



FINDING OF NO SIGNIFICANT IMPACT

MacArthur Boulevard Shared-Use Path at Glen Echo Park

Glen Echo Park Glen Echo, Maryland

The George Washington Memorial Parkway (GWMP), an administrative unit of the National Park Service (NPS), is proposing to provide a Special Use Permit to Montgomery County, Maryland for the relocation of approximately 800 feet of the MacArthur Boulevard Shared-Use Path onto NPS administered property at Glen Echo Park (GEP) and the Clara Barton National Historic Site (CBNHS). The MacArthur Boulevard Shared-Use Path Project is part of Montgomery County's MacArthur Boulevard Bikeway/Lane Improvements Project that extends from I-495 to Oberlin Avenue in southwest Montgomery County, Maryland and is currently being designed by the Montgomery County Department of Transportation (MCDOT). The project was originally proposed in 2003 by MCDOT in order to "upgrade the existing shared-use path to current standards, promote usage, enhance safety for all users, and to improve the safety of bicycling on the MacArthur Boulevard roadway to better serve the experienced cyclist." Design for the project has been ongoing since 2003; however, due to a number of safety concerns with the original plans, including the narrowing of the shoulder in the vicinity of the intersection with Goldsboro Road, MCDOT approached NPS to determine the feasibility of shifting approximately 800 feet of the shared-use path onto federal land administered by NPS, the Cabin John Trolley Right of Way (Cabin John ROW) in the vicinity of GEP and CBNHS.

The project is located in the Town of Glen Echo, Montgomery County, Maryland along the unused ROW of the former Washington Railway and Electric Company, also known as the Cabin John ROW or the Brookmont Trolley ROW. The full Cabin John ROW extends from Georgetown, Washington, DC to Cabin John Creek, Maryland; NPS acquired most of the ROW by purchase in 2007, including the project site. For the purposes of defining the project site in this document, the Cabin John ROW is the portion of the ROW running from Oxford Road to the area adjacent to the original entrance to Glen Echo Park. The Minnehaha Branch, a small tributary of the Potomac River, crosses the project site from northeast to southwest. MacArthur Boulevard, a major commuter route between county suburbs and the District of Columbia, delineates the northern and eastern boundaries of the project site. Oxford Road is the western boundary. The southern boundary is located approximately forty feet from the centerline of the proposed alignment, namely the Cabin John ROW. There is an access road and an upper parking lot for visitors, students, and employees of GEP located on the project site southwest of Minnehaha Branch along MacArthur Boulevard, which is administered by the US Army Corps of Engineers.

The purpose of the proposed action is to provide a safe location for the shared-use path component of the Montgomery County Bikeway/Lane Improvements Project between Oxford Road and the original entrance to GEP in such a way as to ensure the protection of park resources and values as provided for in GWMP's enabling legislation, GEP's purpose, mission and goals and to limit to the maximum extent practicable, impacts to the integrity of the National Historic Site at Clara Barton House.

The proposed action is needed to improve the safety of the existing bikeway, which currently lacks proper identification signage, pavement markings, lane designations, and vehicular and bikeway approach signs. The path is not physically separated from the roadway and does not meet current American Association of State Highway and Transportation Officials (AASHTO) standards.

Coordination has occurred with the following agencies: US Army Corps of Engineers (USACE), the US Fish and Wildlife Service (USFWS), the Maryland Department of the Environment (MDE), the Maryland Department of Natural Resources (DNR), and the State Historic Preservation Office (SHPO) - Maryland Historic Trust (MHT)

In accordance with the National Environmental Policy Act of 1969 (NEPA), the Council of Environmental Quality (CEQ) regulations (40 CFR 1500-1508), and NPS Director's Order #12, the NPS prepared an Environmental Assessment (EA)/Assessment of Effect (AoE), which was released for agency and public review and comment. This document is intended to fulfill requirements mandated by NEPA, Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and the procedures of the Advisory Council on Historic Preservation (ACHP). It should be noted that the project is exempt from the requirements of Section 438 of the Energy Independence and Security Act of 2007, as the total area of ground disturbance is only 4,500 square feet, which is less than the threshold of 5,000 square feet.

After review of the MacArthur Boulevard Shared-Use Path at Glen Echo Park Environmental Assessment/Assessment of Effect (EA/AOE), consultation with the aforementioned agencies and the Glen Echo Park Partnership for Arts and Culture (GEPPAC), and in accordance with 43 CFR 46.320, the NPS is adopting this EA and making its decision to issue a Special Use Permit for the construction of the MacArthur Boulevard Shared-Use Path along the Cabin John ROW, as well as the rehabilitation and adaptive re-use of the existing trolley bridge over Minnehaha Branch. This EA/AOE fulfills the requirements of NEPA and other applicable regulations, including Section 106 of the NHPA. It also meets the policies set forth in the NPS's Director's Order 12, Conservation Planning, Environmental Impact Analysis and Decision-Making, and accompanying Handbook.

SELECTED ALTERNATIVE

NPS accepts the preferred alternative and has selected it for implementation. The selected alternative will allow the NPS to grant MCDOT a Special Use Permit to construct the shared-use path. Under the selected alternative, an eight-foot wide asphalt pathway will be constructed from Oxford Road in a southeasterly direction to the existing trolley bridge over Minnehaha Branch and will continue south past the bridge for approximately 30 feet. It will then curve to the east and uphill to the existing upper parking lot along MacArthur Boulevard, which is used by visitors and employees of GEP. It will cross the upper parking lot, (which is approximately 75 feet wide) perpendicularly on a well-marked, raised surface and then curve southward to join the existing bikeway alignment parallel to MacArthur Boulevard. Up to eight parking spaces may be lost where the path crosses. Montgomery County will construct the shared-use path; however, NPS will maintain the section that uses the Cabin John ROW. NPS will administer the shared use path on federal property to NPS standards and without input from Montgomery County, including the right to close the trail when needed.

The shared-use path will be constructed primarily on fill materials to maintain a maximum five percent change in grade as required by the Americans with Disabilities Act (ADA). A 15-inch reinforced concrete pipe will be placed under the fill to manage drainage that currently flows through an open ditch between the upper parking lot and the trolley ROW. Clearing will be required to remove undergrowth and trees that have encroached upon the Cabin John ROW and in the area between the upper parking lot and the ROW south of the bridge.

New landscaping will consist of appropriate native trees, shrubs, and grasses so as to be compatible with the historic settings and surroundings. Signage along the trail and pavement markings will meet or exceed the current standard for facilities of this type, and will provide warning and direction for both trail users and vehicles, as appropriate. The NPS will be responsible for the final design of any additional signage, including interpretive signage, along the trail.

The trolley bridge over Minnehaha Branch will be adapted and re-used to accommodate bicycles and pedestrians. Rehabilitation through adaptive re-use will be undertaken in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. Initial tasks include photographic documentation of the current condition of the structure prior to the initiation of work. Other tasks include the following:

- The existing timber deck will be removed and disposed of in accordance with all applicable state and local regulations.

