

APPENDICES

APPENDIX

A

DRAFT IMPAIRMENT DETERMINATION



DRAFT IMPAIRMENT DETERMINATION

DEFINITION OF IMPAIRMENT

According to NPS *Management Policies 2006*, Section 1.4.5, *What Constitutes Impairment of Park Resources and Values*, impairment is an impact that, in the professional judgment of the responsible National Park Service manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

An impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- Identified as a goal in the park's general management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

PARK RESOURCES AND VALUES

NPS *Management Policies 2006*, Section 1.4.6, *What Constitutes Park Resources and Values* identifies park resources and values that may be impaired. These resources include:

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

The NPS Organic Act of 1916 directs the U.S. Department of the Interior and the NPS to manage units in order “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (16 USC § 1). While some actions and activities proposed by the NPS cause adverse impacts on park resources and values, the NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values. The Organic Act prohibits actions that permanently impair park resources unless a law directly and specifically allows for the acts (16 USC 1a-1). An action constitutes an impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (NPS 2006). To determine impairment, the NPS must evaluate “the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (NPS 2006).

IMPAIRMENT DETERMINATION FOR THE PREFERRED ALTERNATIVE

The NPS has determined that the implementation of the NPS Preferred Alternative *will not* constitute an impairment to the resources or values of Fort Hunt Park or the George Washington Memorial Parkway. This conclusion is based on consideration of the thorough analysis of the environmental impacts described in the EA, 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, implementation of the NPS Preferred 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.

The Preferred Alternative would result in short-term to long-term negligible to moderate adverse impacts on some of the park's resources, which include Soils, Vegetation, Wildlife, Scenic Resources (Aesthetics and Viewsheds), and Cultural Resources (Archeology, Historic Structures and Districts, and Cultural Landscapes). An impairment determination is not made for Visitor Use and Experience, Human Health and Safety, or Park Operations and Management because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair park resources and values.

SOILS

Soils within the project area of the Preferred Alternative are generally in good condition. In some localized areas throughout the project site however, such as the ball field near Picnic Pavilion A, poor drainage has caused minor erosion and soil compaction to occur. In addition, soil compaction has occurred in a few areas due to suppressed vegetative growth caused by the continued use of social trails. The soil resources within Fort Hunt Park are necessary to fulfill the purpose of which the park was established; however, soils has not been identified as a significant resource in any Fort Hunt Park or GWMP planning documents.

Under the Preferred Alternative, soil disturbance due to grading activities during construction would result in short-term minor adverse impacts to soils. To mitigate these impacts, erosion and sediment (E&S) control measures and other best management practices (BMP's), such as soil stabilization techniques, would be implemented as needed to decrease soil erosion from construction activities. Construction access and staging would be designed to avoid or minimize impacts to undisturbed soils. In areas where structures would be removed, the area would be seeded to prevent post-construction soil erosion. Additionally, drainage issues identified throughout the project area would be improved and minor amounts of impervious surface would be removed resulting in long-term beneficial impacts to soils. Alternative C would have long-term minor adverse impacts to soils from soil loss and increase in imperviousness (3.5 acres) from new infrastructure. Alternative C would also result in beneficial impacts to soils because of removal of imperviousness (2.3 acres), the remediation of current drainage issues, and reduction of soil compaction due to social trailing. Because the Preferred Alternative would result in short-term minor adverse impacts to soils during construction, long-term minor adverse impacts from soil loss and increase in imperviousness, and would have long-term beneficial impacts due to the remediation of drainage issues and reduction of soil compaction, the Preferred Alternative would not result in impairment to the soil resources of Fort Hunt Park.

VEGETATION

Vegetative communities at Fort Hunt Park are a result of past and present land uses and topographic setting. The interior and northern portions of the park consist of lawns and shade trees that are maintained for the recreational use of the park. Areas in and surrounding the park are composed of mid-successional deciduous forest stands and early-

successional disturbed areas with an abundance of invasive herbaceous species where previously maintained areas have become overgrown with weeds and woody vines. The vegetation and land cover of Fort Hunt Park is necessary to fulfill the purpose for which the park was established and is key to the cultural landscape which defines the park and provides opportunities for visitor enjoyment.

Under the Preferred Alternative, construction activities would require land disturbance that would have impacts to vegetation. Realignment of the park entrance to its historic location, the proposed chronological interpretive trail, the construction of the bicycle/pedestrian trail adjacent to the northern portion of the loop road, and the construction of the visitor facility at the current site of Picnic Pavilion/Area C have the potential to cause minor impacts to trees throughout the project area. However, the design and alignment of these facilities would avoid impacts to vegetation to the extent possible. Additionally, BMPs including elements such as tree protection measures would be incorporated into the construction plans to minimize impacts to vegetation where avoidance measures are not feasible. The removal of parking areas D and E, along with the removal of the southern portion of the existing loop road, would provide additional area for grass seeding or revegetation with native species. Long-term minor adverse impacts to vegetation would occur due to the removal of vegetation to accommodate new structures. Because the Preferred Alternative would result in long-term minor adverse impacts due to the removal of individual trees, the Preferred Alternative would not result in impairment to vegetation at Fort Hunt Park.

WILDLIFE

Wildlife habitat within Fort Hunt Park is typically comprised of mid-successional forest and forest edges. These habitats are common throughout the region and include mostly deciduous trees and an array of birds, mammals, insects, etc. Forested wetlands are located in the southern portions of Fort Hunt Park. Additionally, knowledge of a bald eagle (*Haliaeetus leucocephalus*) nest on site is confirmed by GWMP natural resources managers. Wildlife and the habitat in which it resides is necessary to fulfill the purpose for which the park was established and is key to the natural landscape which defines the park and provides opportunities for visitor enjoyment.

Under the Preferred Alternative, small disturbances to wildlife during construction activities, including the removal of vegetation in localized areas of Fort Hunt Park would occur. Vegetation removal would be limited to the extent feasible. Construction managers would be informed of the presence of the bald eagle nearby and impacts to the bald eagle nesting site would be avoided. No construction is proposed within wetlands on site, or within a 100-foot buffer of wetlands, and no impacts to wetland habitat are anticipated. Due to the relatively small scale and short durations of construction activities under the Preferred Alternative, impacts would not be expected to be outside the natural range of variability of wildlife populations, habitats, or sustainability. As a result, the Preferred Alternative would result in short-term minor adverse impacts to wildlife due to construction activities. Additionally, proposed actions under the Preferred Alternative include removal of existing built facilities at Fort Hunt Park. In place of existing pavilions, parking lot area, and road area, the proposed actions would establish and maintain open spaces which are likely to attract birds and small mammals. The open spaces would be suitable for species which are well adapted to human presence. The attraction of wildlife to these newly created open space habitat areas would be noticeable, resulting in long-term beneficial impacts to wildlife. Also, under the Preferred Alternative, the existing roadway throughout the southern portion of the park would be closed to vehicles and maintained as a pedestrian/bike trail. Vehicle access would be limited to the northern portion of the park. As a result, fewer and less severe disturbances to native wildlife would occur in the existing roadway area. Therefore, long-term beneficial impacts to wildlife would result from Alternative C due to vehicle access restrictions. Because impacts to wildlife would consist of short-term minor adverse impacts due to construction activities, and long-term beneficial impacts due to the creation of open spaces and limited vehicle access, there would be no impairment to wildlife at Fort Hunt Park under the Preferred Alternative.

