 16 marked parking spaces with concrete wheel stops per span that were in place at the west end of the existing bridge (starting at the second span). South Royal Street occupied the first span. Plans showing the limits of wheel stops and pavement edges beneath the WWB appear to extend to the east approximately 12 spans. Based on 16 parking spaces per span this equals to approximately 200 spaces, which does not include the parking spaces near the soccer fields adjacent to the former Army Reserve buildings. Therefore, the City of Alexandria Mayor's office estimate of 250 parking spaces is probably closer than the 80 parking spaces that were identified in the JPP EA. Therefore, the NPS has revised this section to read as follows:

The park includes two community gardens, a recycling center, and is in close proximity to the (private) St. Mary's Elementary School, located west of Royal Street, and the Yates Gardens neighborhood, located between Fairfax Street and Lee Street. The Yates Gardens neighborhood contains single-family homes and townhouses. The existing access road to JPP is located approximately 300 feet from the closest residence in the Yates Gardens neighborhood. A recycling center is located just north of the WWB (previously located south of the bridge, but relocated during bridge construction). Approximately ~~80~~ 250 parking spaces were located under the WWB prior to construction of the new bridge. Since construction on the new WWB, JPP visitors have been using an interim parking area located in the eastern portion of JPP.

JPP EA Section 5.0 – ENVIRONMENTAL CONSEQUENCES

F. Wetlands and Waters of the U.S. (page 78)

Mitigation Measures

This section identified Alternatives 1, 3 and 4A as minimizing wetland impacts and specifically mentioned that Alternatives 3 and 4A minimized wetland impacts by "providing only a single playing field north of the bridge." A public comment noted that Alternative 4 was erroneously omitted from the discussion. However, Alternative 4, which includes no playing fields north of the bridge, would have no greater reduction in impacts to wetlands than either Alternatives 3 or 4A, which would provide a single playing field north of the bridge. Therefore, this section will remain the same as in the JPP EA:

Complete avoidance of all wetland and waterway resources within JPP is not possible while still accomplishing the Purpose and Need of the proposed project. Because of restrictions on access beneath the WWB brought on by homeland security requirements, the new access road and parking for the planned improvements must be provided in some of the undeveloped portions of the park. Vehicle access would only be available by way of a new entrance road off of Royal Street, and to allow sufficient access and parking, impacts would occur to forested non-tidal wetlands located within the forested area of the park between Royal Street and the Lee Street pathway and just east of the Lee Street pathway. Also, improvements to the finishing pier to create a promenade along the Potomac River would result in unavoidable impacts to tidal emergent wetlands that have formed between the deteriorating piers. While complete avoidance of wetland impacts is not possible, Alternative 1 minimizes wetland impacts by removing the planned parking east of the Lee Street pathway, adjacent to the fields and realigning the playing fields. Alternatives 3 and 4A minimize wetland impacts by shifting some or all of the planned parking east of the Lee Street pathway and providing only a single playing field north of the bridge.

G. Vegetation, Terrestrial Habitats, and Wildlife

Mitigation Measures (page 90)

A public comment noted that this section erroneously omitted a comparison of the forest impacts associated with Alternative 4. Alternative 4, which does not include any playing fields north of the bridge, would only result in impacts to 2.7 acres of forest compared to the 2.9 acres impacted by Alternative 4A, which has a single playing field north of the bridge. The reference to the additional 2.2 acres of reforestation is to indicate that only 0.7 acre of reforestation is likely to be accomplished on-site, and that the additional 2.2 acres would need to be accomplished elsewhere.

This section also discusses the planting of approximately 252 caliper inches for the removal of individual trees along JPP Drive to satisfy agency requirements and refers to

the projected removal of individual trees (rather than the clearing of an area of forest) to allow access to the bridge for a large crane. The quantity of 252 caliper inches was calculated by measuring the diameter at breast height of specific trees projected to be removed to allow the crane to maneuver near the WWB. However, according to project staff, no trees were actually removed during this crane access operation. Therefore, this sentence was removed as shown below.

The NPS has revised this section to read as follows:

It would not be possible to completely avoid impacts to all vegetation, terrestrial habitats, and wildlife within JPP and still accomplish the purpose and need of the proposed project. Because of restrictions on access beneath the WWB, the new access road and parking for the planned improvements must be accommodated on some of the undeveloped portions of the park. Vehicle access would only be available by way of a new entrance road off Royal Street. To allow sufficient access and parking, impacts would occur to upland and wetland deciduous forest located within the park east and west of the Lee Street pathway. While complete avoidance of vegetation, terrestrial habitats, and wildlife impacts is not possible, Alternatives 3 and 4A minimize these impacts by shifting some of the planned parking east of the Lee Street pathway and providing only a single multi-use field north of the bridge. Alternative 4 would further reduce impacts to forest habitat by providing a single playing field south of the bridge.

To further minimize impacts to vegetation, terrestrial habitats, and wildlife, efforts will be made during design and construction of the proposed JPP improvements to protect existing forest areas, especially large trees. Maintaining canopy is important particularly for the species of FIDS that were identified in the Final Supplemental Jones Point Park Consolidated Natural Resources Inventory (2000) that was completed as part of the FSEIS for the WWB Replacement Project. Two FIDS found at JPP are canopy-nesters, which is why it is critical to maintain canopy wherever possible. This inventory also indicated that JPP provides adequate nesting habitat for numerous Neotropical Migratory Landbird (NML) species as well as Resident Landbirds (RL) who benefit from forest habitat. As available habitat declines, individuals of each of the species observed would also decline. Upland and wetland forest habitats on the northern half of the park, particularly along the Potomac River, provide some of the most important nesting habitat for NML and RL species within the park, including the Baltimore oriole, whose numbers are reportedly declining.

Impacts to valuable forest habitat can be reduced beyond what is proposed through successful compensation in the form of reforestation. Refer to Figure 21 for the locations of potential reforestation areas. The WWB FSEIS identified reforestation areas for mitigation of forest impacts from the WWB Replacement Project and included compensation for lost forest habitat at a 1:1 replacement ratio. Prior to reforestation, a survey would be completed to measure the average forest composition and density to determine the replacement of trees by

diameter breast height (dbh). This could be done by measuring the vegetation in a 1/4-acre test plot and applying the figure to the amount of acres of impacted forest. For instance, if 1/4-acre of forest includes 75 inches dbh of trees, then 2 acres of reforestation would require planting 600 inches dbh of trees (i.e., 600 1-inch trees, or 150 4-inch trees, or other combination). Another method could be to survey all impacted forested areas prior to construction and measure all vegetation including all trees by diameter breast height. Reforestation mitigation of approximately 0.7 acre may be feasible on-site adjacent to the area proposed for wetland mitigation, however, a detailed assessment would need to be made following completion of more detailed wetland mitigation design plans. Reforestation would be conducted using a planting plan, and five years of monitoring would be provided to assure a successful survival rate.

~~Although the NPS has identified Alternative 4A as the Selected Alternative, the alternative with the least forest impact, there would still be a need for an additional 2.2 acres of reforestation and the planting of approximately 252 caliper inches (Example: 252 1-inch caliper trees) for the removal of individual trees along Jones Point Park Drive to satisfy agency requirements. Other areas within the park that are currently not forested and not proposed for some other park activity would also be assessed for potential use as reforestation land. However, there is a high likelihood that some of the reforestation required to compensate for lost forest habitat would need to occur off-site. Other parklands within the George Washington Memorial Parkway just downstream of JPP would be investigated as potential off-site reforestation lands.~~

It may also be possible to gain some compensation credit for forest impacts through out-of-kind measures. One such measure may be the eradication of the invasive vines that threaten the remainder of the forest within the park. Removal of these invasive vines would be necessary so that existing and proposed forest areas are not damaged over time by their spread. The vine removal effort would be a long-term maintenance issue that would require a commitment from stakeholders to ensure success. Further negotiations would occur with all stakeholders regarding mitigation for unavoidable forest impacts.

The 2000 ROD for the WWB Replacement Project contains a Table of Commitments that would mitigate the potential impacts of the WWB Replacement Project as well as the JPP improvements. A copy of the Table of Commitments portion of the ROD is available for inspection at the NPS and the WWB Replacement Project office. The ROD contains the following commitments relative to forest impacts:

- *Construct trails in JPP with as narrow a path as practical, along an alignment that minimizes the fragmentation of the forest and with minimal tree removal, to maintain habitat for breeding birds.*
- *Use NPS criteria to mitigate forest impacts at JPP. Replace as much forest mitigation as possible on-site with the remainder off-site.*

The Table of Commitments indicated that an independent environmental compliance monitor(s) would monitor all facets of the WWB Replacement Project, including improvements to JPP. The monitor(s) have been reporting progress directly to the regulatory agencies and the sponsoring agencies since construction of the WWB Replacement Project began. A separate team of environmental inspectors and state agency representatives have been assisting the sponsoring agencies in their efforts. Additional commitments and environmental compliance protocols would be developed for the JPP improvement project and implemented prior to the start of park improvements.

ATTACHMENT 2

Summary of Substantive Public Comments and Responses to the Draft Jones Point Park Environmental Assessment

Introduction

Jones Point Park (JPP) in Virginia is a special place to contemplate and enjoy the wonders and resources of the Potomac River, participate in recreational activities, and study the rich history of Alexandria, Virginia and the District of Columbia. It also plays an active role in the transportation system of Washington, D.C.

Several planning projects have been initiated in JPP over the past years. These include a 1984 concept plan for the improvements to JPP; the construction of two new bridges across the Potomac River; the demolition of the existing bridge; a 2001 draft plan and Environmental Assessment (EA) for improvements to the park; and now, a continuation of the 2001 planning process to redefine the access to JPP and determine impacts to the human environment. The current JPP EA studied the access changes and impacts that would result from the federal Transportation Security Administration's security recommendations required to be implemented in JPP for the Woodrow Wilson Bridge (WWB) Replacement Project.