- The abutments will be power-washed to remove efflorescence, stains, and loose concrete and establish a uniformly clean surface. The contractor will be required to contain the waste and prevent any from infiltrating the ground or adjacent stream. Once cleaned, cracks and other deteriorated areas, including the back walls will be repaired according to industry standards. No changes in grade will be required at either abutment, but rip rap stone from a local quarry will be used along the downstream side of the southern abutment in order to stabilize the existing slope. The stone will be placed on top of the existing grade and cover an area approximately three feet wide along the length of the abutment.
- New wing wall tie-back rods will be installed at both bridge abutments to ensure structural integrity. Installation will consist of excavating old fill from between the wing walls, installing new 1" steel tie-back rods, and then replacing and compacting appropriate fill materials to create the sub-grade for the trail pavement section. The only outward sign of this activity when complete will be three one-foot square plates with the 1" steel rods on each side of the abutments, which will be minimally perceptible from the downstream bridge over Minnehaha Branch that connects the main visitor parking area with GEP.
- Upon completion of the repairs, the substructure will be painted and coated, as needed.
- The truss bearings at both abutments will be replaced and the beam seats will be reconstructed. This will consist of jacking the trusses, repairing and/or replacing the bearing assemblies, and resetting the trusses. Jacking the bridge at the northern abutment will require a temporary stream diversion of Minnehaha Branch for approximately six weeks and will be completed in accordance with the MDE's Waterway Construction Guidelines. A diversion will not be required for the southern abutment repairs. A permit from USACE and MDE may be required for this work.
- Once the truss bearings and beam seats are finished, the structural steel will be cleaned and painted.
- A new timber deck and railings, similar in style to those used on the downstream bridge over Minnehaha Branch will be installed. The railings will be designed in cooperation with NPS staff to ensure that they meet the *Secretary of the Interior's Standards for the Treatment of Historic Properties* with regard to both historic structures and cultural landscapes.

OTHER ALTERNATIVES CONSIDERED

Council on Environmental Quality (CEQ) regulations for NEPA compliance requires that a "no action" alternative be considered to provide a baseline for comparing the action alternatives. Under the no action alternative, NPS would not provide the Special Use Permit for the shared-use path. The existing path would remain in its present location until planned improvements are made to MacArthur Boulevard and the rest of the shared-use path. Once the improvements are made, a three-foot wide shoulder would be provided to accommodate on-road cyclists; however, the shared-use path for recreational pedestrians and bicyclists would end at Oxford Road. Recreational users would have to use the shoulder to continue their journey or make a detour from Oxford Road through the main visitor parking area for GEP and the CBNHS, cross the bridge just downstream from the trolley bridge and traverse through GEP to rejoin the improved shared-use path east of the GEP entrance. The no action alternative was not selected because it does not meet the purpose and need for the project; rather, it introduces additional user conflicts on a narrowed shoulder, which would pose greater risk to users since there would be no physical separation from the cars driving on MacArthur Boulevard.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The NPS is required to identify the environmentally preferable alternative in its NEPA documents for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and CEQ's *NEPA's Forty Most Asked Questions*, defines the environmentally preferable alternative (or alternatives) as the alternative that best promotes the national environmental policy as expressed in NEPA (Section 101(b) (516 DM 4.10)). In their *Forty Most Asked Questions*, CEQ further clarifies the identification of the environmentally preferable alternative, stating "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).

After completing the environmental analysis, the NPS identified the no action alternative as the environmentally preferable alternative because there would be no new impacts, and therefore, would best protect park resources and values. While the selected alternative is not the environmentally preferable alternative, it was chosen because it best meets the purpose and need of the project while avoiding and mitigating environmental impacts to the greatest extent possible. In addition, the selected alternative will have long-term beneficial impacts as it provides a safer shared-use path and provides additional opportunities for interpreting and accessing the park's natural resources.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented as part of the selected alternative. The NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

General Mitigation Measures

- The NPS Project Leader will ensure that the project remains confined within the parameters established in the compliance documents and that the mitigation measures are properly implemented by Montgomery County.
- Information on the project and temporary impacts during construction will be made available on the GWMP/GEP and GEPPAC websites, as well as in the GEP visitor center.
- Protection measures will be clearly stated in the construction specifications and workers will be instructed to avoid conducting activities beyond the construction zone.
- Areas damaged due to work on the project will be repaired to original condition wherever possible.
- The County will make sure that their contractors properly maintain construction equipment (i.e., mufflers) to minimize noise from use of the equipment.
- A hazardous spill plan will be in place, stating what actions will be taken in the case of a spill and identifying preventive measures to be implemented, such as the placement of refueling facilities, storage, and handling of hazardous materials, etc.

Equipment used on the project will be maintained free of externally applied petroleum-based products while working at the project location.

Wetland and Stream Mitigation Measures

- Minnehaha Branch will be protected during construction using erosion and sediment control measures in accordance with MDE regulations, such as silt fencing that is installed without digging and daily stabilization of disturbed areas per contract specifications.
- A Cleaning Containment System Plan will be developed and approved prior to starting the cleaning and painting of the trolley bridge to protect Minnehaha Branch. Elements of the plan will be in accordance with Section 436 of Maryland State Highway's Standards Specifications for Construction and Materials. The selected contractor will be required to design the system, including the paint removal apparatus, curtains, screens, and tarpaulins for containment, rigging, and ventilation, as necessary.
- Pre- and post-construction stream sediment and paint sampling and analysis for metals will be completed by Montgomery County in order to monitor water quality. Pre-construction analysis was completed in March 2010.
- No vehicles or heavy equipment will be permitted in the stream area.

Soil Mitigation Measures

- To the extent possible, construction in areas with steep slopes will be avoided.

- An appropriate Erosion and Sediment Plan will be implemented as per MDE's 2011 Standards and Specifications for Soil Erosion and Sediment Control, which is incorporated by reference into COMAR Title 26, Subtitle 17.
- Disturbed areas will be kept as small as practical to minimize exposed soils and the potential for erosion by utilizing appropriate ground protection such as matting in areas where heavy machinery is being moved
- Waste and excess excavated materials will be located outside of drainages to avoid sedimentation
- Erosion control measures will be installed around the perimeter of any stockpiled fill material prior to construction as directed by NPS
- The County's contractor will conduct regular site inspections during the construction period to ensure that erosion-control measures are properly installed and are functioning effectively
- Chemicals, fuels, and other toxic materials will be stored, used, and disposed of in a proper manner
- Disturbed areas will be re-vegetated as soon as possible after construction is completed.

Vegetation Mitigation Measures

- Construction areas will be restored and re-vegetated with native species.
- Impacted native trees in excess of six inches diameter at breast height (dbh) will be replaced with trees of equivalent dbh or through monetary compensation as approved by the Regional Natural Resources Manager. Fifty-three trees have been identified for a total of 515 inches dbh.
- Before arriving on site, all equipment will be power washed to ensure that seeds from invasive species are not transported to the project area.
- Non-native vegetation will not be introduced. Disturbed areas will be monitored by the County for three years following construction to identify growth of noxious weeds or non-native vegetation. Treatment of non-native vegetation will be completed in accordance with NPS-13, Integrated Pest Management Guidelines.
- Vegetation impacts and potential compaction and erosion of bare soils will be minimized by replacement of topsoil in as near the original location as possible, followed by scarification, mulching, and seeding/planting with species native to the immediate area.
- Topsoil, straw, etc. will be used on the site must be certified weed/seed free.
- To maximize vegetation restoration efforts after completion of construction activities, the following measures will be implemented:
 - Topsoil from construction areas will be salvaged for re-use during restoration of disturbed areas.
 - The County will monitor re-vegetation success for three years following construction, and will implement remedial and control measures in cooperation with NPS as needed.

Wildlife Mitigation Measures

- Pre- and post-construction water quality sampling will be used to monitor water quality.
- Native plants will be used to replace cleared vegetation.

Cultural Resource Mitigation Measures:

- A Phase I Archeological Survey was completed in areas where ground disturbance is anticipated. Results of the investigations indicate that a large portion of the APE was graded and prepared for rail tracks associated with the electric railroad/trolley system that provided service out to Glen Echo and Cabin John. Overall, the results of the survey indicate that there were no identifiable diagnostic archeological materials, i.e. items over 100 years of age, within the soils excavated during the survey. However, in addition to

limiting construction activities to the defined APE, the following mitigation measures will be implemented.