HISTORIC STRUCTURES AND DISTRICTS

Fort Hunt Park was listed as a historic district in the national register on March 26, 1980. The district is significant under Criterion A for its association with military history (NPS 1980). The park was originally a coastal artillery battery intended to defend Washington, DC from seaborne attack during the Spanish-American War. After its abandonment in 1923, the park was used for various military functions up until 1933 when the land was transferred to the NPS and was incorporated into the GWMP. Since becoming an NPS property, Fort Hunt has served various functions including a camp for Civilian Conservation Corp (CCC) from 1933 through 1942, and a top-secret military intelligence center from 1942 through 1946. In the 1960s, the NPS developed the park for recreational and public use by installing picnic pavilions, comfort stations, interpretive waysides, and three softball diamonds and opened the park to the public in 1964. Contributing resources of the historic district include the batteries, the Battery Commander's Station, the NCO Quarters, Fort Hunt Overpass, a Brick Storage Building, and Wharf pilings. Each of these resources is necessary to fulfill the purposes of Fort Hunt Park as a significant historic resource and is key to the cultural integrity of the park and the opportunity for visitor enjoyment. These resources have been preserved and carefully maintained in accordance with numerous planning documents.

Under the Preferred Alternative, the Visitor Facility would be located at Picnic Pavilion C. The location of the new Visitor Facility would minimize disturbance to natural and archeological resources while also avoiding the placement of a new structure near existing historic structures at Fort Hunt Park. The Visitor Facility at Picnic Pavilion C is far removed from other historic structures and not visible from the NCO Quarters and batteries. From the Battery Commander's Station, the Visitor Facility would only partially be visible and views would be filtered by existing vegetation. When compared to Alternatives B and D, the Visitor Facility would be surrounded by mature forest providing a visual buffer from other historic structures such as the Battery Mount Vernon, CCC era Oil Storage House, and Battery Commander's Station. As a result of avoidance and minimization, the new visitor facility would have negligible adverse impacts on historic structures and districts because of the construction of a new facility at Fort Hunt Park (a historic site).

Under the Preferred Alternative, the NCO Quarters would undergo an undetermined future preservation treatment following the *Secretary of the Interior's Guidelines for the Treatment of Historic Properties*. The NCO Quarters is a contributing resource to the cultural landscape as well as the historic district. The proposed action would reduce the structure's deterioration and retain it for future park visitors. The Spanish-American War era batteries, NCO Quarters, and Battery Commander's Station would continue to be maintained by the park, although preservation work is not planned at this time. Further study would be conducted to determine the appropriate level of visitor access given to these historic features. These structures are contributing features to the historic district.

The enhanced interpretation planned for the site would potentially bring more visitors to the park, exposing the historic resources to additional wear and tear caused by visitors climbing and/or treading on sites, particularly the batteries. Although treatment of the batteries is not specifically identified as an action in this SDP, NPS practice is to maintain and preserve cultural resources. Therefore, NPS would protect these existing contributing resources as needed in the future to avoid diminishing the character-defining features and integrity of the resource to a level that would constitute more than a long-term minor adverse impact.

Because the combined impacts of all categories under the Preferred Alternative would have local direct and indirect long-term negligible adverse impacts and would not significantly diminish the overall integrity of the historic resources at Fort Hunt Park, it is anticipated that the Preferred Alternative would not have an impairment on the historic structures and districts at Fort Hunt Park.

CULTURAL LANDSCAPES

According to a Cultural Landscape Inventory (CLI) completed by the NPS for Fort Hunt Park in 2001 (NPS 2001, revised 2004), various features including structures such as the Batteries and the Battery Commander's Station, circulation features such roads and trails, land use activities like picnicking, small-scale features like boundary markers and stone fireplaces, vegetation, and views and vistas collectively contribute to the significance of Fort Hunt Park as a cultural landscape. Each of the identified resources is necessary to fulfill the purposes of Fort Hunt Park as a significant cultural and historic landscape and is key to the cultural integrity of the park and visitor enjoyment. These resources have been preserved and carefully maintained in accordance with numerous planning documents.

All work proposed under the Preferred Alternative would be completed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* in order to avoid and/or minimize any adverse impacts. Under the Preferred Alternative, the entrance road to Fort Hunt Park would be realigned to follow the historic military alignment. Additionally, the lower portion of the main park loop road between existing Picnic Pavilion D and Picnic Area E would be removed. The paved loop road around Picnic Area E would be converted to a pedestrian/bike path, which would enhance recreation opportunities and would maintain an historic land use for Fort Hunt Park. The Preferred Alternative would have a beneficial impact in providing visitors continued access to the site. Additionally, a visitor facility is proposed at the current site of Picnic Pavilion C, which would be removed during construction. The proposed visitor facility would be located within the existing woodlands, which is a contributing landscape feature to Fort Hunt Park. Construction of the visitor facility would avoid damage to the existing trees and would retain the woodland's sense of density without significantly diminishing the integrity of the resource. The proposed visitor facility has the potential to alter and obstruct views to the woodland border around the perimeter of the park, but these impacts would be localized and the effect on the views and the woodland would be limited, and would not diminish the overall integrity of the cultural landscape.

Also under the Preferred Alternative, the removal and seeding of the Picnic Areas B and D would reestablish open space within the cultural landscape. A bicycle/pedestrian trail would be constructed that would continue as a separate recreational trail around the northern portion of the park. The insertion of a northern pedestrian/bicycle trail would not alter the character-defining features or significantly diminish the overall integrity of the cultural landscape. The roadway along the southern loop road would be reduced by 50 percent, and the areas where asphalt is removed would be reestablished with native vegetation. Reducing the amount of pavement within throughout the southern portion of the loop road would enhance the overall integrity of the woodlands, a contributing feature of the cultural landscape.

Because the proposed actions under the Preferred Alternative would have local direct and indirect long-term minor adverse impacts and would not significantly diminish the spatial organization, circulation patterns, or other aspects of the cultural landscape, it is not anticipated that the Preferred Alternative would cause impairment to the cultural landscape of Fort Hunt Park.