The NPS released the *Jones Point Park Environmental Assessment* (August 2006) for a 60-day public comment period on August 18, 2006. A public meeting recorded public comments on September 13, 2006. During the public review period, the NPS received a total of 393 comment letters and a petition with 81 signatures. On Wednesday, September 13, 2006 the NPS held a public hearing at the Radisson Inn Old Town in Alexandria. A court reporter was present at the meeting and recorded 36 public comments. Of the comment letters received, 23 were duplicates (i.e. received both in PEPC and by letter or during the public meeting). Of the petition, 29 signatures were duplicates and 10 were not readable. Most of the comments received either supported Alternative 1 or Alternative 4. In support of Alternative 1, there were 184 individual comments. In support of Alternative 4, the NPS received 219 comments including signatures from the petition. There were no comments on Alternatives 2 and 3. The NPS also received 9 general comments that did not specifically support any alternative.

The NPS released a second draft *Jones Point Park Environmental Assessment* (June 2007) for a 30-day public comment period on June 28, 2007. During the public review period, the NPS received a total of 160 comment letters and a petition with approximately 670 signatures in support of Alternative 4. A second petition was received with 54 signatures concerned about retaining fishing access. There were 19 letters in support of Alternative 1 and 94 letters in support of Alternative 4. The NPS received 43 letters against Alternative 4A. There were no letters received on Alternatives 2 and 3, and four letters did not specifically support any alternative.

The JPP EA presented the alternatives studied for improvements to the park that are a part of the mitigation commitments outlined in the 2000 Record of Decision (ROD) and 1997 Memorandum of Agreement (MOA) with the Virginia State Historic Preservation Office (SHPO) et al, required for the WWB Replacement Project. The proposed alternatives include the No-Action Alternative and five action alternatives. The No-Action Alternative maintains the existing soccer fields located south of the WWB; however, the No-Action Alternative does not address the federal Transportation Security Administration's security recommendation to remove all public vehicle access and parking from beneath the new WWB. Further, the No-Action Alternative does not fulfill the Purpose and Need for the project (refer to Chapter 1.0 of the JPP EA), the NPS resource management goals for JPP (refer to Chapter 2.0 of the JPP EA), or the conditions relevant to JPP as stated in the Record of Decision and the Memorandum of Agreement for the WWB Replacement Project (refer to Appendices E and F of the JPP EA).

The five action alternatives presented in the JPP EA, including the Selected Alternative 4A contain the following similar components: park manager's office/comfort station; tot lot; promenade/boardwalk; access to the Mt. Vernon Trail; shoreline stabilization; proposed bulkhead, canoe/kayak launch, and a fishing pier; the rehabilitation of the Jones Point Lighthouse and the preservation of the D.C. South Cornerstone; and drainage improvements along a new access road.

The differences between the action alternatives relate to the location and orientation of the multi-use fields, the length of the access road, and the location and size of parking areas. Each action alternative could use a combination of perimeter barriers to limit vehicular access and public parking under the WWB and within an 80-foot distance surrounding the bridge.

After reviewing public comments and carefully considering potential impacts to park resources, and the mitigation commitments outlined in the WWB Replacement Project, the NPS modified its Preferred Alternative, and determined Alternative 4A as its Selected Alternative for JPP improvements. The NPS developed Alternative 4A by using the best elements from the other alternatives under consideration, maximizing resource management options, assessing varied park interests and uses, and considering all of the public comments received. The NPS Selected Alternative 4A includes recreational features, an interpretive plan related to cultural resources, and proposed modifications to parking and access within the park. The NPS and the City of Alexandria's goal for the redevelopment of JPP is a carefully balanced program of active recreation, passive recreation, and interpretation of archeological, historic, cultural, and natural park features. The NPS Selected Alternative 4A meets the Purpose and Need for JPP improvements, and the level of effect does not reach above minor or moderate impacts.

Comments on the JPP EA primarily reflected the location and amount of active and passive recreational uses in the park. Commenters who supported active uses expressed a desire for two recreational fields at JPP. Those preferring passive uses expressed their desire for fewer or no recreational fields in JPP. Other important issues included the

potential effects from the action alternatives on the adjacent neighborhood, which had been impacted by the WWB Replacement Project. The most notable of these concerns was maintaining, to the maximum extent possible, the forest and wetland areas. The wetlands act as a natural buffer during flood events along the Potomac River and have moderate ecological importance. Forested areas are perceived to buffer the adjacent community from visual and noise effects from the bridge and activities conducted in the park. These natural areas are an important source of passive recreation to park users.

Similarly, commenters shared concerns that the proposed improvements would provide greater opportunities to explore and interpret JPP's history and may not be compatible with the location and uses of the recreational fields. Commenters questioned the amount of increased local traffic and noise-related activities from active uses of the multi-use fields that could impact the adjacent neighborhoods. Concerns over whether the placement of fields could negatively impact park visitors from exposure of air pollutants from vehicle exhaust coming from bridge traffic were expressed. In addition, commenters said that vehicular parking and access to the Potomac River for disabled visitors are important needs in JPP.

The preferred method for receiving public comments electronically was through the NPS Planning, Environment, and Public Comment (PEPC) website where the JPP EA was publicly posted on the Internet. Citizens filled out a comment form online or mailed comments directly to the NPS. The NPS received a total 553 official written and verbal correspondence from the public. This document contains a summary of the substantive public concerns for the JPP EA, and the NPS response to those concerns. All comments were considered during the development of the Selected Alternative 4A.

Comment Analysis Process

The letters, emails, Internet entries, and faxes represented in this report were analyzed using the NPS Internet-based PEPC database. The comment analysis process includes three main components: a coding structure, a comment database, and a narrative summary. Initially, a coding structure is developed to help sort comments into logical groups by topics. Code categories are derived from an analysis of the range of topics covered in relevant present and past planning documents, NPS legal guidance, and the letters themselves.

The second phase of the analysis involves the assignment of codes to statements made in the public correspondence. For each comment in a piece of correspondence, codes are assigned by one staff person, validated by another, and then entered into a database as verbatim quotes from actual public statements. The database, in turn, is used to help construct this narrative summary.

The third phase includes the identification of statements of public concern and the preparation of a summary report. Statements of public concern are identified throughout the coding and writing process and are derived from and supported by representative quotes from original letters. These concerns statements attempt to present common

themes identified from comments in a statement that captures the action the public feels the NPS should undertake. Public concerns are derived directly from letters and through a review of the database. Each is worded to give decision-makers a clear sense of the public's concerns. Statements of concern are not intended to replace actual comments or sample statements. Rather, they can help guide the reader to comments relating to the specific topic in which they are interested. All identified public concerns are included, whether within or beyond the limits of the JPP EA, or supported by the comments of one person or many people.

The public concern statements and its supporting quotes were carefully read to determine if the concern was within or beyond the limits of the JPP EA and whether it was substantive or not. The NPS developed responses for each substantive public concern. In accordance with the NPS' NEPA guidance (Director's Order #12), and based on the Council of Environmental Quality regulations, a substantive comment is one that:

- Questions, with reasonable basis, the accuracy of the information in the environmental analysis;
- Questions, with reasonable basis, the adequacy of environmental analysis;
- Presents reasonable alternatives other than those presented in the environmental analysis;
- Causes changes or revisions in the proposal.

Nonsubstantive comments include those that simply state a position in favor of or against the proposed alternative, merely agree or disagree with NPS policy, or otherwise express an unsupported personal preference or opinion. Although a commenter's personal opinions on a subject may influence the development of the final plan, they generally would not affect the impact analysis.

The JPP EA contains those concerns that were screened as being substantive, along with supporting quotes and the NPS responses. Emphasis in this process is on the content of the comment rather than the number of people who agree with it. This is not a vote-counting process, and no effort has been made to tabulate the number of people for or against a certain aspect of a specific planning topic.

Although the comment analysis process attempted to capture the full range of substantive public concerns, this summary should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. All substantive comments are treated equally and are not weighted by number, organizational affiliation, or other status of commenters.

For more information, the reader should refer to the database reports prepared as part of this process and the original letters available in the Planning and Compliance Office, George Washington Memorial Parkway, McLean, Virginia, 22101.

How To Use This Document

This comment analysis summary is divided into sections. The first section includes general comments on the planning process and NPS policies. The next section covers comments on the JPP Improvement Plan alternatives. The following section addresses comments regarding natural resources, including water, vegetation, wetlands, and cultural resources. The final section addresses park social resources including visitor experience, access, transportation, and park operations.

Each section includes one or more statements of public concern. These statements attempt to present common themes identified from comments that capture what action the public feels the NPS should undertake. Each statement is, in turn, followed by supporting quotes from public comments derived from original correspondence. Where appropriate, text in brackets attempts to clarify the meaning in a quote. Each public concern statement, and its supporting quote, is followed by the NPS response.

South JPP Historic Area

Concern Statement: Commenters stated that any placement of a multi-use field south of the bridge is contrary to the MOA as outlined under the WWB FSEIS as indicated in the incompatible uses of resources. Specifically, commenters stated that active use of fields (and associated noise and commotion levels) would negatively affect park uses for quiet contemplation of historic resources, and that fields are inconsistent with the character, viewscape, or purpose of a National Historic Landmark.

Representative Quote: “Plan 4A negates any mitigation measures, such as an interpretive trail and shipway, proposed to reduce the adverse impact on the character of the major part of the National Historic Landmark District on Jones Point and properties separately listed on the National Register of Historic Places....The EA provides no mitigation of this impact. While a great percentage of the forest will remain with either plan, the historic experience will be largely destroyed if plan 4A is adopted.”

Representative Quote: “The issue is not whether public interpretation can be presented, but rather whether the visitor can appreciate the historic character of this place when active recreation is occurring.”

NPS Response: It is important to note that JPP is not located within the Alexandria National Historic Landmark District. Page 38 of the JPP EA indicated that Franklin Street is the southernmost boundary of the National Historic Landmark District and is located one to two blocks north of the northern edge of JPP. Within JPP, certain historic properties including the Jones Point Lighthouse and the D.C. South Cornerstone, are individually listed in the National Register, while the VSC Site is a contributing element of the Alexandria National Register Historic District. Other than being in a park setting, there is no official “cultural landscape” that links these historic properties together.

The 1997 *Memorandum of Agreement Regarding the Woodrow Wilson Memorial Bridge Project* includes broad language directing the FHWA and Virginia DOT to “include pier placement which maintains park use areas” (page 5). It also directs that “construction impacts to historic and archeological resources shall be avoided or minimized to the extent possible” (page 6). NPS believes that these goals have been met by FHWA and VDOT for the past decade, and continue to be integrated into Selected Alternative 4A.