- If previously unknown archaeological resources are discovered during project construction, the Park Cultural Resources Program Manager will be contacted immediately. All work in the immediate vicinity of the discovery will be halted until the resources could be identified and documented and an appropriate mitigation strategy developed, if necessary. The significance of these finds will be assessed in consultation with the Maryland SHPO.
- In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3002) of 1990 will be followed. All human remains, funerary objects, sacred objects, or objects of cultural patrimony will be left in place until the culturally affiliated tribe, or tribes are consulted and an appropriate mitigation or recovery strategy developed between the affiliated tribes, SHPO, and the NPS.
- Rehabilitation through adaptive re-use of the trolley bridge will be undertaken in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties*.
- Landscaping treatments will include native plants and local materials so as to be compatible with the historic settings and surroundings.

Transportation Mitigation Measures:

- Signing for the shared-use path will be compliant with the Manual of Uniform Traffic Control Devices (MUTCD) and Federal Highway Administration recommendations to ensure the safety of all users and to reduce conflicts between vehicles, cyclists, and pedestrians.
- Pavement markings at all intersections of the shared-use path and local roads and at the crossing in the upper parking lot will meet current standards to ensure visibility.

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

The NPS has determined through consultation with MCDOT, the NHPA Section 106 process, and review of the EA, that the selected alternative can be implemented without significant adverse effects. As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an EIS: As described in the EA, several resource areas will experience both beneficial and adverse impacts from the proposed actions; however, on balance, no significant impacts were identified that will require analysis in an EIS.

Topography – The existing topography was maintained to the extent possible to minimize adverse impacts. Approximately three to four feet of fill will be used to adjust the grade at Oxford Road and between the trolley bridge and the upper parking lot in order to achieve the grade necessary to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). A small cut will be needed along north side of the trail approximately 200 feet northeast of the trolley bridge. The limits of the necessary grade changes were minimized as much as practical while achieving the benefit of making the trail ADA accessible.

Hydrology and Water Quality – Minor adverse impacts to hydrology and water quality will be mitigated on the shared-use path pavement between Oxford Road and the Minnehaha Branch by directing and dispersing run off over grassy surfaces or woodland areas. Minor adverse impacts to hydrology and water quality will be mitigated in the area between Minnehaha Branch and the GEP upper parking lot by using an appropriately sized and placed concrete pipe to carry drainage under newly placed fill; this would replace an existing drainage ditch. During construction, potential minor adverse impacts to water quality will be mitigated or eliminated by using appropriate erosion and sediment control procedures and approved containment systems.

The project complies with Chesapeake Bay Protection and Restoration Executive Order 13508 by limiting impacts to hydrology and water quality to mainly short-term adverse effects. In the long term, even though there is increased impervious area added to the watershed, the additional area is minor in extent, much of the runoff will go overland before entering open receiving waters, and a minor increase in the switch to non-polluting modes of transportation is anticipated.

Wetlands – Temporary minor adverse impacts to wetlands will be minimized by ensuring the diversion at the northern abutment occurs during low water and installing the sandbags using best management practices. They will be further mitigated by minimizing the amount of area needed to complete the repairs on the bridge abutments. Upon completion of the repairs, the sandbags will be removed, thus allowing the stream to return to its normal flow pattern.

Vegetation – Minor adverse impacts associated with the loss of 53 trees within the limits of disturbance along the proposed alignment of the shared-use path will be mitigated by replanting with NPS approved native trees and shrubs, as well as grasses on both sides of the shared-use path between Oxford Road and the trolley bridge and from the bridge to the upper lot crossing. The County will be responsible for maintaining the new plantings for the first three years to ensure survival, as well as for controlling invasive species within the new planting areas. Due to the limited amount of space available at the project site, only four of the 258 trees required for mitigation can be planted on the site. A total of 47 native shrubs, as well as a mix of native grasses, will also be planted. Arrangements will be made for the County to provide \$32,000 in financial compensation for the trees as approved by NPS.

Wildlife – Minor adverse impacts to wildlife habitat associated with the loss of tree cover will be minimized by limiting the number of trees removed to those within the identified limits of disturbance. They will be further mitigated by using native plants to replace cleared vegetation. No construction activities will be permitted between February 15 and June 15 as directed by DNR to avoid any potential impacts to spawning fish in the downstream reaches of Minnehaha Branch.

Scenic Resources – Minor adverse impacts to scenic resources as a result of the removal of the trees will be mitigated by replacing them with new trees and shrubs along the trail.

Archaeological Resources – The Phase 1 Archeological Survey completed by NPS in 2012 concluded that the area within the proposed limits of disturbance for the shared-use path was previously disturbed. Therefore, it is unlikely that the selected alternative will affect archeological resources. However, if previously unknown archaeological resources are discovered during construction, the GWMP Cultural Resources Program Manager will be contacted immediately. All work in the immediate vicinity of the discovery will be halted until the resources could be identified and documented and an appropriate mitigation strategy developed, if necessary. The significance of these finds will be assessed in consultation with the Maryland SHPO.

Historic Structures and Districts – Minor adverse effects associated with the addition of the railings on the trolley bridge will be mitigated by rehabilitating the structure in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. MHT has concurred that the "...undertaking will have no adverse effect on historic properties" in their correspondence to NPS dated February 2, 2013, attached.

Cultural Landscapes – Minor adverse impacts associated with the addition of the asphalt shared-use path, the bridge railing, and new signage to the cultural landscape will be mitigated by adhering to appropriate standards, as well as replacing lost trees. While the shared-use path would be a new element, it will utilize a historic transportation corridor and provide the opportunity for interpretation.

Visitor Use and Experience – Minor, short term adverse impacts to visitor use and experience will be primarily associated with construction activities and will be mitigated to the extent possible. Contractor activities will be limited to specific areas and the closure of the upper parking lot will be as short as possible. Ultimately, there will be beneficial impacts on the visitor experience in the form of the new shared-use path and improved access to the trolley bridge, which is an historic element of the cultural landscape, as well as through new interpretive exhibits and by providing another opportunity to view and enjoy Minnehaha Branch.

Transportation – Minor, long term adverse effects on parking in the upper parking lot may be mitigated by providing alternative spaces closer to the main entrance of GEP on MacArthur Boulevard. Construction of the selected alternative will result in the loss of up to eight parking spaces in the upper parking lot. While parking tends to be at a premium at the park, particularly during large events, during normal operations, there is sufficient parking in the Main Visitor lot.

Human Health and Safety – Minor, short term adverse effects associated with bicyclists and pedestrians crossing in the upper parking lot will be mitigated by locating the crossing approximately 100 feet south of the existing entrance on a raised surface so that drivers will have time to see the crossing. Additional safety measures will include appropriate signing and striping for both drivers and pedestrians. There will also be long term benefits to human health associated with improved pedestrian safety as the new shared-use path will allow pedestrians and less experienced cyclists to avoid using the MacArthur Boulevard shoulder.

Park Management and Operations - Moderate adverse impacts of the selected alternative on park management and operations associated with the maintenance of the trail and trolley bridge will be mitigated by planting native species selected for the conditions of the site, as well as having the County implement a three-year monitoring/care program to ensure that the new plants are successfully established. Re-striping will occur as part of the regular parking lot maintenance and bridge maintenance will be limited to regular inspections. This additional work may require some rearrangement of management staff workloads and priorities, but should not reduce or eliminate ongoing programs.