ARCHEOLOGICAL RESOURCES

Few archaeological investigations have been conducted within Fort Hunt Park. There have been no archaeological sites registered with the Virginia Department of Historic Resources within Fort Hunt Park as of April 2011. Fort Hunt Park is associated with a rich military history that began in the last quarter of the nineteenth century. The fort was initially part of the coastal defense system of Washington, DC, was later used as a training facility for African-American ROTC units, and after disposal of the property by the War Department, became part of the national park system. During the Great Depression, a CCC camp was present within the park and many park amenities were constructed during that period. However, it was during World War II that Fort Hunt was used as a top-secret military intelligence center (known as P.O. Box 1142) that included an interrogation center for German POWs. By

1948 the military facilities associated with the World War II facility had been dismantled and the park was transferred back to the NPS. A recent investigation has revealed that many of the World War II facilities are represented within Fort Hunt Park as foundations.

Under the Preferred Alternative, the removal of structures such as picnic pavilions, parking areas, roadway, and ball fields could result in minor to moderate impacts to archeological features at Fort Hunt Park. Additionally, construction of the proposed visitor facility and associated infrastructure, such as an access road, water, sewer, and electricity would be associated with an increased level of ground disturbance. Impacts of construction on archeological resources could range from minor to moderate depending on the nature of the potential archeological resources. Most areas of ground disturbance associated with the Preferred Alternative have not been surveyed for the presence of archeological resources, and additional survey is needed. Prior to construction, the NPS would conduct an archeological survey to identify and evaluate for listing in the NRHP archaeological resources within the construction limit of disturbance. If found eligible, the NPS would take measures to avoid, minimize, or mitigate the impact of construction upon the archeological resources.

Because impacts to archeological sites would be avoided, minimized, or mitigated, the implementation of the actions under the Preferred Alternative has the potential to result in minor to moderate long-term adverse impacts to archeological resources.

APPENDIX

B

AGENCY CONSULTATION LETTERS





Preserving America's Heritage

D18

February 25, 2011

Jon G. James
Deputy Superintendent
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

**Ref: *Site Development Plan, Fort Hunt Park
Fairfax County, Virginia***

Dear Mr. James:

On January 12, 2011, the Advisory Council on Historic Preservation (ACHP) received the National Park Service's (NPS) notification pursuant to Section 800.8(c) of the ACHP's regulations, "Protection of Historic Properties" (36 CFR Part 800). We appreciate receiving your notification, which establishes that NPS will use the process and documentation required for the preparation of an EA/FONSI to comply with Section 106 of the National Historic Preservation Act in lieu of the procedures set forth in 36 CFR 800.3 through 800.6.

In addition to notification to the ACHP, NPS must also notify the Virginia State Historic Preservation Officer (SHPO) and meet the standards in Section 800.8(c)(1)(i) through (v) for the following:

- identify consulting parties either pursuant to 800.3(f) or through the NEPA scoping process with results consistent with § 800.3(f);
- identify historic properties and assess the effects of the undertaking on such properties in a manner consistent with the standards and criteria of § 800.4 through 800.5;
- consult regarding the effects of the undertaking on the qualifying characteristics of historic properties with the SHPO/THPO, Indian tribes, other consulting parties and the Council;
- involve the public; and
- develop in consultation with identified consulting parties alternatives and proposed measures that might avoid, minimize or mitigate any adverse effects of the undertaking on historic properties and describe them in the EA.

To meet the requirement to consult with the ACHP as appropriate, the NPS should notify the ACHP in the event NPS determines, in consultation with the SHPO, Indian tribes, and other consulting parties, that

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

the proposed undertaking may adversely affect properties listed, or eligible for listing, on the National Register of Historic Places (historic properties).

The regulations do not specifically require that an agency submit an EA to the ACHP. However, keep in mind that, in the case of an objection from the ACHP or another consulting party, Sections 800.8(c)(2)(ii) and (c)(3) provide for ACHP review of an EA to determine whether preparation of the EA has met the standards set forth in Section 800.8(c)(1) and/or to evaluate whether the substantive resolution of the effects on historic properties proposed in an EA is adequate.

If NPS' determination of adverse effect will be documented in an EA, we request that you notify us of the adverse effect and provide adequate documentation for its review. The ACHP's decision to review an EA, will be based on the applicability of the criteria in Appendix A of the ACHP's regulations.

Thank you for your notification pursuant to Section 800.8(c). If you have any questions or if we may be of assistance, please contact Katry Harris at 202-606-8520, or via e-mail at kharris@achp.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Caroline D. Hall', written in a cursive style.

Caroline D. Hall
Assistant Director
Office of Federal Agency Programs
Federal Property Management Section



Official Species-list: *Fort Hunt Park Site Development Plan*

Following is an official U.S. Fish and Wildlife Service species-list identifying listed and proposed species and designated and proposed critical habitat that may be affected by the project "Fort Hunt Park Site Development Plan". You may use this list to meet the requirements of section 7(c) of the Endangered Species Act of 1973, as amended (ESA). This species-list has been generated by the Service's on-line Information, Planning, and Conservation (IPaC) decision support system based on project type and location information you provided on February 8, 2011, 10:55 AM. This information is summarized below.

Please reference our tracking number, 51411-2011-SLI-0230, in future reference to this project to assist in expediting the process.

Newer information based on updated surveys, changes in the abundance and distribution of listed species, changed habitat conditions, or other factors could change this list. Please feel free to contact the office(s) identified below if you need more current information or assistance regarding the potential presence of federally proposed, listed, or candidate species, or proposed or designated critical habitat. Please note that under the ESA, a species-list is valid for 90 days. Therefore, the Service recommends that you visit the IPaC site at regular intervals during project planning and implementation for updates to species-lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive this list. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

This list below only addresses federally proposed, listed, or candidate species and federally designated critical habitat. Please contact the appropriate State agencies for information regarding State species of special designation. Also, please feel free to contact the office(s) identified below if you would like information on other important trust resources (such as migratory birds) in your project area.



United States Department of Interior
Fish and Wildlife Service

Project name: Fort Hunt Park Site Development Plan

Primary contact U.S. Fish and Wildlife Service office:

VIRGINIA ECOLOGICAL SERVICES FIELD OFFICE
6669 SHORT LANE
GLOUCESTER, VA 23061
(804) 693-6694
<http://www.fws.gov/northeast/virginiafield/>

Non-contributing U.S. Fish and Wildlife Service office(s):

The following office(s) also have jurisdictions that overlap your project area, but they did not contribute to this document. Please consult with them for additions to this species-list. Do this by visiting their website, if it is provided below. If a website is not provided, contact the office(s) by mail or phone.