Under MOA Stipulation VI, Treatment of Historic Architectural Resources, the document provides specific guidance on planned improvements that “aid in the recognition of the historic past of the park and implement measures to preserve historic resources within the park” (page 10). However, there is no guidance within the MOA that could be interpreted to limit placement of any athletic fields to any specific location within JPP. In fact, the area south of the bridge has been programmed by the City of Alexandria and the NPS for this use for many years prior to the construction of the new WWB. The City’s own 1984 concept plan (EA, Figure 4) also shows not one, but two fields in this area of the park. Taking these factors into account, the NPS does not agree with the comment that “placement of a field south of the bridge is contrary to the MOA.”

The NPS successfully operates numerous parks, both within the greater Washington, D.C. area and across the nation, that balance active and passive recreational use with the preservation of historic above-ground and archeological resources. In Washington, D.C. perhaps the best example is the National Mall which, on an annual basis, accommodates numerous major public events, protests, and recreational uses, which are often loud and raucous. The NPS does not believe that these uses are inconsistent with the character, viewscape, or character of this National Historic Landmark, and the National Mall continues to be recognized for its architectural and symbolic importance to the nation even while these non-historic uses continue and increase. In other areas of Washington, D.C., NPS units associated with the Civil War Defenses of Washington such as Fort Reno, Fort Stevens, and others successfully balance active recreational use and protection and preservation of historic elements, both of which are important to the public.

The integration of multiple uses within national parks is a fundamental tenet of the NPS, as articulated in its 1916 Organic Act (16 U.S.C. 1, 2, 3, and 4). This states that the mission of the NPS is to “...promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified by such means and measures as conform to the fundamental purposes of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.” The NPS believes that its selection of Alternative 4A balances the views of the public regarding improvements to JPP and successfully achieves these broad goals.

The NPS does not agree with the statement that “Plan 4A negates any mitigation measures, such as an interpretive trail and shipway, proposed to reduce the adverse impact on the character of the major part of the National Historic Landmark District on JPP and properties separately listed on the National Register of Historic Places. The EA provides no mitigation of this impact...” The JPP improvements are proposed as mitigation for overall adverse effects from the WWB Replacement Project on the Alexandria National Historic Landmark and National Register Districts, as well as the lighthouse and cornerstone. The improvements, themselves, have been evaluated under National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) Section 106 authorities, and have been determined not to cause adverse effects.

Because the use of multi-use fields within JPP will ultimately be controlled by the City of Alexandria and its Recreation Department, the City is in the best position to ensure that the fields are used according to established guidelines. Stringent adherence to these guidelines, including control of non-authorized use, may be the best way to ensure that “quiet contemplation of historic resources” will be achieved.

Concern Statement: Commenters stated that potential impacts to archeological resources that could result from construction activities has not been fully addressed or analyzed.

Representative Quote: “The impact on the archeological resources from the activities associated with the rehabilitation and preservation of the lighthouse and D.C. Cornerstone (including the demolition and rebuilding of the sea wall and vault, the reconstruction of several architectural features, landscaping, and construction of access paths for the physically challenged) has not been assessed. It is likely that these construction activities will have an impact on the potentially significant prehistoric and early historic resources that are located on the pre-1910 peninsula. As a result, archeological excavations will be needed in these areas prior to the construction activities. This impact should be incorporated into the analysis section of the various alternatives and should be indicated in the summary of impacts section on page S-5, of the JPP EA 2007.”

NPS Response: Based on the level of information known at this conceptual phase of park planning and development, NPS believes that impacts to known archeological sites have been adequately addressed in the EA.

As noted in the JPP EA, the Archeological Preservation Plan (and a specific Treatment Plan which was incorporated into it) was developed and approved in 2002, incorporating comments from the NPS, the Virginia Department of Historic Resources (State Historic Preservation Office), and the City of Alexandria. This document provides a written protocol for the review of partial and final park improvement plans (EA, pages 99-100). Because the next phase of design documents (65% level) will not be developed until the JPP EA is completed and

adopted, an assessment of the impact of new construction on any archeological features cannot be completed at this time.

In the discussion of Alternative 4A (page 113), the JPP EA clearly states that all of the areas of concern noted by the commenting member of the public will be addressed through the existing Archeological Preservation Plan cultural resources management mechanism. When the 65% design documents are completed, these will be shared with each of the signatories of the document, including the NPS, Virginia Department of Historic Resources, and the City of Alexandria. Comments received will be taken into account in development of final improvement plans. At this point in time, the need for additional archeological investigations may be identified. If the NPS concurs that these studies are warranted, based on comments received, these additional studies will be undertaken and completed, and the information gained through these investigations will be shared with the parties noted above, and used in the preparation of the final (100%) design documents. Archeological resources will be appropriately treated as a component of the work to improve the Jones Point Lighthouse and D.C. South Cornerstone.

Concern Statement: Commenters think that a field south of the WWB is an inappropriate use of park land.

Representative Quote: “The NPS plan of one half-field on the south side of the bridge threatens the historical area around the lighthouse and river. This is not an appropriate mixed use area given the size of the park.”

Representative Quote: “Part of the mitigation efforts do include greater interpretation of this very rich prehistoric and historical site, and we find that an athletic field, especially one that would be very active and not informal, would be incompatible with the enjoyment of that type of interpretation.”

Representative Quote: “Alternative 1 separates in a sensible way the uses of the park for passive and active recreation. It preserves very well the recreation, historic, and archaeological attributes of JPP. The EA's preferred alternative is harmful to all of these uses. In addition, the EA fails to recognize and very substantially under-states and distorts the harm that the preferred alternative will do to historic and archaeological resources.”

Representative Quote: “Only by ignoring important facts, such as the preferred alternative's impact on historic/archaeological resources south of Woodrow Wilson Bridge is the NPS able to contort the facts to allow for the preferred alternative.”

NPS Response: Preferred Alternative 4A would place a large field (110 x 60 YD) in the southern portion of JPP. This reflects an increase in field size compared with the preferred alternative presented in the JPP EA. However, the majority of the new field would lie within the footprint of the existing soccer fields. In

addition, the new field would be shifted closer to the WWB to move away from the cultural resources of the VSC Site and the D.C. Boundary Line. The multi-use field will be centered as far away from the Jones Point Lighthouse as possible.

A primary interest for placing a recreational field within the historic area of JPP is to protect the natural woodland and wetland resources north of the bridge, and to maintain to the extent possible, a vegetative buffer between the adjacent residential community and the park, as well as from the effects (i.e. noise) from the WWB Replacement Project. The design of the multi-use field will take into consideration the needs for cultural resource preservation and creating interpretive opportunities for those resources (i.e. trails, access, and informational signage). Although the multi-use field will be in close proximity to the cultural resources of the VSC Site and the D.C. Boundary Line, the ability to provide interpretive opportunities will still exist. Plans include exposing, treating, and then interpreting the historic remnants of the VSC Site. A form of demarcation will provide a means to interpret the D.C. Boundary Line; however, the corner of the field will cut through and cause an interruption along a small portion of the line.

Archeological resources would require protection. During construction of the fields, clean fill would be placed on top of and essentially covering and encapsulating the archeological resource. In archeologically sensitive areas, special measures will be taken during construction so as not to cause impact to these areas. This may include fencing off areas, laying down matting, and appropriate and controlled use of equipment.

Although the presence of a multi-use field seems contrary to the desire for passive uses in the southern portion of JPP, it is tempered by providing opportunities for historic interpretation and passive recreational activities in other areas of the park. Further opportunities for passive recreational activities will be available when the field is not in use. Also, at specified times, the field will be closed for active recreational use for seeding and related maintenance interests.

Historic Resources

Concern Statement: Commenters recommended reevaluating the need to remove 1 acre of forest to expose and interpret the VSC Site. Another more suitable treatment could be done and result in less loss and impact to forested areas.

NPS Response: As noted on page 20 of the June 2007 JPP EA, the “VSC Site would be enhanced and interpreted in accordance with the MOA and a January 2001 WWB Replacement Project treatment plan. Specifically, certain remaining elements of the VSC Site – one of the shipways and the finishing pier – are being retained and interpreted for the public as part of the overall park interpretation plan.” When it comes to the design and construction of the overall treatment of the remains, it could be possible that less than an acre of forest would be

impacted. The NPS will take this into consideration during subsequent planning phases.

Park Uses

Concern Statement: Commenters noted that the City of Alexandria considers recreational fields to be a “community facility” similar to the community garden.

Representative Quote:

“The JPP EA 2007 does not include recreational fields as a community facility, and, as such, does not address the impacts of displacement of the proposed fields. The NPS Preferred Alternative falls significantly short of meeting the terms of the Settlement Agreement and does not address the Environmental Justice Populations for this regional park.”

NPS Response: The NPS considers multi-use fields a park use and has included discussion related to recreational use of fields under the section “Visitor Use and Experience.” The Selected Alternative 4A would provide multi-use fields north and south of the bridge, and would benefit all segments of the community. The NPS owns and administers JPP, and has operated under an agreement to allow the City use of the park for recreational fields. The NPS was not a signatory in the Settlement Agreement” and thus is not bound by terms in the agreement.

Concern Statement: The JPP EA does not adequately address what types and amounts of permitting will be for the use of fields for sports.

NPS Response: The NPS envisions the type and amount of play similar to past conditions. JPP would be permitted for athletic uses by the City of Alexandria primarily for youth sports. The perception that JPP would become a “sports complex” is incorrect. If the NPS feels that a balance between active uses and passive uses of the park is not being achieved because of too much field use for active sports, the GWMP Superintendent can place limitations or even eliminate that park use in order to provide the desired balance.

Visitor Experience, Access, Transportation, and Park Operations

Concern Statement: Commenters questioned why park access via South Street (south of the bridge) was not included in the EA.

Representative Quote: (page 72) “It is irresponsible for the NPS to have left out any discussion of the access to JPP from the GW Parkway at South Street. This is a recently established intersection controlled by a traffic light just south of the Urban Deck on South Washington.”

NPS Response: In August 2003, the federal Transportation Security Administration performed a vulnerability assessment and recommended the removal of all public parking and access from beneath the WWB. Based on recommendations, it was decided during the EA process to eliminate parking and vehicular access in the park within an 80-foot standoff distance measured from the north and south parapet drip lines of the new WWB. The NPS did not consider South Street as an access because it would require vehicular access directly under the bridge in both directions to reach parking areas, and violate the security agreement.