Degree of effect on public health and safety: Implementation of the selected alternative will result in beneficial impacts on public health and safety as the new shared-use path will separate pedestrians and less experienced cyclists from the roadway, as well as from experienced cyclists using the shoulder of MacArthur Boulevard. Temporary minor adverse impacts associated with bicyclists and pedestrians crossing in the upper parking lot will be mitigated through the use of signage, striping, and other design elements to make the trail visible. In addition, the impacts will affect a relatively small number of visitors and employees who park in the upper parking lot.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas: No prime farmlands, wild and scenic rivers, ecologically critical areas, sites sacred to American Indians, or other ethnographic resources occur within or adjacent to the Project Area, and none will be impacted by the actions associated with this alternative.

The selected alternative will have negligible to minor adverse impacts on historic resources. Impacts to archeology from grading and the installation of new plants within the APE are not expected to cause disturbance to archeological resources based on the Phase I Archeological Survey results. There will be minor adverse impacts to the trolley bridge because of the addition of the new hand railings, however all work done on the bridge will with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Minor adverse impacts to the cultural landscape are also anticipated due to minor changes in topography, the loss of trees, and the new asphalt pathway.

The selected alternative will also have short term, minor adverse impacts to Minnehaha Branch, the only wetland within the project area. This is due to the construction of a stream diversion needed to complete repairs on the northern bridge abutment. Temporary sandbags would be used to keep water out of the area where the jack would be placed to support the bridge during repairs. The diversion would be placed approximately 8 feet from the northern abutment and would impact approximately 450 square feet of the wetland area for approximately six weeks. This diversion would have a minor short term adverse impact on the aquatic life that may exist in this area of the stream due to the temporary dry stream conditions

A Statement of Findings (SOF) for wetlands was not required for this EA because the impacts to the wetland will be temporary and will impact approximately 450 square feet, which is less than the threshold of 0.1 acres. NPS Director's Order (DO) #77-1 Wetland Protection requires a SOF that documents compliance with the DO for proposed actions that would result in adverse impacts on wetlands. However, Procedural Manual #77-1:

Wetland Protection, which was developed to assist with the implementation of DO #77-1, does provide for certain exceptions to this requirement. The construction of the selected alternative qualifies for exception under section 4.2.1(g) Maintenance, repair or renovation

Degree to which effects on the quality of the human environment are likely to be highly controversial: There were no highly controversial effects identified during either preparation of the EA/AOE or the public review period.

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 or unique or unknown risks identified during preparation of the EA/AOE or the public review period.

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 selected alternative 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: The EA/AOE considered the cumulative impact of the selected alternative with several past, present, and future actions in the project area. The analysis indicated that there could be cumulative impacts; however, they are minor in intensity, with the selected alternative having negligible contributions to the overall cumulative impact.

As described in the EA, past, present and future actions and projects within the project area that could affect park resources include: the abandonment of the trolley and the removal of track, reconstruction of the parking lots, restoration of the Minnehaha Branch, “topping” of trees along the Cabin John ROW, establishment of GEPPAC, minor improvements to the upper parking lot, development of the cultural landscape inventory for GEP and CBNHS, building a new maintenance facility on park land; replacing the roof of the bumper car pavilion, the carousel, and the Clara Barton House; and repaving pathways at GEP.

Removal of the trolley tracks has had negligible impacts to topography. The reconstruction of the parking lot after the collapse in 1989 has had a beneficial impact, as it restored some of the natural undulations of the terrain and removed some of the pavement. The restoration of Minnehaha Branch has also had a beneficial impact on the topography as the stream channel south of the trolley bridge was day-lighted and re-established. Cumulatively, the use of fill to construct the selected alternative will result in minor, long term adverse impacts on the topography.

Restoration of the downstream reaches of the Minnehaha Branch has had a beneficial impact on hydrology and water quality in the drainage area. Non-point source pollution from runoff will have minor long term adverse impacts on hydrology and water quality. Cumulatively, the impact of runoff associated with the new impervious surface of the selected alternative along with the impacts of continued non-point source pollution from runoff off site will result in minor, long term adverse impacts on hydrology and water quality.

Cumulatively, the impact of the selected alternative on vegetation will be minor, long term and adverse as there will be perceptible, localized changes to the existing plant community, such as a loss of tree canopy and the potential loss of other plants that rely on the shade provided by the trees. Continued topping of the remaining trees under the utility lines will have minor, long term adverse impacts on the trees as each successive pruning weakens the trees.

Continued topping of the remaining trees could have minor, long term adverse impacts on wildlife as habitat is removed. The cumulative impact of the selected alternative on wildlife will be minor, long term and adverse as a result of the loss of vegetated habitat, and greater use of the area by visitors and trail users, which may discourage wildlife from using the area.

The cumulative impact of the selected alternative on scenic resources will be minor, long term and adverse. The removal of some trees along MacArthur Boulevard between Oxford Road and the trolley bridge will allow

some portions of the shared-use path to be visible from MacArthur Boulevard and conversely, some portions of MacArthur Boulevard will be visible from some areas of the Park.

The abandonment and removal of the trolley tracks has resulted in the deterioration of the trolley bridge which is a minor, long term adverse impact. Although the selected alternative will not restore the bridge to its original condition, it will result in its re-use, thus limiting further deterioration or complete loss of the resource. Roof repairs within GEP and at the Clara Barton House will have beneficial impacts to other historic structures within the park unit. Cumulatively, there will be long term minor adverse impacts to historic structures at GEP under the selected alternative due to the introduction of the new hand railings on the trolley bridge.

Cumulatively, the selected alternative will have a moderate adverse impact on park management and operations due to the need to provide maintenance of the vegetated areas along the ROW after the County's three-year maintenance period ends, and of the paved trail itself in perpetuity.

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: For the purposes of NEPA, the selected alternative will have a minor, long term, adverse impact on the trolley bridge due to the addition of the new deck and hand railings. Proposed alterations to the bridge may have a minor adverse visual impact on the GEP Historic District and the CBNHS. In addition, visual impacts will result from the installation of other non-historic elements within the landscape, including the new asphalt path and the railings and signage that will accompany it. Under the selected alternative, the trolley bridge will be rehabilitated, adapted, and re-used to carry the shared-use path over the Minnehaha Branch. Most of the work on the bridge will involve repairing existing features to ensure the integrity of the supporting structures and will not be visible. New timbers will replace those that still remain on the bridge and a railing will be added to ensure safety. The rehabilitation of the trolley bridge will be undertaken in accordance with *The Secretary of the Interior's Standards for the Treatment of Historic Properties* to minimize detrimental impacts to the character defining features of the structure. The installation of the railing will constitute a minor, long term, adverse impact under NEPA, but no adverse effect for the purposes of Section 106.

The trolley bridge is adjacent to the GEP Historic District and is also visible from the CBNHS. The addition of the railing may constitute a long term, minor adverse visual impact on these resources under NEPA and no adverse effect under Section 106.

As part of the NHPA Section 106 process, MHT provided a list of historic sites and districts in the vicinity of the entire MacArthur Boulevard/Lane Improvements project as part of MCDOT's initial coordination efforts in 2003. In October 2010, NPS notified MHT of their intent to utilize the NEPA EA process to help satisfy NHPA Section 106 responsibilities for the proposed relocation of the shared-use path onto NPS property (see attached). In January 2013, NPS forwarded a copy of the EA/AOE to MHT for review and comment. Based on their review of the document, MHT sent their concurrence to NPS on February 4, 2013 stating that the "Maryland Historic Trust has determined that this undertaking will have no adverse effect on historic properties" (see attached).