CHESAPEAKE BAY ECOLOGICAL SERVICES FIELD OFFICE
177 ADMIRAL COCHRANE DRIVE
ANNAPOLIS, MD 21401
(410) 573-4500

TAILS consultation code: 51411-2011-SLI-0230

Project type: Land - Management Plans



Project location map:



Project coordinates: MULTIPOLYGON (((-77.04572 38.71582, -77.04451 38.71144, -77.05704 38.70723, -77.05893 38.70989, -77.05953 38.71521, -77.05807 38.71882, -77.05035 38.7177, -77.04572 38.71582)))

Project counties: Prince George's, MD | Fairfax, VA



United States Department of Interior
Fish and Wildlife Service

Project name: Fort Hunt Park Site Development Plan

Endangered Species Act Species-list

Sensitive joint-vetch (*Aeschynomene virginica*)

Listing Status: Threatened

Small Whorled pogonia (*Isotria medeoloides*)

Listing Status: Threatened

Sensitive Joint-Vetch

Aeschynomene virginica



© M. Rollins

Description - The sensitive joint-vetch is an annual legume native to the eastern United States. Populations currently exist in Maryland, New Jersey, North Carolina, and Virginia. The historical range for the species extended to Delaware and Pennsylvania. In Virginia, populations are found along the Potomac, Mattaponi, Pamunkey, Rappahannock, Chickahominy, and James Rivers and their tributaries. This plant usually attains a height of three to six feet in a single growing season, but may grow as tall as eight feet. The flowers are yellow, streaked with red and the fruit is a pod, turning dark brown when ripe.

Life History - The joint-vetch occurs in fresh to slightly brackish tidal river systems, within the intertidal zone where populations are flooded twice daily. It typically occurs at the outer fringe of marshes or shores; its presence in marsh interiors may be a result of nutrient deficiencies, ice scouring, or muskrat

herbivory. The sensitive joint-vetch is found in localities where plant diversity is high and annual species are prevalent. Bare to sparsely vegetated substrates appear to be a habitat feature of critical importance for establishment and growth of this species. Plants flower from July through September and into October in some years. Fruits are produced from July through late October, concurrent with flowering.

Conservation - The sensitive joint-vetch was federally listed as a threatened species on June 19, 1992. Threats to the species include sedimentation, competition from non-native plant species, dams, dredging, filling, recreational activities, shoreline stabilization, shoreline structures, road and bridge construction, commercial and residential development, water withdrawal projects, water quality degradation, agricultural practices, introduced pest species, mining, timber harvest, over-visitation, declines in muskrat populations, rise in sea level (this may also be a result of natural cycles), and collection. Natural threats are often identified with disturbances, such as wave and ice action associated with severe storm events, competition, herbivory, channel migration, sea level rise and natural sedimentation processes. Adequate habitat conservation for this species will only be achieved through on-site protection of marshes supporting plant populations when coupled with protection of the natural ecological processes responsible for creating and maintaining habitat for the sensitive joint-vetch.

What You Can Do To Help -

Avoid the use of herbicides in or near waterways. If you are planning construction or stabilization activities along the shoreline in one of the counties indicated on the attached map, please contact the U.S. Fish and Wildlife Service.

References

- Davison, S.E. and L.P. Bruderle. 1984. Element stewardship abstract for *Aeschynomene virginica* - sensitive joint vetch. The Nature Conservancy. Arlington, Virginia.
- Hershner, C. and J.E. Perry. 1987. Population status of potentially threatened vascular plants from coastal plain tidal rivers in Virginia. College of William and Mary, Virginia Institute of Marine Science, Gloucester Point, Virginia.
- Rouse, G.D. 1994. Sensitive joint-vetch life history and habitat study, 1993 Field Season, Mattaponi and Rappahannock River systems, Virginia. Schnabel Environmental Services. Richmond, Virginia.
- U.S. Fish and Wildlife Service. 1995. Sensitive joint-vetch (*Aeschynomene virginica*) recovery plan. Hadley, Massachusetts.



U.S. Fish and Wildlife Service
Virginia Field Office
6669 Short Lane
Gloucester, Virginia 23061
(804) 693-6694
<http://www.fws.gov>
August 1999

Small Whorled Pogonia

Isotria medeoloides



© D.D. Tyler

Description - The small whorled pogonia is a herbaceous perennial orchid. It has a widely scattered distribution in the eastern United States along the Atlantic coast from Maine to Georgia with outlying occurrences in the midwest and Canada. This species has pale green, elliptical leaves, usually five or six, that grow in a single whorl at the top of a hairless, grayish-green stem. The one or two flowers per plant are yellowish-green, unscented, and form in the center of the whorl.

Life History - In Virginia, the small whorled pogonia is found in ordinary looking third-growth upland forests with an open understory and a closed canopy where the topography is typically moderately sloping or almost level. The plants are usually associated with decaying vegetative matter such as fallen trunks and limbs, leaf litter, bark, and tree roots. The pogonia is found in soils that are acidic sandy loams with low nutrient

content. The flowers appear in late April to mid-May. The small whorled pogonia reproduces primarily through self-pollination and occasionally vegetatively. It is often confused with the Indian cucumber-root (*Medeola virginiana*) and the large whorled pogonia (*Isotria verticillata*). The Indian cucumber-root has deep green leaves with a stem that is thin, hairy, and wiry. The large whorled pogonia has a reddish-purple stem and dark green leaves; its flower is reddish-purple.

Conservation - The small whorled pogonia was federally listed as an endangered species on September 10, 1982. It was reclassified as threatened on November 7, 1994. This was possible because at the time of reclassification 61% of the viable populations had been protected. The small whorled pogonia and its habitat continue to be threatened, directly and indirectly, by residential and commercial development. The upland habitat where it is found is seldom protected by federal or state laws unless it occurs on federally-owned property. Without voluntary landowner protection many pogonia populations have been and will be destroyed. Other threats to this species are collection by plant enthusiasts and browsing by white-tailed deer and invertebrates.

What You Can Do To Help - If you find a plant that appears to be the small whorled pogonia, take note of the location and photograph the plant, if possible. Please do not remove the plant!

Contact one of the following agencies for assistance:

Virginia Department of Agriculture
and Consumer Services
Office of Plant Protection
P.O. Box 1163
Richmond, Virginia 23209
(804) 786-3515

Virginia Department of
Conservation and Recreation
Division of Natural Heritage
217 Governor Street, 3rd Floor
Richmond, Virginia 23219
(804) 786-7951

U.S. Fish and Wildlife Service
Virginia Field Office
6669 Short Lane
Gloucester, Virginia 23061
(804) 693-6694

References

- U.S. Fish and Wildlife Service. 1992. Small whorled pogonia (*Isotria medeoloides*) recovery plan, first revision. Newton Corner, Massachusetts.
- Ware, D.M.E. 1991. Small whorled pogonia. Pages 95-97 in K. Terwilliger, ed. Virginia's Endangered Species, Proceedings of a Symposium. McDonald and Woodward Publishing Company, Blacksburg, Virginia.