Concern Statement: Commenters stated that the replacement of traditional fishing on the existing finishing pier north of the WWB would greatly impact fishing activities at JPP. Vehicular access to this location was also stated as being important.

NPS Response: The plans to change the Finishing Pier to a promenade/boardwalk would not prevent access for fishing activities. As stated on page 20 of the JPP EA under Items Common to All Alternatives, “under all action alternatives, the current finishing pier would be changed to a promenade/boardwalk. Although the potential conversion of the finishing pier to a promenade/boardwalk would not prevent its use for fishing activities, two fishing piers would be provided within 200 feet of the existing fishing area, along the southeastern edge of the park. Access to fishing opportunities would be improved as the pedestrian paths and fishing piers would be designed to comply with current ADA regulations.” The Selected Alternative 4A will provide parking access to within approximately 100 feet of the promenade. Trails with handicap access will lead to the shoreline developments. Overall, these developments will have a beneficial, local, long-term, minor impact to fishing and other recreational activities. During design and planning, the park will encourage input from the fishing community to ensure adequate access is available and promote sustainable activities for fishing at JPP.

Concern Statement: Commenters noted that two full-sized fields at JPP have always been planned as part of the WWB Replacement Project (referred to the Department of Transportation's mitigation agreement to provide replacement fields). Commenters claim that the NPS Preferred Alternative was part of earlier discussions and was never presented publicly during numerous meetings on park design.

Representative Quote: “Two fields was the original configuration of Jones Point, there is Congressional language in the bridge mitigation project that supports two fields, and it complies with Environmental regulations.”

Representative Quote: “It is of great concern that Alternative 1 was approved and went through extensive public review, that 2 full fields have been part of the project since its inception and that Alternative 4 designed by the NPS was NOT part of any earlier discussions.”

Representative Quote: “The City used a portion of the land for this purpose [fields] prior to the reconstruction of the new WWB and I've not seen any compelling arguments put forth by the National Park Service as to why a portion of the land cannot again be used for this purpose.”

NPS Response: Based on the potential impacts to natural resources that would result from development of two fields north of the bridge, and substantial comments received in favor of developing two fields at JPP, the NPS modified the Preferred Alternative to include one small field (80 x 40 YD) north of the bridge and a larger field (110 x 60 YD) south of the bridge. Alternative 4A provides for a balance of active and passive uses of the park while ensuring the protection of natural and cultural resources. The alternative also considered the importance of locating park facilities north of the bridge as far away as possible from the adjacent community most affected by the WWB construction in an effort to best meet those concerns from the community, and mitigations identified to reduce noise and traffic impacts to the neighborhood.

Concern Statement: Event parking under the bridge is not feasible because of the security costs associated with operating the parking.

Representative Quote: “There should be no parking under the WWB even for special events (Alternatives 2, 3, & 4). Any parking under the bridge would require the city to force security personnel (police) to work excessive overtime.”

NPS Response: The JPP EA does not state that the City will carry the full responsibility for security and operations for event parking under the bridge. Depending on the nature of the event, and other considerations, the City and the NPS will discuss general security and law enforcement interests accordingly.

Concern Statement: Commenters believe the maintenance of fields would be high at JPP, which could result in less than adequate maintenance and appearance.

Representative Quote: “We are strongly in favor of having sufficient soccer fields for the community, but this is not the only alternative, nor is it really a wise one. The location and tendency to flood would require more than normal maintenance.”

Representative Quote: “The fact that the City of Alexandria has failed to make accommodation for the appropriate number of athletic fields to be established and maintained elsewhere within its jurisdiction serves as an alarm to us in the neighborhood that know that there is no justifiable excuse to encroach upon a forested federal park for the land for this purpose. The City of Alexandria wishes to obtain athletic field space, yet they often do not use operation and maintenance money that they need to maintain the parks they already have.”

NPS Response: Under Alternative 4A, the multi-use field to be located north of the bridge will be designed to properly drain and dispose of water according to the

drainage needs outlined in the *Hydrologic and Hydraulic Analysis Report - Jones Point Park Drainage Study*. Although periodic flooding could potentially cover the field with water, the infrequency of these events should not cause excessive maintenance costs. Every effort will be made to ensure that the multi-use fields at JPP are adequately maintained.

Concern Statement: Commenters state that impacts to community facilities were not adequately addressed by loss or gain in fields. Youth at risk could suffer if athletic fields are not developed.

Representative Quote: “The Preferred Alternative in its assessment of impacts on environmental justice population indicates that there are no such populations within the project boundaries and that use of the park by environmental justice populations for fishing is the only use that must be assessed under the provisions of the EA....there are children that fall under this definition that have and could in the future use athletic fields....These at “risk youth” are highly correlated with the “environmental justice populations” that the NPS MUST address in the EA.”

NPS Response: Alternative 4A will provide multi-use fields both north and south of the bridge, play courts, a tot lot, and other passive recreational and historic interpretive activities that will benefit "at risk youth" as well as other members of the community.

Concern Statement: Commenters suggest that potential traffic volumes associated with athletic uses of JPP will negatively affect adjacent neighborhoods.

Representative Quote: “The assumptions about parking that can be accommodated in the park may already be overly optimistic, however, putting the neighborhood at risk. Fairfax County, Virginia assumes a need for 50 (not 40) spaces per field; and the Alexandria Recreation Department cautions that, when two games are scheduled in close sequence, the peak demand can double to accommodate arriving and departing vehicles. Two athletic fields, fully scheduled, might thus create a peak demand for as many as 200 parking spaces (plus the 30 spaces for general park visitors): manageable under the bridge in the original design, but well beyond what is provided now under any of the alternative concept designs.”

Representative Quote: “Jones Point Park's setting... can be accessed only by narrow streets through residential neighborhoods. It is far from an ideal location for facilities which are intended or expected to draw any substantial volume of vehicular traffic from all over the City of Alexandria and beyond.”

NPS Response: The analysis of parking needs and capacity used the City of Alexandria's standard of 40-75 spaces per field of regulation size depending on the intensity of use. Under Alternative 4A, 95 spaces provide adequate parking for two fields in use, plus spaces for other park visitors, thereby minimizing the need to park in adjacent neighborhoods. In contrast to fields at other city parks,

the fields at JPP are not expected to be used as intensely, therefore, parking is anticipated to be sufficient. The NPS will work with the City of Alexandria to insure an appropriate level of permitted activities on the playing fields. Between scheduled games, there would be a small increase in traffic on the scale of a few hundred cars per hour.

Concern Statement: Commenters point out that placing a tot lot closer to the river can pose safety hazards to children.

Representative Quote: “A couple of things I question is the tot lot right at the edge of the water....Down by the bulkhead there, it is not only deep for tall ships, but it doesn’t even have a ladder if a dog or fisherman, or child falls in the water.”

NPS Response: The NPS agrees with the comments on this matter. Under Alternative 4A, the tot lot will be located further away from the waterfront on the west side of the multi-use field north of the bridge. This will provide a barrier and safe distance for children and others who use the facility.

Concern Statement: Commenters state that large active playing fields are not the responsibility of the NPS.

Representative Quote: “It was probably not inappropriate that the Alexandria City Council would consider other factors specific to the needs of the city (such as the cost or suitability of other potential sites for playing fields in the city, the overall supply and demand for recreational facilities in the area, and the convenience and economy of using facilities in Jones Point Park for city employee parking) in its assessment of the options before it. But I respectfully submit that such considerations, while perhaps appropriate to Alexandria’s city government, are not the proper purview or responsibility of the National Park Service. NPS/GWMP, rather, as its letter on the Environmental Assessment process suggests, should concentrate its focus on the Access and Circulation, Natural and Cultural Resource Management, and Visitor Activities considerations specific to Jones Point Park itself.”

Representative Quote: “It [Jones Point Park] just is not a suitable place in which to build a large soccer complex.”

NPS Response: National Park Service policies provide guidance on appropriate visitor uses and recreational activities in national park units:

The National Park Service will manage recreational activities according to the criteria listed in sections 8.1 and 8.2 (and 6.4 in wilderness areas). Examples of the broad range of recreational activities that take place in parks include, but are not limited to, boating, camping, bicycling, fishing, hiking, horseback riding and packing, outdoor sports, picnicking, scuba diving, cross-country skiing, caving, mountain and rock climbing, earth caching, and swimming. Many of these activities support the federal policy of promoting the health and personal fitness

of the general public, as set forth in Executive Order 13266. However, not all of these activities will be appropriate or allowable in all parks; that determination must be made on the basis of park-specific planning.

Although multi-use fields may not be considered by everyone as a form of recreational activity typical of a national park, it is a recreational use found in various urban park settings where it serves the public interest. Through the EA process, the NPS has determined that multi-use fields are in keeping with the protection and preservation of other park natural and cultural resources without causing impairment or unacceptable impacts to natural and cultural resources or values. In addition, the NPS feels that multi-use fields are not a new recreational activity, and that the concepts for improving this use date back even before the 1984 *Jones Point Park Implementation Plan*, making this use consistent with the purpose for which the park exists. If it becomes clear that the use of multi-use fields is causing unacceptable impacts to park resources and values, the GWMP Superintendent can place limitations on the use or even prohibit the activity.

Traffic and Noise

Concern Statement: Commenters stated that the increase in local traffic (and associated impacts on local neighborhoods and public safety) that would result from intensive park use of athletic fields has not been adequately addressed in the EA.

Representative Quote: “Page 15 [of the EA] Traffic and Transportation. I’m unclear as to why this states that traffic and transportation will not be evaluated, since it was somewhat (although inadequately) evaluated in the draft EA. The EA states traffic and transportation were evaluated in the WWB Final Supplemental Environmental Impact Statement (FSEIS), which is not adequate or appropriate for the immediate effects of the soccer/athletic fields on the impacted neighborhood.”

NPS Response: As stated in the JPP EA, a separate traffic analysis was not performed since the approved WWB FSEIS contained an analysis of traffic and transportation for the entire project, and the JPP improvements are a part of the WWB Replacement Project. Furthermore, additional traffic analysis for the JPP EA was not pursued since it was clear that there would be a net decrease in traffic along Royal Street approaching JPP due to the permanent closure of the South Street connection to Washington Street. Based on the proposed park improvements, it was anticipated that there would be only minor increase in traffic generated by the JPP improvements since many of the same attractions and activities that existed in JPP prior to the WWB Replacement Project would be provided in the final JPP improvements.