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: Initial coordination between MCDOT and the DNR and the USFWS indicated there were no federally listed or proposed threatened or endangered species within the overall project site. However, NPS staff had identified a small population of the state-listed threatened plant species *Melica mutica* (narrow melicgrass) near the southwest corner of the bridge outside of the proposed limits of disturbance (LOD) of the preferred alternative. Follow-up correspondence with both DNR and USFWS was initiated by NPS in September 2010 to verify the occurrence and confirmation was received in December 2012 from DNR Wildlife and Heritage Service (see attached). Since the plants are located outside of the LOD, there will be no impacts as they will not be disturbed, nor will their habitat experience any changes that will affect their ability to survive. However, as a precaution, the plants will be protected by fencing for the duration of construction.

Whether the action threatens a violation of federal, state, or local environmental protection law: No federal, state, or local environmental protection laws will be violated.

PUBLIC INVOLVEMENT

The EA/AOE was made available for public review and comment from January 9, 2013, through midnight on February 8, 2013. The EA/AOE and all relevant documents were announced on the NPS's Planning, Environment & Public Comment webpage. Comments were received from coordinating agencies, including SHPO, USACE, MDE, and USFWS. Relevant agency correspondence is attached.

A public meeting was held at GEP in the Spanish Ballroom on January 24, 2013 to solicit public input on the selected alternative. Attendees were able to ask questions and obtain additional information regarding the project, as well as provide written comments. A total of nine public correspondences were received during the public review period. Three respondents expressed explicit support for the selected alternative and three explicitly did not support the alternative. The remaining comments were either not explicit in recommendation of an alternative, and/or simply offered design recommendations. Comment responses are attached herein as Appendix C.

Of those who did not support the selected alternative, one respondent wanted the ROW to be preserved for potential extension of the DC streetcar service into Maryland. Another respondent did not like the idea of his tax dollars going to "a project that serves ONLY the biking interests of Montgomery County". The third respondent felt that even though the project purpose was important to Montgomery County, it did not fit the mission of NPS at GEP and CBNHS.

Other comments included a request for ongoing coordination with GEPPAC and a request for confirmation that the bus stop on MacArthur Boulevard, which is outside the project area, would remain in its current location. No changes were made to the selected alternative for implementation or the EA/AOE as a result of the comments received.

CONCLUSION

The NPS has selected Alternative 2, or the Preferred Alternative, for implementation. We conclude the implementation of the selected alternative will not have a significant effect on the human environment nor will it impair park resources and values (see attached). This conclusion is based on the impacts described in the 2012 *MacArthur Boulevard Shared-Use Path at Glen Echo Park EA/AOE*; and is developed through compliance with the NHPA Section 106 process, NPS and DOI laws, regulations and guidance; and in consideration of agency comments and consultation with USACE, USFWS, MDE, DNR, and SHPO. Adverse environmental impacts that will occur are negligible to minor in intensity. The proposed action will not cause highly uncertain or controversial impacts, unique or unknown risks, or significant cumulative effects. Implementation of the selected alternative will not violate any federal, state, or local environmental protection law.

The selected alternative does not constitute a major federal action that significantly affects the quality of the human environment. Based on the foregoing, an EIS is not required for this action, and thus will not be prepared. This is a finding of no significant impact.

Recommended:



Alexcy Romero
Superintendent
George Washington Memorial Parkway



Date

Approved:



Stephen Whitesell
Regional Director
National Capital Region



Date

APPENDIX A-

NON-IMPAIRMENT DETERMINATION

The NPS has determined that the implementation of the NPS selected alternative *will not* constitute impairment to the resources or values of *Glen Echo Park* or the *Clara Barton National Historic Site*. This conclusion is based on consideration of the thorough analysis of the environmental impacts described in the EA/AOE, relevant scientific studies, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction in *NPS Management Policies 2006*. As described in the EA/AOE, implementation of the NPS selected alternative *will not* result in impairment of park resources or values 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 in the park's management plan or other relevant NPS planning documents as being of significance.

PURPOSE AND SIGNIFICANCE OF GLEN ECHO PARK AND CLARA BARTON NATIONAL HISTORIC SITE

The National Chautauqua of Glen Echo was established on the grounds of what is now GEP in 1891 as a center for education, entertainment and cultural development. For a variety of reasons, the Assembly did not last long and in 1899 it was converted to a local amusement park. GEP operated between 1899 and 1968 with many of its visitors arriving via the trolleys of the Washington Railway and Electric Company. After the park closed in 1968, the local community organized in response to plans to redevelop the site as a residential community and worked with the Department of the Interior and the National Capital Planning Commission (NCPC) to protect the park. It was acquired by the General Services Administration (GSA) in 1970. The rationale for federal government acquisition of the GEP site was established in the park's purpose statement: "to protect the land and scenery adjacent to the Potomac River Palisades, to preserve the natural and cultural resources within the park and provide for public enjoyment and appreciation of these resources".

Based on a series of community forums, it was decided that the amusement park buildings would be adapted and re-used for community arts and education programs. In 1976, the park became part of the National Park System as a component of the George Washington Memorial Parkway (NPS 2001). It is the only example of an amusement park protected within the National Park system.

Today, the NPS is responsible for the overall management of GEP and the protection and interpretation of its natural and cultural resources. Montgomery County, through the non-profit GEPPAC, manages the arts and dance programs, produces festivals and special events, and assists with the management and maintenance of park facilities. The park was entered into the National Register of Historic Places (NHRP) in 1984 based on its significance as 1) a site of the late 19th century Chautauqua Movement; 2) a rare surviving regional example of an early 20th century amusement park of architectural significance; and 3) as a recreational facility for area residents and visitors.

The Clara Barton NHS commemorates the life of Clara Barton, founder of the American Red Cross. The house in Glen Echo was constructed in 1891 and initially served as a warehouse for disaster relief supplies. Beginning in 1897, it also served as Barton's home and the headquarters for the American Red Cross. From Glen Echo, she organized and directed American Red Cross relief efforts for victims of natural disasters and war until she resigned as president in 1904. Barton lived in the house until her death in 1912. The Clara Barton House was made a National Historic Landmark in 1966 and the CBNHS was established by the National Park Service in 1975.

Topography: The project area generally slopes from east to west. However, there are steep slopes between 15 and 25 percent along both sides of Minnehaha Branch, with the bottom of the channel approximately 35 feet below the bottom of the trolley bridge. Under the selected alternative, fill will be used to adjust the grade at Oxford Road and between the bridge and the parking lot along MacArthur Boulevard in order to achieve a maximum five percent grade, as required by the Americans with Disabilities Act of 1990 (ADA). This will result in permanent, minor adverse impacts to topography as the grade changes will be detectable but within a small, localized area. Topography is an important park resource as it contributes to the cultural landscape;

however, minor changes would not prevent the park from fulfilling its purpose. There will be no unacceptable impacts to the local topography; therefore this resource will not be impaired.

Hydrology and Water Quality: The study area is bisected by a segment of Minnehaha Branch, a tributary of the Potomac River. It is a perennial stream that originates outside the project study area and conveys flow southwest through a culvert beneath MacArthur Boulevard. Under the Preferred Alternative, there will be long term, minor adverse impacts to hydrology and water quality as a result of increases in impervious surface and short term minor adverse impacts due to construction activities, particularly the temporary diversion of the stream. As with topography, these resources contribute to the natural and cultural landscape of the park, but minor impacts will not prevent the park from fulfilling its purpose. There will be no impairment of these resources as impacts will be localized and will be mitigated by the use of appropriate cleaning containment systems and erosion and sediment control measures.