U.S. Fish and Wildlife Service
Virginia Field Office
6669 Short Lane
Gloucester, Virginia 23061
(804) 693-6694
<http://www.fws.gov>
August 1999



United States Department of the Interior

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

IN REPLY REFER TO

N1621 (GWMP)

December 14, 2010

Ms. Ethel Eaton
Department of Historical Resources
Office of Review and Compliance
2801 Kensington Avenue
Richmond, Virginia 23221

Re: Site Development Plan, Fort Hunt Park, Fairfax County, Virginia
Subject: 36 CFR Part 800.8(c): *Use of the NEPA process for section 106 purposes.*

Dear Mr. Holma:

At Fort Hunt Park (the Park), the National Park Service (NPS) is preparing a Site Development Plan (SDP). The Fort Hunt Park SDP will be a plan for how the National Park Service will manage resources and provide visitor experiences at Fort Hunt Park, a site within the George Washington Memorial Parkway (GWMP).

Fort Hunt Park is located along the Potomac River in Fairfax County, Virginia (see attached Project Location Map). The proximity of the area, 11 miles south of the Nation's Capital, Washington, DC, dramatically affected the land use history. Except for the remains of four Endicott-era batteries, the shell of an old fire control station, and an old Non-Commissioned Officer's quarters, there is little to indicate that Fort Hunt's 105 acres has such a diverse history.



Figure 1– Battery Commanders Station and Battery Robinson Remains

Fort Hunt Park has been the scene of a constantly shifting panorama of people and activities which mirror the major social and political trends of the first half of this century. Seldom has one geographical area been put to so many different uses as has Fort Hunt. During its relatively short lifetime, the Park has seen service as George Washington’s farm; a coastal defense fort; an Army Finance school; a supply depot; a brigade headquarters, an ROTC training camp; a hospital for indigent Bonus Marchers; a Civilian Conservation Corps (CCC) camp; a NPS exhibits lab; a monitoring station for the Army Signal Corps; a top secret interrogation center for WWII German prisoners of war; and a film storage vault for the National Archives.

Currently the site serves as a picnic area to many local families and small groups, hosts Sunday night summer concerts, and an occasional recreational sports game.

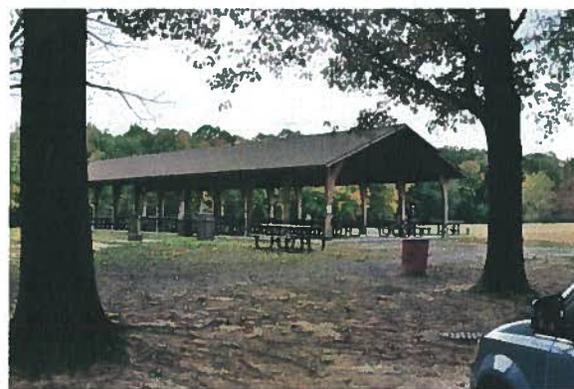


Figure 2 – Example of Permitted Recreational Use Area

The purpose of the SDP and associated Environmental Assessment/Assessment of Effects (EA/AoE) is to evaluate ways to enhance visitor experience by providing opportunities for in-depth information about the park’s history, to protect the park’s cultural and natural resources, and to increase park operational efficiency and safety. This purpose will be accomplished by locating current and future facilities at Fort Hunt Park while balancing recreational activities with education and research activities. This comprehensive planning effort will incorporate new historical and archeological resource data obtained by the park during the past 5 years. Increases in visitation and competing parks uses need to be assessed in order to preserve park resources and enhance visitor experiences. Through interpretation, education and new facilities, the visitor’s will gain a greater understanding of the rich history of Fort Hunt Park.

In order to comply with the National Environmental Policy Act (NEPA), an Environmental Assessment/Assessment of Effects (EA/AoE) will be prepared and distributed for public and agency review and comment. The development of the EA is in the preliminary stages. The implementation of the proposed rehabilitation may affect properties listed in or eligible to be listed in the National Register of Historic Places. In accordance with 36 CFR Part 800: *Protection of Historic Properties*, the NPS will comply with section 106 of the National Historic Preservation Act of 1966 (as amended). This scoping notice serves to officially initiate section 106 consultation with your office. Consultations have also been undertaken with the Advisory Council on Historic Preservation as well as other federal and state agencies, Native Americans traditionally associated with park lands, and the general public.

In addition, in accordance with 36 CFR Part 800.8(c): use of the NEPA process for Section 106 purposes, this letter serves as notification of our intent to use the NEPA process to meet the park's obligations under Section 106.

We have already identified consulting parties both for NEPA and Section 106 purposes and have established a preliminary Area of Potential Effect (APE), which encompasses all applicable historic properties that will potentially be physically and visually affected by the proposed action. (See attached figure.) Due to the prominence of Fort Hunt's location on high ground above the Potomac River, potential visual affects of the undertaking include the George Washington Memorial Parkway and Fort Washington Park, as well as Fort Hunt Park. Please note that the project alternatives are still being refined and as the project plans evolve, specific project elements may be altered that could require changes to the preliminary APE.

I would appreciate receiving any preliminary comments you may have by February 11, 2011. Comments can be mailed to:

Dottie Marshall
Superintendent, George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

If you need additional information or should you have any questions regarding this project, please feel free to contact Cultural Resource Manager, Matt Virta at 703-289-2535 or Matthew_Virta@nps.gov

Sincerely,



Jon G. James, Deputy Superintendent, George Washington Memorial Parkway
Acting Superintendent for Dottie P. Marshall