Due to the concerns received during public review of the JPP EA regarding potential traffic-related impacts on local neighborhoods associated with the JPP improvements, the NPS reviewed the materials related to this issue to ascertain the measure of potential impacts.

Prior to construction activities to replace the existing WWB, Royal Street was continuous south of Green Street, under the WWB (first span), where it intersected with South Street at the south side of the bridge. South Street continued through the Hunting Towers residential complex where it intersected with Washington Street. Because traffic volumes on Washington Street were fairly heavy during peak hours, South Street was a popular alternate route to and from Royal Street providing access to Old Town Alexandria. Prior to the WWB Project, approximately 3,500 to 4,000 vehicles per day were using the South Street connector to Royal Street, which brought substantial traffic into the neighborhood just north of JPP.

In order to accommodate the widening of I-95, adjacent to the Hunting Towers/Terrace complexes, it was necessary to remove a number of existing residential buildings. This widening of the I-95 approach to the new bridge included reconstruction of Washington Street and complete reconfiguration of access and parking for the remaining Hunting Towers/Terrace complex. This reconfiguration included closing South Street and abandoning the public access through the Hunting Towers complex to Royal Street thereby closing the alternate access to Old Town Alexandria from Washington Street. Once South Street was closed in 2003, there was a substantial decrease in traffic along Royal Street from JPP.

In August 2003, the federal Transportation Security Administration recommended special security measures (as a result of the September 11, 2001 terrorist attacks) which included restricting public vehicular parking and access within 80 feet of the drip line of the new WWB inside JPP. This adopted security restriction eliminated any possibility of re-establishing a public access roadway from Washington Street to Royal Street. This substantially reduced local traffic along Royal Street south of Green Street. The adopted security restriction created a new southern terminus for Royal Street at the entrance to JPP. Therefore, only St. Mary's School/Cemetery and JPP would generate traffic along the portion of Royal Street south of Green Street.

The question of how much additional traffic would be generated by the improvements to JPP is difficult to quantify but certain assumptions can be made to determine potential generation of both average daily traffic and peak hour traffic. First, it is not anticipated that JPP will generate 3,500 to 4,000 cars per day on average as was occurring along Royal Street before construction activities began on the WWB. It is anticipated that daily traffic will vary but would probably be less than 500 vehicles a day, on average. Secondly, as currently proposed, JPP will only provide public access parking for 95 vehicles, which is not likely to generate traffic in the range of 3,500 to 4,000 vehicles a day.

The main traffic generator in JPP is anticipated to be special events and regularly scheduled games played on the multi-use playing fields. Special events could

occur a few times a year. The total number of parking spaces that could be provided for special events would be approximately 335 spaces. This includes 95 public access parking spaces and approximately 240 secured parking spaces. Secured parking spaces will be provided under the new WWB but use will be restricted to when security personnel are present. No additional parking spaces are being provided in the ultimate JPP improvements; therefore, any impacts to the surrounding neighborhood from special events should not increase due to improvements made to the park.

As stated above, the Average Daily Traffic (ADT) of Royal Street, prior to the WWB construction, was estimated to be approximately 3,500 to 4,000 vehicles per day. Peak hourly traffic volume can be estimated by assuming ten percent of the ADT which would equal approximately 350 to 400 vehicles per hour along Royal Street, south of Green Street.

The following provides the basis for assuming maximum peak hourly traffic, of 190 vehicles per hour, generated by the JPP improvements. The peak hourly traffic volume generated by the JPP improvements due to regularly scheduled events, like soccer games, could be conservatively estimated by considering a reasonable maximum number of vehicles that would be involved in two closely scheduled games. Two games scheduled back-to-back for both multi-use fields was assumed. This would amount to a traffic volume approximately twice the public parking space capacity at 190 vehicles per hour. This would account for a maximum number of parked vehicles (95) leaving JPP and a maximum number of vehicles (95) entering JPP within a one hour time period.

To consider how this maximum traffic volume would impact the local neighborhood roadway system, a series of worst-case scenario traffic analyses were developed. To demonstrate this impact, the intersection of Green Street and Royal Street was analyzed to determine what magnitude of traffic volumes would cause an unacceptable Level of Service (LOS) operation at this intersection, the closest intersection to JPP. LOS is a measure of expected travel delay, driver discomfort, and congestion. A rating scale, using the letters A through F, describes the amount of delay or congestion that drivers experience. The letter A represents free flowing traffic conditions through the letter F, which represents stop-and-go traffic conditions. A LOS of “D” is the lowest level of service that is considered acceptable for local street operations. The City of Alexandria has determined that Royal Street is classified as a local street.

The existing intersection at Green Street and Royal Street is a four-leg intersection with stop controls (stop signs) at each leg that require approaching vehicles to take turns moving through the intersection. The analysis scenario further assumed that an equivalent amount of traffic was approaching from each of the four legs at the same time over the course of an hour. (In reality, it is highly unlikely that each leg would experience identical volumes of traffic during a given period, but it was decided to test a worse-case scenario to see what range

of traffic volume causes the intersection to reach an unacceptable LOS. For this analysis, each approach to the intersection is a single lane and each lane has the random distribution of the following movements: 25% left turn, 50% through and 25% right turns. The following table shows the LOS results for different ranges of traffic volumes that approach the selected intersection.

Vehicles Per Hour approaching each leg at Green & Royal Streets	Level of Service (LOS)	LOS General Operating Conditions
400	F	Most congested, forced or breakdown flow
320	D	Approaching unstable flow
300	C	Stable Flow
200	B	Reasonably free flow

Based on the analysis results of four different traffic volume scenarios, an hourly traffic volume of approximately 320 vehicles per hour would be the threshold where traffic operations would start to be unacceptable. As discussed above, where JPP could conceivably generate 190 vehicles per hour between scheduled soccer games, the LOS would be a B or better. Therefore, the maximum anticipated traffic generated by the JPP improvements will not increase local daily traffic nor will it produce traffic that is at an unacceptable level of service.

Concern Statement: Commenters stated that noise-related impacts associated with the multi-use fields north of the WWB were not adequately addressed in the JPP EA.

Representative Quote: "Alternative 4A adds new noise pollution to the already substantial incremental noise pollution by adding new playing field north of the bridge. All of the near neighbors will be most affected. A new noise assessment and abatement plan must be developed and submitted for public comment before an alternative can be proposed."

NPS Response: After reviewing the public comment, the NPS and Potomac Crossing Consultants performed an analysis to determine what potential noise impacts on adjacent neighborhoods might be associated with multi-use fields north of the WWB. To assess the potential for non-traffic-related noise associated with the Alternative 4A's north side multi-use field to influence the noise environment of the adjacent residential community, consideration was given to the overall noise environment within the community and the distance from noise source to receiver. As the proposed multi-use field may have many different users, from pick-up games and adult leagues with little to no fan support, to children's leagues with cheering parents, the noise generated from these activities will vary greatly. Since it would be difficult to state which activity would generate the most noise, an assessment of what type of noise level coming from the field would be needed to influence the noise level to nearby residences.

Included with the WWB Replacement Project's environmental studies, traffic noise levels were predicted for the residential areas adjacent JPP. The basis for determining traffic noise levels is the one-hour equivalent sound level, which is defined as the equivalent steady state sound level which, in one hour, contains the same acoustical energy as the time-varying sound level during the same time period. For the residences near the end of Lee Street to the intersection of Lee and Green Street and Alexander Street in Ford's Landing, the predicted design year with barrier traffic noise level from I-95/I-495 ranges from 60-62 dBA. This is approximately equivalent to noise generated from normal conversation at three feet.

While activities on the soccer field are in motion, the location of the field and any spectators are fixed and, therefore, the soccer field can be considered as a point, or stationary source. Noise prediction for a point source can be simplified to the following:

$$Leq = Leq(ref) - 20\log(D/50) - 10G \log(D/50) - A_{shielding} \quad (1)$$

Where:

Leq = equivalent sound at the receiver

Leq(ref) = equivalent sound of the source at 50 feet

D. = the distance from the source to receiver

G = Ground Factor

A_{shielding} = Attenuation due to barriers, rows of building and trees

No existing or proposed barriers will be between the source (the field) and the receivers (the residential properties), and because all the adjacent properties are first row, meaning no rows of buildings are present between the source and receiver, attenuation from these can be eliminated. Likewise, in the assessment of the existing trees, they do not meet the criteria of dense foliage (2), particularly during fall, winter and early spring. Therefore, attenuation due to barrier, buildings and trees can be eliminated. The ground factor (G) is a coefficient based on the relationship of the height of the source to the height of the receiver. Since both the source and receiver are at the same height above ground, this factor is 0.66. Finally, since we know the traffic noise level at the receiver, we can re-write the equation as follows to determine what the noise level emanating from the soccer field would need to be to influence the traffic noise level:

$$Leq(ref) = Leq + 20\log(D/50) + (10)(0.66)\log(D/50)$$

To determine the distance from the soccer field to the residences previously noted, a point at the northern edge of the center of the proposed multi-use field in Alternative 4A was used. This location yields distances ranging from 1,000 feet to 832. In order to match the previously noted predicted traffic noise levels, noise generated from the soccer field would need to equate to an equivalent one hour

steady state noise level of 95 decibels. While it is possible that excitement levels associated with the activity on the field could briefly generate noise levels in the 90 decibels range (food processor at 3 feet), it is extremely unlikely that these levels could be sustained for a one-hour period. Even measurements at professional stadiums do not sustain on-field noise levels of this nature. However, it should be noted, that this does not mean that noise generated at the soccer field will not be heard, as the human ear has an acute ability to differentiate sound sources; but rather that it will not substantially influence the overall sound within the community.

Air Quality

Concern Statement: Commenters stated that air pollution from the WWB will affect the athletic use of multi-use fields at JPP and that further analysis is needed to determine the potential affects of air quality below the bridge on park users.

Representative Quote: “...an Environmental Impact Statement (EIS) needs to be done in order to determine what effects the air quality will have on children playing on the soccer fields.”

NPS Response: The results of the air quality analysis performed in support of the 2000 WWB FSEIS indicated that the operation of the WWB, once completed, will not “cause or exacerbate any violation of the applicable State and National Ambient Air Quality Standards (NAAQS) for the area affected by the Project.” The air quality analysis performed for the WWB FSEIS included JPP.