Wetlands: Minnehaha Branch is considered a Riverine Upper Perennial wetland for purposes of this EA. It is an important part of the natural landscape and contributes to the cultural landscape as well. Under the selected alternative there will be short term minor impacts to the wetland as a result of the temporary diversion of the stream within the existing channel. These temporary impacts will not impair the resource due to their short duration and the use of MDE guidelines to construct and maintain the diversion.

Vegetation: There are a variety of trees and shrubs located within the project area and the vegetation is an important part of the natural and cultural landscape. Most of the trees along the trolley ROW have been topped (i.e. the canopies have been severely pruned) to accommodate existing power lines. Many are being engulfed by invasive vines such as English ivy and oriental bittersweet. Under the selected alternative, there will be long term minor adverse impacts to vegetation. However, these impacts will not prevent the park from fulfilling its purpose. Impacts will not constitute impairment as the majority of the trees in the area will remain. In addition, native trees and shrubs will be replanted along the shared-use path as part of the project.

Wildlife: A variety of common wildlife can be found within the project area, which contributes to the natural landscape. Under the selected alternative, there will be long term minor impacts to terrestrial wildlife due to the clearing of some of the trees within the project area and temporary minor impacts to aquatic wildlife due to the temporary diversion in Minnehaha Branch; however, this will not prevent the park from fulfilling its purpose. Impacts will not constitute impairment to the resource because trees will only be removed along the ROW and the stream diversion will be temporary.

Scenic Resources: Scenic resources include the natural landscape along MacArthur Boulevard, as well as the Clara Barton NHS and GEP. Under the selected alternative, there will be long term minor adverse impacts to scenic resources as a result of the removal of some of the trees along the shared use path. These impacts will be associated with the change in view from the road and the Clara Barton House, but will not affect the ability of the park to fulfill its purpose. Impacts will not constitute impairment because changes will be minor.

Archeological Resources: The results of the Phase 1 Archeological Study indicated that the area had been disturbed to construct the trolley rail bed and it is unlikely that any significant resources would be encountered under the selected alternative; therefore, there will be no impairment to those resources.

Historic Structures and Districts: The Glen Echo Historic District and the Clara Barton NHS are both listed in the NRHP. The Cabin John/Brookmont Trolley ROW and bridge over Minnehaha Branch are identified in the Maryland Inventory of Historic Places and as a contributing element to the GEP Cultural Landscape. The selected alternative will have a minor, long term adverse impact on the trolley bridge due to the addition of hand railings. Proposed alterations to the bridge may have a minor adverse visual impact on the GEP Historic District and the Clara Barton House. Impacts will not constitute impairment as their integrity will not be compromised.

Cultural Landscapes: NPS recently conducted an inventory of the GEP – Clara Barton House Cultural Landscape. The period of significance for the landscape is 1888-1968, which incorporates the property uses of the National Chautauqua of Glen Echo, Clara Barton House, and GEP. There will be minor adverse impacts to the cultural landscape due to the construction of the asphalt path, the introduction of hand rails on the trolley

bridge, and the removal of 53 trees. There will also be moderate beneficial impacts to the cultural landscape as the trolley bridge will be rehabilitated and an historic transportation route will be re-used. There will be no impairment to the resource.

Transportation: Transportation resources include the adjacent roadways, the existing bike path, and the parking areas within the park. There will be negligible adverse impacts to the transportation network under the selected alternative as a result of the loss of parking spaces. Cumulative impacts will be beneficial with the addition of proper markings and signage to the trail section that traverses the upper parking lot. There will be no impairment associated with transportation impacts because other than during special events, there is sufficient parking at the park.

APPENDIX B- NPS Response to Comments

Commenter	Organization	Comment	NPS Response
Choppin, Timothy	N/A	I fully support the proposed project over the no-action alternative.	Comment noted
Choppin, Timothy	N/A	The proposed route makes good use of the historic and natural resources at the site, including the abandoned, but historically significant, trolley bridge.	Comment noted
Dawe, Stephen	N/A	I support the proposed one action alternative to re-align the shared use path as the no action alternative would continue a dangerous existing situation.	Comment noted
N/A, N/A	N/A	For years it has been evident that casual bikers use the MacArthur Blvd. bike path and bike groups and others who are attired as serious bikers do not, almost without exception. Tax dollars are precious and hopefully the above will be kept in mind.	The creation of a separate, multi-use path removed from the shoulder is needed to further enhance safety of all through this section of the MacArthur Boulevard Shared Use Path. Recreational cyclists and pedestrians on through-use or Park visitation would utilize the new path extensively, as it will allow them to bypass the intersection of MacArthur Boulevard and Goldsboro Road. High-speed cyclists conditioned to shoulder riding will want to, and the bus stop users will need to, remain on the shoulder.
Dyer, Robert	N/A	I strongly object to the proposed bike trail along part of the historic Glen Echo streetcar right-of-way (ROW). The most fundamental problem with this proposal is the unnecessary relocation of bike facilities onto the streetcar ROW.	Thank you for your comment; your follow-up concerns are addressed elsewhere in this document.
Dyer, Robert	N/A	I strongly urge you to scrap plans to utilize any portion of the streetcar right-of-way and creek trestle for bicycling or other vehicular or recreational use. Limited resources at this time would be better spent cooperating with the DC DOT on a potential extension of DC Streetcar service into Maryland, via the former Glen Echo right-of-way.	The NPS understands your concern that the use of the inactive ROW as a shared-use path replaces the original intended use as a trolley ROW. However, at this time there are no known existing or future plans to develop the inactive ROW for trolley use. The current DCDOT plans extend only as far as Georgetown. In addition, the ROW is no longer complete; many portions of this ROW, especially in the District, have already been abandoned and developed privately. This project preserves the ROW near Glen Echo as a travel corridor while not necessarily precluding transit use in the future.
Hoye, Richard	N/A	I support the realigned path using existing trolley alignments with the following comments and qualifications	Thank you for your comment; your recommendations are addressed elsewhere in this document

Commenter	Organization	Comment	NPS Response
Long, Nancy	N/A	I do not believe that those purposes, while important to Montgomery County transportation planning, are part of the mission of NPS at Glen Echo Park and Clara Barton National Historic Site.	As part of its mission, the NPS "...cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation...." This development project would create appreciation for the Park by introducing some users that may have been thus far relegated to the roadway.
Long, Nancy	N/A	As the programmatic expansion plans of the Glen Echo Park Partnership for Arts and Culture begin to take effect, there will be increasing visitation for Glen Echo Park, which, in turn, will result in the need for more parking spaces. The only land area where parking space can be increased is the very space the path would occupy; granting the special use permit is tantamount to giving this land away in perpetuity because the path will become a permanent feature as part of the CBNHS and GEP. Parking cars in surrounding neighborhoods and along MacArthur Boulevard and Goldsboro Road must not be considered as an option for overflow park traffic.	The implementation of the preferred alternative will impact six to eight parking spaces in the small lot along MacArthur Boulevard on land administered by the Army Corps of Engineers and permitted to NPS. There may be opportunity to replace those spaces with currently cordoned-off spots near the original entrance to the park. In addition, under normal circumstances there is ample parking in the Main Visitors Lot. Concerns related to overflow parking during Glen Echo Park Partnership for Arts and Culture (GEPPAC) events are noted; however, the shared-use path will have little or no impact as its proposed location is currently not used for special event parking. Also, the addition of a safe, shared-use path into the Park is envisioned to bring more users via alternative forms of transportation. Finally, for the portion on NPS property, the completed path would be turned over by Montgomery County to NPS for management; NPS would not be giving away interest in the land.
Long, Nancy	N/A	The entire creek atmosphere would be drastically changed by the introduction of the shared-use path. The creek and its environs are definitely a pleasurable part of the visitor experience to Glen Echo Park. The destruction of many trees in this space would be a disaster. This plan serves only to degrade the visitor experience; it adds no positive element, only negative elements.	To provide for an unobstructed path, the trees to be removed are not in the creek valley but rather along the trolley ROW between Oxford Road and to about 50 feet from the north end of the trestle bridge; a few trees will also need to be removed near the upper parking lot. Hence, the creek environs will still be very well forested though there will be a minor adverse impact to vegetation of the project area as a whole with the loss in vegetation cover. The NPS has agreed to mitigation for all of the lost trees that will add to tree cover elsewhere in the GWMP. The addition of the restored bridge element to the visitor experience is seen as a positive and as an interpretive opportunity for the creek and historic trolley.