cc:
Advisory Council on Historic Preservation
The Virginia Council on Indians

bcc:
GWMP Files
GWMP IRRM Virta
DSC - Chitwood
DSC - Margo
G&O- Wiser

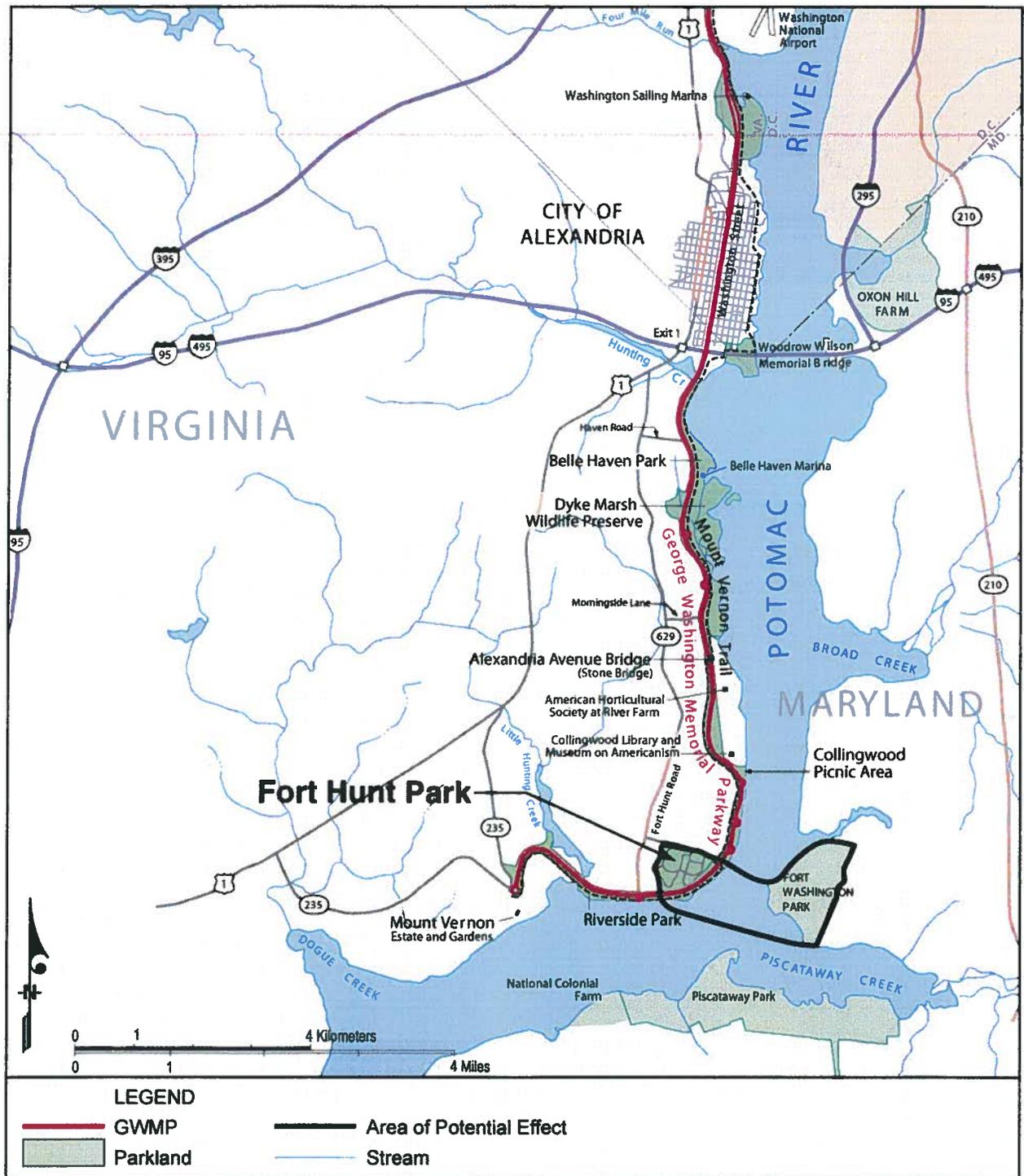


Figure 1. Project Location Map with Preliminary Area of Potential Effect



United States Department of the Interior

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

IN REPLY REFER TO

N1621 (GWMP)

December 14, 2010

Mr. Reid Nelson
Advisory Council on Historic Preservation
Director, Office of Federal Agency Programs
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 803
Washington, DC 20004
Att: Katry Harris

Re: Site Development Plan, Fort Hunt Park, Fairfax County, Virginia
Subject: 36 CFR Part 800.8(c): *Use of the NEPA process for section 106 purposes.*

Dear Mr. Nelson:

At Fort Hunt Park (the Park), the National Park Service (NPS) is preparing a Site Development Plan (SDP). The Fort Hunt Park SDP will be a plan for how the National Park Service will manage resources and provide visitor experiences at Fort Hunt Park, a site within the George Washington Memorial Parkway (GWMP).

Fort Hunt Park is located along the Potomac River in Fairfax County, Virginia (see attached Project Location Map). The proximity of the area, 11 miles south of the Nation's Capital, Washington, DC, dramatically affected the land use history. Except for the remains of four Endicott-era batteries, the shell of an old fire control station, and an old Non-Commissioned Officer's quarters, there is little to indicate that Fort Hunt's 105 acres has such a diverse history.



Figure 1 – Battery Commanders Station and Battery Robinson Remains

Fort Hunt Park has been the scene of a constantly shifting panorama of people and activities which mirror the major social and political trends of the first half of this century. Seldom has one geographical area been put to so many different uses as has Fort Hunt. During its relatively short lifetime, the Park has seen service as George Washington's farm; a coastal defense fort; an Army Finance school; a supply depot; a brigade headquarters, an ROTC training camp; a hospital for indigent Bonus Marchers; a Civilian Conservation Corps (CCC) camp; a NPS exhibits lab; a monitoring station for the Army Signal Corps; a top secret interrogation center for WWII German prisoners of war; and a film storage vault for the National Archives.

Currently the site serves as a picnic area to many local families and small groups, hosts Sunday night summer concerts, and an occasional recreational sports game.



Figure 2 – Example of Permitted Recreational Use Area

The purpose of the SDP and associated Environmental Assessment/Assessment of Effects (EA/AoE) is to evaluate ways to enhance visitor experience by providing opportunities for in-depth information about the park's history, to protect the park's cultural and natural resources, and to increase park operational efficiency and safety. This purpose will be accomplished by locating current and future facilities at Fort Hunt Park while balancing recreational activities with education and research activities. This comprehensive planning effort will incorporate new historical and archeological resource data obtained by the park during the past 5 years. Increases in visitation and competing parks uses need to be assessed in order to preserve park resources and enhance visitor experiences. Through interpretation, education and new facilities, the visitor's will gain a greater understanding of the rich history of Fort Hunt Park.

In order to comply with the National Environmental Policy Act (NEPA), an Environmental Assessment/Assessment of Effects (EA/AoE) will be prepared and distributed for public and agency review and comment. The development of the EA is in the preliminary stages. The implementation of the proposed rehabilitation may affect properties listed in or eligible to be listed in the National Register of Historic Places. In accordance with 36 CFR Part 800: *Protection of Historic Properties*, the NPS will comply with section 106 of the National Historic Preservation Act of 1966 (as amended). This scoping notice serves to officially initiate section 106 consultation with your office. Consultations have also been undertaken with the Commonwealth of Virginia State Historic Preservation Office as well as other federal and state agencies, Native Americans traditionally associated with park lands, and the general public.

In addition, in accordance with 36 CFR Part 800.8(c): *Use of the NEPA process for section 106 purposes*, this letter serves as notification of our intent to use the NEPA process to meet the park's obligations under Section 106. We have already identified consulting parties both for NEPA and section 106 purposes and are now working to identify all applicable historic properties in the area of potential effects.

I would appreciate receiving any preliminary comments you may have by February 11, 2011.
Comments can be mailed to:

Dottie Marshall
Superintendent, George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

If you need additional information or should you have any questions regarding this project, please feel free to contact Natural Resource Manager, Matt Virta at 703-289-2535 or Matthew_Virta@nps.gov.