The U.S. Environmental Protection Agency (USEPA) has identified eight air pollutants as being of concern nationwide: carbon monoxide (CO), sulfur oxides (SO_x), hydrocarbons (HC), nitrogen oxides (NO_x), ozone (O₃), lead (Pb), particulate matter sized 10 microns or less (PM₁₀), and particulate matter with a size of 2.5 microns or less (PM_{2.5}). Of these pollutants, CO is the only pollutant whose localized effects are currently requiring a detailed, microscale mobile source impact evaluation for roadway projects at the EIS level.

The regional (comprising the Washington, D.C. metropolitan area) effects of the WWB Replacement Project on O₃ levels were considered in the regional CO, NO_x and volatile organic compounds (VOC) emissions analysis performed by the Metropolitan Washington Council of Governments (MWCOCG). The results of the MWCOCG analysis (performed for the FY 2000-2005 Transportation Improvement Program - TIP) concluded that the mobile source CO, NO_x and VOC emissions for the region (including this project as a 12 lane crossing without toll facilities) will be below the acceptable emission standards for the future years 2005, 2010, and 2020.

The 2000 WWB FSEIS air quality analysis indicated that predicted CO levels for the selected 12 lane build alternative will be in compliance with the NAAQS for the design year 2020 at all locations analyzed within JPP. Current highest CO levels monitored by Virginia Department of Environmental Quality at Fairfax

County are several times below the standard and are expected to decrease in the future due to cleaner motor vehicles and fuels.

The 2000 WWB FSEIS estimated ambient CO levels at 10 locations within JPP. The highest one-hour predicted level was 6.9 parts per million (ppm) and the highest eight-hour level was 4.5 ppm. The predicted CO levels at the peak location in JPP were half the standard for the eight-hour period (9 ppm) and less than 1/5 of the standard for the one-hour period (35 ppm). These CO levels were based on estimated peak-hour bridge traffic of approximately 17,700 vehicles per hour for all lanes in both directions.

As a worst-case scenario, an additional air quality analysis was performed during 2006 assuming that all 110 parking spaces could have vehicles leaving JPP during a peak hour. The results of this 2006 analysis indicated that the CO emissions from all these vehicles leaving parking spaces and traveling to the edge of JPP will represent only 1% over the CO emissions generated by the peak hour traffic on the WWB. As a result, it was concluded that the effects of the full use of the parking facilities would not have any substantial effect on the air quality of JPP and will not change the findings stated in the 2000 WWB FSEIS air quality analysis.

As a consequence, air quality predictions in the 2000 WWB FSEIS, and the monitored data from 2002 to 2006, indicates that the construction and future operation of the WWB Replacement Project should not result in any exceedance of the NAAQS at any location within JPP.

Process and Policy

Concern Statement: Commenters suggested that the public comment analysis does not present a full view of the issues.

Representative Quote: “First, the public discourse is not well documented. Whereas 12 public agencies have their comments presented in full in appendix H (31 pages), the 393 public citizen's comments (page 128, table 3) are only summarized in aggregate in Appendix I (13 pages). Much of Appendix I is devoted to paraphrasing comments and making rebuttals, not on presenting any comments in full, or with a show of understanding. No planning viewpoints are exposed. No opportunities for reviewer interactions are encouraged.”

NPS Response: Appendix H of the JPP EA contains official correspondence related to the planning process and does not include public comment. All comments received from the public (including other agencies and consulting parties and the general public) were accepted during the public review process, reviewed, analyzed, and summarized in JPP EA Appendix I, Summary of Substantive Public Comments.

The NEPA process does not require an agency to publish public comments in an Appendix or in a separate document. The requirements are described in the following excerpt from the NPS Director’s Order 12 handbook describing the NPS responsibility to respond to public comments. The NPS has stated on page 127 of the 2007 JPP EA that “copies of the written correspondence are available for inspection at the NPS George Washington Memorial Parkway Headquarters at Turkey Run Park during normal business hours.” Generally, the NPS does not publish public correspondence in full due to the vast volume of material. The NPS is required to summarize substantive comments and may respond to other general issues and concerns contained in the public comment.

NPS Director’s Order 12 Handbook states:

“If reviewers send written comments, or submit comments at the discretionary public meetings, workshops, and so forth, the issuing office should screen them to determine whether any important new issues or reasonable alternatives or mitigation measures have been suggested. If major substantive issues not covered adequately in the EA are raised, or new alternatives the park wishes to consider are suggested, the EA must be rewritten to incorporate them and reissued for a second 30-day review upon completion. If any of the issues point to the potential for significant impacts, a NOI [Notice of Intent] to prepare an EIS [Environmental Impact Statement] should be prepared and submitted to the Federal Register.

If commenters correct or add factual information that has no bearing on the determination of significant impact, the information should be added to the text of the EA when possible. The issuing office may also respond through the use of errata sheets to comments that do not increase the degree of impact described in the EA. The combination of the EA and the errata sheets forms the complete and final record on which the FONSI [Finding of No Significant Impact] or decision to prepare an EIS is based. The FONSI itself is not an appropriate document to use to respond to public comments; rather, responses should be attached to the FONSI to complete the record. Issuing offices are encouraged to make text changes correcting or adding factual information to the EA and attaching the EA, along with the responses to public comments, to the approved FONSI to complete the administrative record.”

Concern Statement: Commenters claim the NPS has ignored input from the community and elected representatives.

Representative Quote: “The NPS plan ignores the proven needs of the greater community and the input of our elected representatives.”

Representative Quote: “The Alternative 4 plan designed by the NPS was not part of any earlier discussions with the city. The plans submitted by the city for consideration by

NPS went through extensive public review and studies. The first time the NPS Alternative 4 plan appears is in this Environmental Assessment [August 2006].”

Representative Quote: “The City's plan, called Alternative 1 with two full size fields north of the bridge, was debated and approved by City Council prior to September 11, 2001 and again after. Alternative 1 is also endorsed by the Park and Recreation Commission, Youth Sports Advisory Board, the Environmental Policy Commission and the Archeological Commission.”

NPS Response: As part of the NEPA process, the NPS consulted and coordinated with various agencies and organizations including the City of Alexandria (Department of Recreation, Parks and Cultural Activities, Department of Transportation and Environmental Services, Historic Alexandria Resources Commission, and Alexandria Archaeological Commission); the Federal Highway Administration; the Virginia Department of Transportation; the Virginia State Historic Preservation Office; and various local and civic community groups, including Yates Gardens Civic Association, Old Town Civic Association, and the Citizens for a Natural and Historic Jones Point Park. The NPS also conducted a public involvement program as identified in the JPP EA. This process began in 1998 and continued through the draft JPP EA submitted for public review in the fall of 2006. The NPS considered all public and agency comments in the development of alternatives presented in the JPP EA. The Preferred Alternative (Alternative 4), as shown in the JPP EA, was first presented to the public during a public scoping session (also presented in a newsletter made available to the public) where comments were accepted for a 30-day period in October 2005.

After considering comments obtained through the public review process of the 2006 JPP EA, the NPS modified the Preferred Alternative to include an additional multi-use field. Preferred Alternative 4A provides a balance of active and passive uses in JPP while ensuring the protection of natural and cultural resources.

Concern Statement: Commenters claim the NPS is bound by law to provide fields as mitigation for the WWB Project.

Representative Quote: “The federal government promised the City of Alexandria two full-size fields at Jones Point Park in the court settlement to mitigate the impact of the Wilson Bridge Project; the United States Congress approved the mitigation, the National Park Service is bound by law to abide, and the funds designated for these two fields can be used only at Jones Point Park.”

NPS Response: In January of 1998, the City of Alexandria filed an action (Civil Action No. 98-0251-SS (D.D.C.) against the U.S. Department of Transportation challenging the Record of Decision approving the WWB on various grounds regarding concerns the City had for historic preservation and environmental protection. Both parties entered into a Settlement Agreement in order to address mutual needs and interests. Among these was the design programs outlined for

JPP, including a conceptual drawing of two small fields which had been in existence for many years at JPP and used by the City to support athletic programs. The NPS owns and administers JPP, and has operated under a different agreement to allow the City of Alexandria use of the park for recreational fields. Furthermore, the NPS was not a signatory in the agreement between the City of Alexandria and the U.S. Department of Transportation, and is not bound by the terms of the agreement.

Vegetation and Water Resources

Concern Statement: Commenters who support Alternative 4 stated concerns over the removal of 2 acres of forest in Alternative 4A.

Representative Quote: “I am supporting Alternative 4, and my reasons are... to think that anyone would dream of chopping down almost 2 acres of beautiful old neighborhood trees is unbelievable, especially since they are one of the few protections from the noise and pollution of the WW Bridge!”

NPS Response: The commenter supported Alternative 4, which would impact 2.7 acres of trees. Alternative 4A would impact 2.9 acres of trees. The difference between the two alternatives is 0.2 acres of forest (not 2 acres of forest) as implied in the public comment. The JPP EA recognizes that in order to meet the needs and purpose of the improvements to JPP that certain impacts are necessary. In the analysis presented on page 89 of the EA, the NPS determined that 2.9 acres of forest loss mitigated by reforestation, results in a minor impact to JPP. Overall, the placement of fields and parking would be located on previously disturbed lands where significant tree species and forest do not exist. During the design and construction phase, consideration will be given to protecting as many trees as possible, especially along the access road where forest impacts are expected. The JPP EA contained an analysis that considered maximum spatial arrangements for improvements and impacts to resources. When possible, slight changes in design can determine if impacts to trees can be avoided. The NPS will take these into consideration at that time. Furthermore, the NPS is committed to providing reforestation in areas along the access road and other areas to the extent possible to maximize the existing vegetative buffer that protects the adjacent community from noise and visual impacts.

Concern Statement: Commenters questioned the level of analysis for impacts to trees indicating that trees smaller than 24-inch dbh were not represented, and that there was no rationale presented as to why 24-inch dbh as the threshold was used.

NPS Response: The analysis in the JPP EA focused on loss of forest habitat (which includes all vegetation in the area where forest would be impacted). The tree survey conducted in 2005 provided information about the location and

number of specimen trees, which are larger canopy trees 24-inch diameter breast height and larger. All reforestation efforts will include these large trees and other vegetation impacted (such as smaller trees). The JPP EA stated that forest will be replaced at a 1:1 replacement ratio. In other words, if 500 inches dbh of trees are impacted, 500 inches dbh of trees will be replaced in reforestation efforts. Please refer to the Errata in this document.