Commenter	Organization	Comment	NPS Response
Long, Nancy	N/A	There would be a conflict among auto traffic (at entry/departure points), bicyclists, runners, walkers some of these with strollers, some in concentration with their electronics, somehow presuming they will be safe. Another foreseeable danger is the use of the 8 foot-wide asphalt "path" as a road, particularly from Oxford Road,	These conflicts currently exist at the shoulder crossing at Oxford Road. With the construction of the new shared-use path, improved pavement markings and signage will improve the safety at Oxford Road. In addition, the preferred alternative will eliminate the crossing at the entrance to the upper parking lot. The new parking lot crossing here should be safer than the shoulder-entrance crossing given safety treatments (signage, pavement markings, raised path) leading to improvements like better visibility and slower speed of traffic. With the appropriate signage and pavement markings at all new crossing locations, it is unlikely that the entrance to the trail would be mistaken as a road.
Long, Nancy	N/A	Maintenance of the path would become the responsibility of NPS, a duty that should not be theirs. NPS is woefully lacking in funds and personnel to take care of the grounds and facilities	The NPS stands to benefit overall through the addition of an enhanced and safer alternative transportation mode connection, rehabilitation of a historic bridge, and a three-year period from the time of construction completion that the County is responsible for treating and monitoring exotic plant populations in the project area. The NPS sees the project as a net benefit and understands and accepts the responsibility of long-term maintenance of the trail and bridge.
Boerner, Katey	Glen Echo Park Partnership for Arts and Culture	Routing the path across the upper parking lot will require the elimination of six to eight parking spaces in a lot that is heavily used by staff, cooperators, and the public. GEPPAC suggests that these spaces be replaced by allowing parking in the currently-striped area directly opposite the large neon Glen Echo Park entrance sign, centered on the Pepco pole in the road.	The implementation of the preferred alternative will impact six to eight parking spaces in the small lot along MacArthur Boulevard on land administered by the Army Corps of Engineers and permitted to NPS. There may be opportunity to replace those spaces with currently cordoned-off spots near the original entrance to the park. In addition, under normal circumstances there is ample parking in the Main Visitors Lot. Concerns related to overflow parking during Glen Echo Park Partnership for Arts and Culture (GEPPAC) events are noted; however, the shared-use path will have little or no impact as its proposed location is currently not used for special event parking. Also, the addition of a safe, shared-use path into the Park is envisioned to bring more users via alternative forms of transportation.
Boerner, Katey	Glen Echo Park Partnership for Arts and Culture	At what point in the project, and for how long, would access to the parking lot be restricted during path construction?	The bike path crossing of the parking lot could be done in two phases and only part of the parking lot would be closed at a time. The construction time would likely not be

Commenter	Organization	Comment	NPS Response
			much longer than having the lot resurfaced and restriped. The affected lot users will be notified in advance and given a firmer estimate at that time. The main parking lot off of Oxford Road would be an available alternative during any periods of closure of the upper parking lot.
Boerner, Katey	Glen Echo Park Partnership for Arts and Culture	Work on rehabilitation of the trestle and construction of the pathway across it may require closing the trail that provides access to Minnehaha Branch. This could negatively impact the activities of Living Classrooms, one of the resident park programs. GEPPAC requests that the contractors coordinate any trail closures with our program activities and keep the time the trail is closed as short as possible.	The spur trail running down the slope on the south side of the trolley bridge may require closing during some of the time that the trolley bridge is being rehabilitated. The contractor will coordinate any possible closures with the NPS and a stipulation noted to keep the trail closure as short as possible. The existing developed path from the main parking lot to Glen Echo Park will not be impacted during the construction of the bike path or the rehabilitation of the trolley bridge.
N/A, N/A	N/A	lighting on trolley bridge at GEP -	Lighting for the trail is not part of the current plans; however, NPS may consider it in the future. Study would need to be done to determine the need, feasibility, and the appropriateness of lighting for the affected cultural and natural landscapes.
N/A, N/A	N/A	[There should be a] sign to dismount bicycles at one lane bridge to Cabin John	The one lane bridge to Cabin John on MacArthur Boulevard is not within the NPS project scope since it is not on NPS property; however, it is part of the larger Montgomery County MacArthur Boulevard Bikeway project. Your suggestion will be forwarded to the County for consideration.
N/A, N/A	N/A	Need for keeping Ride On bus stop at Park on River side of MacArthur Blvd.	There are no plans that the NPS knows of to change the location of the existing bus stop on MacArthur Boulevard. Safety of the stop in its current location should increase with the completion of the preferred alternative by moving some through-trail users off of the road shoulder, leaving more room for bus users.
Reeder, Jack	N/A	I have severe reservations to this plan and am opposed to in it principle and practice. The existing bike path is under utilized as is.	The development of the safer and more interesting path is designed to promote more casual users to recreate here and travel by non-automotive means.
Reeder, Jack	N/A	Why spend my tax dollars for a project that serves ONLY the biking interests of Montgomery County and worsens the safety of the Town's citizens and other commuters?	This plan will create a safer and more enjoyable recreational and commuting experience for all users of the shared-use path and MacArthur Boulevard by offering recreational trail users an attractive alternative to the intersection at Goldsboro Road.

Commenter	Organization	Comment	NPS Response
Reeder, Jack	N/A	the project does nothing to fix the issues I have with bikers anyway:	Comment noted The NPS appreciates that you have concerns and feels that the selected alternative best meets the purpose and need of the project in a manner that benefits multiple user groups.
Reeder, Jack	N/A	I vote for the "Do Nothing" option.	Comment noted The NPS appreciates that you have concerns, feels that the selected alternative best meets the purpose, and need of the project.
Hoye, Richard	N/A	The project alternatives completely fail to integrate the Glen Echo Historical Park facilities into the project design. Pedestrians and bicyclists using the shared use path as planned on the trolley alignment and restored trolley bridge are not given a car-free connection into the Glen Echo Park. The realignment directs bicyclists and pedestrians who are using the multiuse trail to divert from the car-free path as it crosses a parking lot (back up to the existing route) and then to use the driveway in order to enter the Park facilities at the restored historic trolley stop.	As noted in the EA "Alternative" section, several alternatives that would have brought the path closer to the entrance were examined; however, these alternatives were not feasible for a variety of reasons. While the solution of the preferred alternative does not create an exclusive non-automotive access to the Park, it improves access over the current configuration by allowing departures from the shared-use path to the Park entrance in the slow-speed parking lot, rather than creating traffic confusion at the current parking lot entrance.
Hoye, Richard	N/A	This bus stop is not integrated into the project design despite the proximity of the bus stop to the proposed facility (about 20 feet away) and the fact that buses are intermodal conveyors of bicyclists as the bus system is universally equipped with bike racks.	The bus stop will remain alongside the existing shoulder. While not specifically integrated into the new design, by remaining where it is, the bus stop has been accounted for and its users considered as integral in the safe separation of user groups. It is unclear how the stop could be brought closer to the new path alignment without considerable engineering and resource impact. While improvements to transit access would be beneficial, they are also not specific to the project's purpose and need and therefore not required for consideration.
Hoye, Richard	N/A	The project relies on restoring an historically and culturally significant section of Trolley right of way and a trolley bridge yet does not provide direct access for Park users from either the Park's other restored facilities or from the public parking area.	The shared use path will be directly accessible via the parking lot on MacArthur Boulevard and at Oxford Road at the grass lawn area, which is currently used for overflow parking; Park users would have full access at either of these termini of the 800 foot-long section of shared-use path.
Hoye, Richard	N/A	The rerouted trail is directed across an existing service parking area exposing trail users and drivers to an unnecessary conflict risk.	The parking lot crossing will be a new feature, but it can be made safe. Signage, pavement markings, and a raised trail will provide visibility and slow traffic in the lot and have been recommended by the Federal Highway Administration.