Sincerely,



Jon G. James, Deputy Superintendent, George Washington Memorial Parkway
Acting Superintendent for Dottie P. Marshall

cc:
The Virginia Council on Indians

bcc:
GWMP Files
GWMP IRRM M. Virta
DSC – C. Chitwood
DSC – **M. Brooks**
G&O- J. Wiser

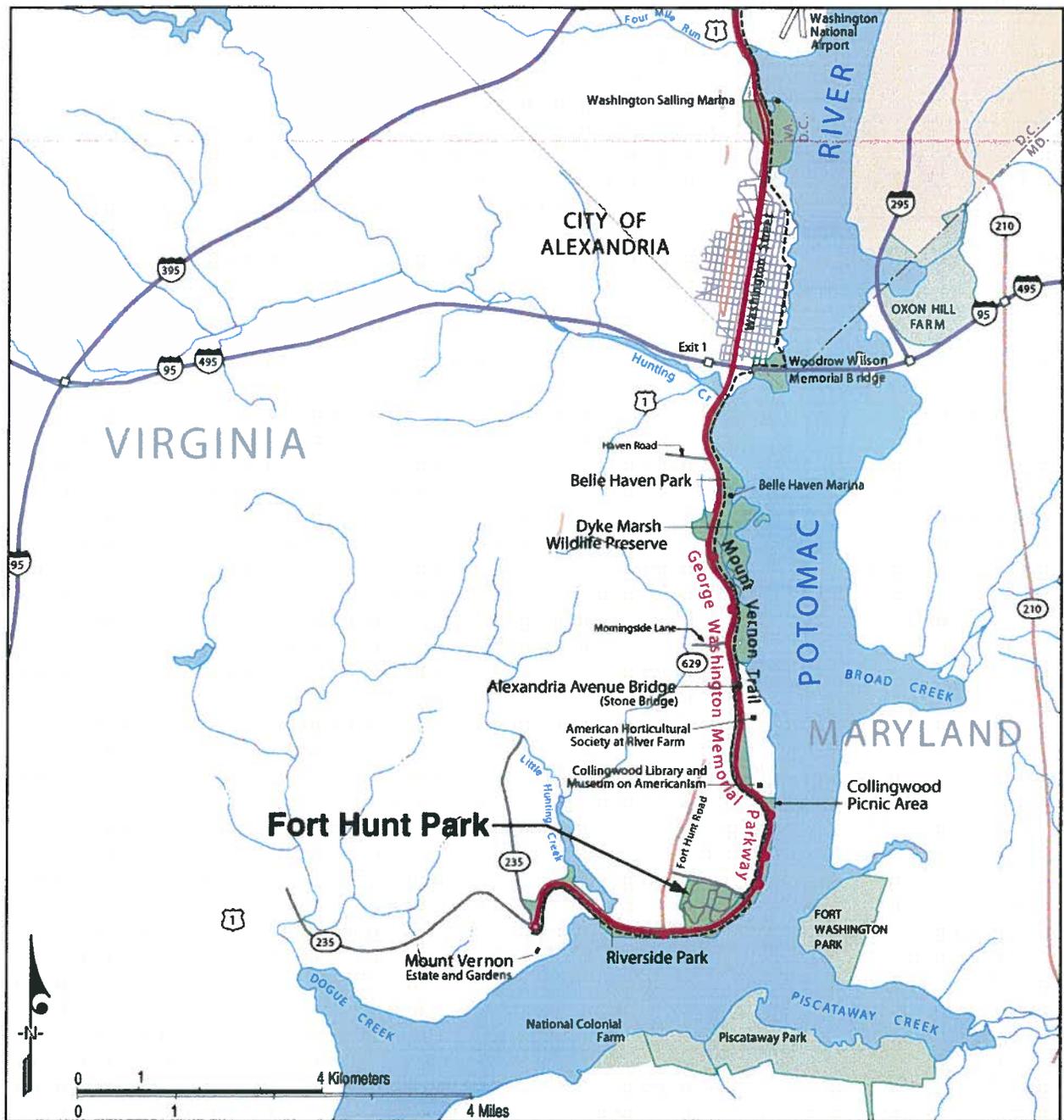


Figure 1. Project Location Map

Douglas W. Domenech
Secretary of Natural Resources



David A. Johnson
Director

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

Division of Natural Heritage
217 Governor Street
Richmond, Virginia 23219-2010
(804) 786-7951

December 10, 2010

Dottie Marshall
National Park Service
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Re: Fort Hunt Park

Dear Ms. Marshall:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files the Mount Vernon Shoreline Conservation Site, is within the project vicinity. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Mount Vernon Shoreline Conservation Site has been given a biodiversity significance ranking of B5, which represents a site of general significance. The natural heritage resource of concern at this site is:

Haliaeetus leucocephalus

Bald eagle

G5/S2S3B,S3N/NL/LT

Bald eagles are often found in the midst of large wooded areas near marshes or other bodies of water (Byrd, 1991). Bald eagles feed on fish, waterfowl, seabirds (Campbell et. al., 1990), various mammals and carrion (Terres, 1980). Threats to this species include human disturbance of nest sites (Byrd, 1991), habitat loss, biocide contamination, decreasing food supply and illegal shooting (Herkert, 1992). Please note that this species is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

DCR recommends contacting the Center for Conservation Biology at the College of William and Mary, phone: 757.221.1645 or email: conbio@wm.edu to obtain updated bald eagle information. If bald eagle nests are identified within .25 miles of the project area, DCR also recommends coordination with VDGIF to ensure compliance with protected species legislation.

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the Virginia Department of Conservation and Recreation (DCR), DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

Our files do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The Virginia Department of Game and Inland Fisheries maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Shirl Dressler at (804) 367-6913.

Should you have any questions or concerns, feel free to contact me at 804-692-0984. Thank you for the opportunity to comment on this project.

Sincerely,



Alli Baird, LA, ASLA
Coastal Zone Locality Liaison

Cc: Amy Ewing, VDGIF

Literature Cited

Byrd, M.A. 1991. Bald eagle. In *Virginia's Endangered Species: Proceedings of a Symposium*. K. Terwilliger ed. The McDonald and Woodward Publishing Company, Blacksburg, Virginia. Pp. 499-501.

Campbell, R.W., N.K. Dawe, I. McTaggart-Cowan, J.M. Cooper, G.W. Kaiser, and M.C.E. McNall. 1990. *The Birds of British Columbia. Vol. 1. Nonpasserines: Introduction and loons through waterfowl*. Royal British Columbia Museum, Victoria, British Columbia, Canada.

Herkert, J. R., editor. 1992. *Endangered and threatened species of Illinois: status and distribution. Vol. 2: Animals*. Illinois Endangered Species Protection Board. iv + 142 pp.