Concern Statement: Commenters stated that the JPP EA does not adequately address timelines and methods associated with reforestation and other natural methods associated with noise abatement and pollution screening.

NPS Response: The NPS will have a better estimate for the amount of vegetated buffer that can be maintained and planted in different areas of JPP during the design and construction phase, which would begin in 2008. Along the access road, it may be possible to avoid removal of trees by making minor shifts in the road alignment. A planting plan will accompany the design of the access road and parking. Depending on the size of tree material planted, any new vegetation that will be planted will require years of growth to reach a height where its mass effectively reduces noise levels and provides good visual screening. Noise abatement will primarily result from the Plexiglas noise wall erected on the bridge since the bridge is taller than mature trees.

Concern Statement: Commenters stated that off-site mitigation for loss of trees/forested area does not serve mitigation efforts outlined in the WWB FSEIS as relates to JPP.

Representative Quote: "Page 91 refers to there being a high likelihood that some of the reforestation required to compensate for lost forest habitat would need to occur off-site. This may satisfy City Council members and the soccer community that largely lives away from the area, but it will not satisfy those most impacted by the bridge for 'mitigation' efforts."

NPS Response: During the design and construction phase, the NPS will examine other areas within JPP that may be suitable for reforestation. It is standard practice within the NPS to provide for on-site mitigation to the maximum extent possible, and this will apply for the JPP improvements. The NPS values the need to provide adequate noise and visual barriers in the form of vegetated buffers, and will maximize these efforts as long as they do not conflict with archeological resources or other planned developments included in the JPP EA.

Concern Statement: Commenters stress that placing two regulation size fields in JPP will cause too much damage to existing wetlands, woodlands, and animal and plant species and habitat.

Representative Quote: “Location of two large playing fields and their accompanying parking north of the bridge maximizes the damage to the wetlands, woodlands, and animal and plant species that constitute so much of the park's natural value.”

Representative Quote: “Any significant change to these lands, such as clear cutting the forests and filling the wetlands, will clearly result in degradation of not only that land, but the surrounding lands and the native wildlife and plants which live there.”

NPS Response: Alternative 4A places one small field to the north of the bridge and one larger field south of the bridge. An access road and parking will be located north of the bridge. Approximately 0.4 acres of wetlands and 2.9 acres of woodlands will be impacted. Impacts to wetlands will include 0.2 acres of non-tidal forested wetlands associated with the construction of the access road, and 0.2 acres of tidal emergent wetlands associated with the Potomac River shoreline. One acre of woodland will be removed to expose the remains of the VSC Site for interpretation south of the WWB. The access road and perimeter barriers will impact approximately 1.4 acres of woodland. The tot lot and small recreational field north of the bridge will impact 0.4 acres of woodlands. Additional impacts from a pedestrian trail, parking, and a portion of the community gardens will be approximately 0.1 acres of impact. The total impact to woodlands comprises 10 percent of the total forested habitat in JPP.

Complete avoidance of all wetland and forest impacts is not possible while still accomplishing the purpose and need of the project. To manage resource impacts, several mitigation measures will be investigated and implemented. To replace impacted wetlands, the mitigation proposal would seek to create a non-tidal wetland in an open portion of land covered in exotic vines just east of Lee Street, which would connect to a large portion of existing forested wetland north of the bridge. Approximately 0.5 acres of wetland mitigation is proposed for the park. To reduce impacts to forested areas, efforts will be made to reforest portions of JPP including a buffer along the access road and the adjacent homes, treat and reforest invasive plant areas that have severely impacted existing forests, and avoid or minimize impacts to vegetation during design and construction of the improvements.

Concern Statement: Commenters indicate that assessment of tree loss as a result of parking in Alternative 1 is not properly evaluated.

Representative Quote: “When the City submitted our plan for parking, we said that it was conceptual in nature and that it would be laid out on the ground to avoid any of the large specimen trees. Yet the EA documents that it will cut down large specimen trees, and that is not true.”

NPS Response: The JPP EA analyzed the worse-case scenario with regard to these potential impacts even though there would be the possibility to mitigate them in design and construction.

Concern Statement: Commenters believe the planned fields will be made of Astroturf and will impact wetlands and adjacent neighborhoods by increasing the potential for flooding.

Representative Quote: “The City plans to Astroturf these fields which will increase the water runoff in the remaining wetlands and increase the potential for flooding.”

Representative Quote: “I am concerned about the series of floods that we have had in the two years I have lived in Alexandria, and that this additional development [fields, clearing trees, filling in wetland and more parking] is going to exacerbate the flooding conditions we have already seen.”

Representative Quote: “These fields and parking lot would be built in a FEMA floodplain, potentially forcing water elsewhere, as in our direction [adjacent residential property]...”

NPS Response: The multi-use fields at JPP will not be made of synthetic material but will use environmentally sensitive materials that will be installed at or near existing grade. To the maximum extent possible, the design of the field north of the bridge will be at-grade. In September 2005, a hydrology study and report was completed, the findings of which were included in the JPP EA. Refer to the *Hydrologic and Hydraulic Analysis Report - Jones Point Park Drainage Study*. Under Alternative 4A, the multi-use field to be located north of the WWB will be designed to properly drain and dispose of water. Alternative 4A concentrates improvements north of the WWB as far away as possible from the adjacent neighborhoods and the wetlands and woodlands on the north side of JPP. During design and construction, drainage improvements will include a properly graded field so as not to exacerbate drainage in that area.

Other proposed improvements at JPP include replacing a 24-inch culvert with twin 24-inch concrete culverts, building a new twin 36-inch culvert under the access road, and replacing twin 21-inch corrugated metal pipe. Culverts with a 2-foot by 6-foot box culvert will allow proposed storm water runoff to pass under the park roadways for the 2- through 10-year storm events and correct the small storm event flooding conditions currently being experienced in the park.

Concern Statement: Commenters in support of Alternative 4 stated that, if wetlands in Alternative 4A are removed, it could increase the flooding potential in adjacent lands.

NPS Response: The wetland impacts for Alternative 4A are the same as Alternative 4.

The Selected Alternative 4A places one small field to the north of the bridge and one larger field south of the bridge. An access road and parking will be located north of the bridge. Approximately 0.4 acres of wetlands would be impacted.

Impacts to wetlands will include 0.2 acres of non-tidal forested wetlands associated with the construction of the access road, and 0.2 acres of tidal emergent wetlands associated with the Potomac River shoreline. Complete avoidance of all wetland impacts is not possible while still accomplishing the Purpose and Need of the project.

To manage resource impacts, several mitigation measures will be investigated and implemented. To replace impacted wetlands, the mitigation proposal would seek to create a non-tidal wetland in an open portion of land covered in exotic vines just east of Lee Street, which would connect to a large portion of existing forested wetland north of the WWB. Approximately 0.5 acres of wetland mitigation is proposed for JPP, adding 0.1 acres of wetland more than what would be impacted.

Concern Statement: Commenters feel that more analysis is needed to evaluate floodplain impacts.

Representative Quote: "Page 14 Floodplains - it references that the WWB Replacement Project includes impacts to floodplains in JPP and, therefore, the EA does not further analyze this topic. The impacts in floodplains due to the WWB are totally different than adding a soccer/athletic field north of the bridge. This needs to be assessed further."

NPS Response: Recreational fields are consistent with appropriate uses in a floodplain. No permanent structures (i.e. lights, goal posts) associated with the fields would be in JPP. Although it will be necessary to bring in some fill to adequately grade the field surface for drainage, the proposed fields would remain as close to existing elevations as possible, and would not impede water flow especially during a flood event.

JPP, due to the proximity to the Potomac River, will be flooded during the 10-year storm event. Earth Tech, Inc. completed a *Jones Point Park Hydraulic Review Study* in April 2005. This report was completed to demonstrate that the construction of two multi-use fields in JPP would not affect the Potomac River flood elevations. Earth Tech, Inc. used FEMA flood flows that were used in the Maryland State Highway Administration's Conditional Letter of Map Revision process. These flows showed that, at the 10-year flood, the water surface elevation would be 6.8 feet, which will flood the park and will just begin to flood the residents northwest of the park. The ultimate planned improvements for JPP would correct the small storm event flooding conditions currently being experienced in the park by replacing culverts and directing storm water runoff.

Alternatives

Concern Statement: Commenters stress that Alternative 1 best separates active and passive uses of the park, which was a consideration for creating the best balance of competing park uses.

Representative Quote: “Not only are both passive/open space and active/recreation space provided by the plans [in Alternative 1], but they are separated by the new bridge so that each can function without interfering with the users of the other. The Park Service’s new “Preferred Alternative” completely ignores, and totally destroys, this balance.”

NPS Response: As a result of the public review period for the 2006 JPP EA, the NPS modified the Preferred Alternative to include an additional multi-use field. Alternative 4A provides one small field (80 x 40 YD) north of the WWB and a larger field (110 x 60 YD) south of the WWB. When balancing the uses of the park and resource protection, the NPS weighed the impacts of the loss of natural resources in the alternatives that placed fields only north of the bridge with that of other options. By placing one field north and one field south of the bridge, the park must compromise the creation of a fully passive area for JPP south of the bridge for the preservation of forested areas north of the bridge.

The difference between Alternative 1 (removes 4.1 acres of forest) and the Preferred Alternative 4A (removes 1.9 acres of forest) is 2.2 acres of forest. The south field will be designed to be as compatible as possible with passive uses. The south multi-use field would be moved closer toward the WWB to minimize impacts to the cultural resources of the VSC Site and D.C boundary line that will be adjacent to the multi-use field. The NPS feels that although a multi-use field will be present and in close proximity to the cultural resources, it will still be possible to provide enhancements to the cultural resources and interpretive opportunities without causing major impacts. In addition, when the multi-use field is not in use, the space will provide for passive recreational opportunities. For the protection of archeological resources, clean fill material will be placed over the area where the south field will be constructed, encapsulating the archeological resources to preserve them underground. Special measures during construction will provide necessary protection of archeologically sensitive areas.

Concern Statement: Commenters point out that Alexandria has other options for recreational fields, and that the City has identified land for possible use to build fields outside of JPP.