Commenter	Organization	Comment	NPS Response
Hoye, Richard	N/A	The rerouted trail facility should be lit at night.	Lighting for the trail is not part of the current plans; however, NPS may consider it in the future. Study would need to be done to determine the need, feasibility, and the appropriateness of lighting for the affected cultural and natural landscapes.

APPENDIX C-
CORRESPONDENCE

201300060

F
NPS
ESJ/JES

RECEIVED
JAN 09 2013



United States Department of the Interior BY: _____

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

IN REPLY REFER TO:
L7600K (GWMP)

January 7, 2013

Mr. J. Rodney Little
State Historic Preservation Officer
Maryland Historic Trust
100 Community Place, Third Floor
Crownsville, MD 21032-2023

Attention: Elizabeth Cole and Jonathan Sager

Subject: MacArthur Boulevard Shared-Use Path at Glen Echo Park Environmental
Assessment/Assessment of Effect Availability

MO Co

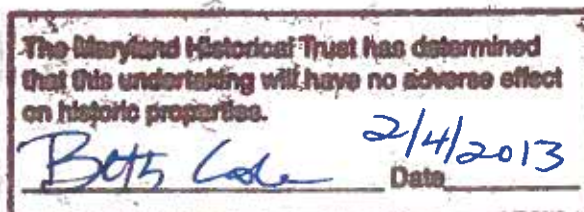
Dear Mr. Little:

In accordance with the Council of Environmental Quality, the National Environmental Policy Act, and the National Historic Preservation Act, George Washington Memorial Parkway, a unit of the National Park Service, is forwarding a copy of *MacArthur Boulevard Shared-Use Path at Glen Echo Park Assessment/Assessment of Effect (EA/AoE)* for your review. This document will be available for public and agency review January 9, 2013 through February 8, 2013.

The document has also been posted electronically on the National Park Service's web-based program "Planning, Environment, and Public Comment (PEPC)." The web address is <http://parkplanning.nps.gov/MacarthurBlvdBikewayImprovements>.

Comments can be submitted in PEPC or mailed to:

Acting Superintendent
700 George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101



MHS-41
2/4/2013
JES
1/15/13



Martin O'Malley, Governor
Anthony G. Brown, Lt. Governor
John R. Griffin, Secretary
Joseph P. Gill, Deputy Secretary

October 25, 2010

Ms. Dottie P. Marshall
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

RE: Environmental Review for Provision of Easement to Montgomery County Department of Transportation for Relocation/Construction of MacArthur Boulevard Shared-Use Path, Montgomery County, Maryland.

Dear Ms. Marshall:

Thank you for providing us with the information regarding an occurrence of Narrow Melicgrass (*Melica mutica*) on this project site. Other than this population, the Wildlife and Heritage Service is not aware of any State or Federal records for rare, threatened or endangered species within the boundaries of the project site as delineated. We are glad to see that the population of state-listed threatened plant will be conserved by protective fencing. The Wildlife and Heritage Service of DNR respectfully requests a copy of the site plan showing the precise location of the Melicgrass in relation to the proposed work. We would also recommend that activities that would introduce or further spread non-native invasive plants be avoided.

Thank you for allowing us the opportunity to review this project. If you should have any further questions regarding this information, please contact me at (410) 260-8573.

Sincerely,

Lori A. Byrne
Environmental Review Coordinator
Wildlife and Heritage Service
MD Dept. of Natural Resources

ER # 2010.1440.mo
Cc: D. Brinker, DNR

If any planned or ongoing activities cannot be conducted in compliance with the National Bald Eagle Management Guidelines (Eagle Management Guidelines), please contact the Chesapeake Bay Ecological Services Field Office at 410-573-4573 for technical assistance. The Eagle Management Guidelines can be found at:

<http://www.fws.gov/migratorybirds/issues/BaldEagle/NationalBaldEagleManagementGuidelines.pdf>.

In the future, if your project can not avoid disturbance to the bald eagle by complying with the Eagle Management Guidelines, you will be able to apply for a permit that authorizes the take of bald and golden eagles under the Bald and Golden Eagle Protection Act, generally where the take to be authorized is associated with otherwise lawful activities.

An additional concern of the Service is wetlands protection. Federal and state partners of the Chesapeake Bay Program have adopted an interim goal of no overall net loss of the Basin's remaining wetlands, and the long term goal of increasing the quality and quantity of the Basin's wetlands resource base. Because of this policy and the functions and values wetlands perform, the Service recommends avoiding wetland impacts. All wetlands within the project area should be identified, and if construction in wetlands is proposed, the U.S. Army Corps of Engineers, Baltimore District, should be contacted for permit requirements. They can be reached at (410) 962-3670.

We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interests in these resources. If you have any questions or need further assistance, please contact Trevor Clark at (410) 573-4527.

Sincerely,

A handwritten signature in blue ink that reads "G. LaRouche". The signature is written in a cursive, flowing style.

Genevieve LaRouche
Supervisor

the River mainstem in this vicinity, as well as post-spawn striped bass. Efforts have been ongoing to restore American shad spawning runs in this area (River mainstem), and their presence should also be expected. American eels, a catadromous fish species that lives and grows in freshwater streams before migrating to the ocean to spawn, are also found in this area, including tributaries. The Potomac River mainstem in this area supports smallmouth bass, largemouth bass, walleyes, various panfish, and potentially several other gamefish species. Other resident fish species are also found in the Potomac River and its tributaries in this area. Fish passage from the River mainstem into tributaries is a case by case situation in this area, based on the presence or absence of barriers created by natural rock falls and steep rapids, as well as man made culverts and other barriers, especially those associated with the C&O Canal.

All of the referenced fish are spring spawning species, and the instream restriction period referenced above is an important Best Management Practice (BMP), as well as State instream work permitting requirement, for protection of these species and their spawning activities. Other important BMPs would include stringent sediment and erosion control, use of temporary instream diversions to conduct all unavoidable instream construction in an isolated, de-watered setting, and isolation of any concrete or grout use to avoid pH spikes within natural streamflow. Projects conducted within tributaries in this vicinity should consider aquatic habitat impact minimization at the project site and also downstream. Based on the project description included in the information request letter, we understand that planning efforts have been made to avoid and minimize instream impacts, and to apply BMPs for the protection of aquatic habitat. We advocate and support these BMP efforts, and provided that the instream restriction period referenced above (expanded to the February 15 date for the potential presence of yellow perch downstream) is adhered to and other referenced BMPs are applied, impacts to fisheries resources in the area should be reasonably limited.

If you have further questions on the fisheries resources within the subject project area or any of the information above, please contact me at your convenience at 410-260-8331, or ggolden@dnr.state.md.us

Sincerely,



Greg Golden, Director
Environmental Review Unit