Representative Quote: “Alexandria has other options for recreational fields...Ben Bremen Park...Potomac Yard.”

Representative Quote: “On the subject of soccer fields, I also feel that less is better. As the parent of two boys who play under the Alexandria Soccer Association, I can tell you that in the 6 years we have been playing and with all of the construction involving the bridge and T.C. Williams School, we have never not had a place to play soccer. Parks are for greenspace with trees, not clear cut filled in wastelands.”

Representative Quote: “I do not think there is any room at Jones Point Park for soccer fields. The Woodrow Wilson Bridge Project has already downsized the park enough, and what little room is left, should be used for historical markers and water-related activities.”

NPS Response: The JPP EA examined the impacts of multi-use fields at JPP. Since the beginning of the planning process, the purpose and need for the action has included multi-use fields; therefore, every alternative has included this element. The City of Alexandria, operating under a permit with the NPS, utilizes and maintains the fields and other aspects of JPP. In determining the appropriate uses for JPP, the NPS has determined that two fields are compatible with the management of the park and resource protection. The NPS feels that the Preferred Alternative 4A strikes a balance between active recreational use and resource protection.

New Alternatives or Options Raised

Concern Statement: Commenters stated that the Alternative 4A fails to meet the goals of the City of Alexandria to separate active from passive uses of the park, and further state that the JPP EA did not consider modifying Alternative 1 to reduce and further analyze impacts.

Representative Quote: “The City's recommended plan (Alternative 1) is not modified in any way to diminish its impacts. The changes resulting from security considerations, and the final designation of the 80-foot standoff, opened opportunities for revision to further reduce impacts. Prominent for Alternative 1 would be to move the playing fields south and east hard against the stand-off line, and align both east-west (similar to Alternative 2). The parking and roadways would then be moved north of the fields and hard against the forested area, partly under tree cover. These changes to produce an Alternative 1A would reduce the loss of wooded lands and wetlands along their northern edge of the recreation area, and would accomplish the separation of passive and active recreation many desire.”

NPS Response: Modifying Alternative 1, as described, would result in equal or greater impacts to forest and wetlands than JPP EA Alternative 1, change the preferred alignment for the tot lot, and be contrary to NPS’ desire to maximize vegetative buffers between proposed developments and the adjacent neighborhood.

The NPS successfully operates numerous parks, both within the greater Washington, D.C. area and across the nation that balance active and passive recreational use with the preservation of historic above-ground and archeological resources. In Washington, D.C., perhaps the best example is the National Mall which on an annual basis accommodates numerous major public events, protests, and recreational uses, which are often loud and raucous. The NPS does not believe that these uses are inconsistent with the character, viewscape, or character of this National Historic Landmark, and the National Mall continues to be recognized for its architectural and symbolic importance to the nation even while these non-historic uses continue and increase. In other areas of Washington, D.C., NPS units associated with the Civil War Defenses of Washington such as

Fort Reno, Fort Stevens, and others, successfully balance active recreational use and protection and preservation of historic elements, both of which are important to the public.

Concern Statement: Commenters stated that a large field south of the WWB will diminish the historic value of JPP and does not strike the best balance between park uses and resource protection. Commenters suggested several options to avoid impacts.

Representative Quote: “Consideration should be given to one or a combination of the following options:

1. Eliminate the multiple-use field (athletic or soccer field),
2. Reduce the size of the soccer field to 80 X 50 (not 80 x 40) YD which is more suitable for recreational or youth soccer and would reduce the impact on historical and archaeology resources, and/or;
3. Regulate the frequency and time in which the field can be used for athletic events so as not to interfere with passive, interpretive and historic uses of JPP and reduce the wear and tear on the grass.”

NPS Response: The NPS successfully operates numerous parks, both within the greater Washington, D.C. area and across the nation, that balance active and passive recreational use with the preservation of historic above-ground and archeological resources. In Washington, D.C., perhaps the best example is the National Mall, which on an annual basis accommodates numerous major public events, protests, and recreational uses, which are often loud and raucous. The NPS does not believe that these uses are inconsistent with the character, viewscape, or character of this National Historic Landmark, and the National Mall continues to be recognized for its architectural and symbolic importance to the nation even while these non-historic uses continue and increase. In other areas of Washington, D.C., NPS units associated with the Civil War Defenses of Washington such as Fort Reno, Fort Stevens, and others, successfully balance active recreational use and protection and preservation of historic elements, both of which are important to the public.

Alternative 4A places a multi-use field (110 x 60 YD) south of the WWB. This size field is preferred for users at the high school level because of the need for more space, and accommodates more flexibility for a wider range of youth and other users. In order to make the field suitable for active uses, clean fill would be brought in and graded, but the intent would be to maintain the existing grade and appearance as much as possible. No permanent markings, goal posts or lighting would be allowed. Through the EA process, the NPS has determined that multi-use fields are in keeping with the protection and preservation of other natural and cultural resources in JPP without causing impairment or unacceptable impacts to natural and cultural resources or values. In addition, the NPS feels that multi-use fields are not a new recreational activity, and that the concepts for improving this

use date back even before the 1984 *Jones Point Park Implementation Plan*, making this use consistent with the purpose for which the park exists. If it becomes clear that the use of the multi-use fields is causing unacceptable impacts to park resources and values, the GWMP Superintendent can place limitations on the use or even prohibit the activity.

Concern Statement: Commenters stated that options to place multi-use fields directly under the WWB similar to other activities were not considered.

Representative Quote: “If placing a comfort station, basketball courts, a fishing pier, and a canoe/kayak launch station in the restricted area under the bridge is allowed by security authorities (as shown in preferred Alternative 4A) then they can have no objection to putting the rectangular multi-use playing fields there as well. Any visitor to the site can see that two large fields would fit there. Thus, there is a simple way to accommodate city and NPS interests at Jones Point Park. This is not a new idea, but, given the revised drawing released by the NPS last month (Alternative 4A), it may be a concept whose time has come.

There is room between the first and second set of bridge supports and between the second and third set of bridge supports (starting from the river) to fit in the two large rectangular athletic fields that the City of Alexandria needs provided the surface is modern artificial turf. Such an approach would require some increased initial cost (compared to grass fields) but only minimal maintenance. Some minor rerouting of several walking paths, and relocation of the basketball courts and the comfort station to the space between the third and fourth set of bridge supports (which is shorter because of the big tree on the South side that is to be preserved and slightly lower because of the slope of the bridge -- where nothing is planned now) would also be required.

Unless the drawing of NPS Alternative 4A is dramatically out of scale, a careful look at the drawings easily prove the feasibility of this idea - even if Old Jones Point Road is retained. Moreover, unlike the old bridge, neither overhead clearance nor light will be a problem for sports such as soccer because of the soaring height of the new bridge as it gets close to the river. Placement of the fields parallel to the river in the center of the available space between the bridge supports would eliminate any concern about overhang even if much wider fields are chosen and there would be plenty of room for spectators, paved walking paths, etc. Backstop fencing beyond the end of the fields could be incorporated into the security barriers that will parallel the bridge.”

NPS Response: This concept was considered early in the planning process but not moved forward because the location was believed to be undesirable for recreational fields. The reasons for this include: poor aesthetic value for field users and spectators playing beneath a large bridge; the spacing between bridge piers would not allow safe clear zones on the field perimeter; overwhelming opinion against the use of synthetic materials (grass would not grow under the bridge); and droppings from nesting birds and other falling overhead bridge

material would be a concern. For these reasons, the NPS did not wish to consider this option.

Cultural Resources

Concern Statement: Commenters stated that interpretive resources outside the boundary of JPP should be considered in the discussion of the EA.

Representative Quote: “In the discussion of Cultural Resources, beginning on page 32, I find no description or reference to two sets of plaques which should interest visitors and reinforce their understanding of the National Park. The first is the Battery Rodgers plaque at the east end of Green Street. The second is the set of seven plaques in the Fords Landing City Park at the east end of Franklin Street. These seven cover the entire history of the Jones Point area from pre-historic times through the Civil War, the dredging and filling which created much of the northern park parcel, the ship building activities, and the Ford Assembly Plant (1932-1996). They may be accessed by a footpath extending from the northeast corner of Jones Point Park, along a bikeway and the riverfront; just as the Battery Rodgers plaque is passed when entering the Park along the Lee Street path.”

NPS Response: In conjunction with the JPP EA, the NPS has written a preliminary interpretive development plan that will be used to plan and design the improvements mentioned in the 1997 MOA to enhance historic and cultural resources at JPP. Battery Rogers is included in the plan as an historic site outside of JPP. The NPS acknowledges that these resources contain a commonality that may add some benefit to the development of interpretive resources at JPP, and encourages the commenter to send a separate letter describing the importance and relationship these resources have to each other so that they may be considered during subsequent planning and development of the JPP improvements.

Environmental Consequences – Neighborhoods

Concern Statement: Commenters indicated that the JPP EA does not give adequate mention of the adjacent residents directly impacted by the actions.

Representative Quote: “Page 67 – failure to recognize in mitigation section mention of population most affected by the bridge development – the adjacent community. Addition of fields exacerbates impacts that already exist.”

NPS Response: Page 67 discusses mitigations relating to visitor use and experience. The comment appears to refer to a different environmental issue (Neighborhoods, Community Facilities, and Services). Page 51 of the 2007 JPP EA states:

“A tree buffer would remain between the vehicle access road in the park and the Yates Gardens neighborhood to reduce potential visual and noise effects. The Lee Street community garden would be reconfigured and extended north to maintain the same amount of land available for public gardening.

Mitigation measures may include scheduling of park construction to occur during times of low usage, scheduling construction during least disruptive hours, and provision of secondary access during construction. Temporary paths to and through the area and detour/guide signs are among the tools available to facilitate pedestrian and vehicle movements during construction.

Public information programs would advise area residents and park patrons of the timeframe for construction activities. Notification would occur through press releases; notices on the NPS, City of Alexandria, and WWB Replacement Project websites; and posted signs at the park. The NPS would continue public involvement activities throughout planning and design activities.”

In Alternative 4A, the NPS has included modifications that address concerns voiced by the neighborhood. Providing a vegetative buffer to the maximum extent possible and locating developments away from adjacent neighborhoods minimizes noise and visual impacts that could occur from active recreational uses compared to other alternatives.