Terres, J.K. 1980. *The Audubon Society encyclopedia of North American birds*. Alfred A. Knopf, New York.



United States Department of the Interior

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

NOV 17 2010

IN REPLY REFER TO
N1621 (GWMP)

Section 7 Coordinator
U.S. Fish and Wildlife Service
Virginia Field Office
6669 Short Lane
Gloucester, VA 23061

To Whom It May Concern:

This letter serves as notification we have begun the National Environmental Policy Act (NEPA) process and are proposing to have an Environmental Assessment (EA) available for public and regulatory review in the near future. In addition, this letter serves as record the National Park Service (NPS) is initiating section 7 consultation with your agency pursuant to the requirements of the 1973 Endangered Species Act, as amended. In order to comply, we are requesting information concerning federal rare, threatened, and endangered species documented or reasonably suspected within 0.5 miles of the project site, which is depicted on the enclosed map.

We are aware of breeding and transient bald eagles in the general vicinity. Should you know of or come across any other resource constraint that may be a possible planning issue, please do not hesitate to contact us. We anticipate no significant environmental impacts associated with the project and look forward to receiving any guidance or comments you may have regarding the process or the project itself.

Fort Hunt Park is located along the Potomac River in Fairfax County, Virginia. The proximity of the area, 11 miles south of the Nation's Capital, Washington, D. C., dramatically affected the land use history. Except for the crumbling remains of four Endicott-era batteries, the decrepit shell of an old fire control station, and an old Non-Commissioned Officer's quarters, there is little to indicate Fort Hunt's 105 acres had such a diverse history.

Fort Hunt Park has been the scene of a constantly shifting panorama of people and activities which mirror the major social and political trends of the first half of this century. Seldom has one geographical area been put to so many different uses as Fort Hunt. During its relatively short lifetime, it has seen service as George Washington's farm; a coastal defense fort; an Army Finance school; a supply depot; a brigade headquarters, an ROTC training camp; a hospital for indigent Bonus Marchers; a Civilian Conservation Corps (CCC) camp; a National Park Service

exhibits lab; a monitoring station for the Army Signal Corps; a top secret interrogation center for WWII German prisoners of war; and a film storage vault for the National Archives.

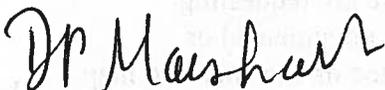
Currently the site serves as a picnic area to many local families and small groups, hosts Sunday night summer concerts, and an occasional recreational sports game.

The goal of this project is to develop a Site Development Plan (SDP) and Environmental Assessment/Assessment of Effects (EA/AoE) for Fort Hunt Park. The purpose of the SDP and EA/AoE is to evaluate ways to enhance visitor experience by providing opportunities for in-depth information about the park's history, to protect the park's cultural and natural resources, and to increase park operational efficiency and safety.

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Thank you for your anticipated assistance with this matter. If you need additional information or have any questions regarding this request, please contact me at (703) 289-2500.

Sincerely,



Dottie Marshall
Superintendent

Enclosures

Fort Hunt Park



bcc:

GWMP Files
GWMP IRRM Steury
GWMP IRRM Helwig
GWMP IRRM Mocko

RMocko:703-289-2540:11/17/2010



United States Department of the Interior

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

NOV 17 2010

IN REPLY REFER TO
N1621 (GWMP)

Rene Hypes
Section 7 Coordinator
Department of Conservation and Recreation
Division of Natural Heritage
217 Governors St. 3rd Floor
Richmond, VA 23219

Dear Ms. Hypes:

This letter serves as notification we have begun the National Environmental Policy Act (NEPA) process and are proposing to have an Environmental Assessment (EA) available for public and regulatory review in the near future. In addition, this letter serves as record the National Park Service (NPS) is initiating section 7 consultation with your agency pursuant to the requirements of the 1973 Endangered Species Act, as amended. In order to comply, we are requesting information concerning state rare, threatened, and endangered species documented or reasonably suspected within 0.5 miles of the project site, which is depicted on the enclosed map.

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Thank you for your anticipated assistance with this matter. If you need additional information or have any questions regarding this request, please contact me at (703) 289-2500.

Sincerely,



Dottie Marshall
Superintendent

Enclosures

Fort Hunt Park



38 43' 07" N
77 03' 40" W

38 43' 07" N
77 02' 34" W

38 42' 34" N
77 03' 40" W

Legend

- Mount Vernon Trail
- Water
- Park Boundary



Produced by GWMP GIS

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bcc:

GWMP Files
GWMP IRRM Steury
GWMP IRRM Helwig
GWMP IRRM Mocko

RMocko:703-289-2540:11/17/2010



United States Department of the Interior



FISH AND WILDLIFE SERVICE

Ecological Services

6669 Short Lane

Gloucester, Virginia 23061

SEP 02 2010

Greetings:

Due to increases in workload and refinement of our priorities in Virginia, this office will no longer provide individual responses to requests for environmental reviews. However, we want to ensure that U.S. Fish and Wildlife Service (Service) trust resources continue to be conserved. When that is not possible, we want to ensure that impacts to these important natural resources are minimized and appropriate permits are applied for and received. We have developed a website, http://www.fws.gov/northeast/virginiafield/endspecies/Project_Reviews.html, that provides the steps and information necessary to allow landowners, applicants, consultants, agency personnel, and any other individual or entity requiring Service review / approval of their project to complete a review and come to the appropriate conclusion.

The website will be frequently updated to provide new species / trust resource information and methods to review projects, so refer to the website for each project review to ensure that current information is utilized.

If you have any questions about project reviews or need assistance, please contact Tylan Dean of this office at (804) 693-6694, extension 166, or tylan_dean@fws.gov. For problems with the website, please contact Mike Drummond of this office at mike_drummond@fws.gov.

Sincerely,

Cindy Schulz
Supervisor
Virginia Field Office

APPENDIX

C

DRAFT COASTAL ZONE MANAGEMENT ACT CONSISTENCY DETERMINATION



Coastal Zone Management Act Consistency Determination

For the Fort Hunt Park Site Development Plan

This document provides the Commonwealth of Virginia with the National Park Service's Consistency Determination and necessary data and information under Coastal Zone Management Act Section 307(c)(3)(A) and 15 CFR Part 930, sub-part D, for redevelopment of Fort Hunt Park in Fairfax County, Virginia. The following describes the proposed federal activities.

The National Park Service intends to redevelop Fort Hunt Park in a way that balances current visitor uses with an expanded interpretation program that enhances the site's cultural and historical resources. Existing facilities at the park include five picnic areas, pavilions, a loop road, trails, ball fields, a playground, a volleyball court, a maintenance yard, restrooms, and Park Police stables. In addition, the property contains several historic structures including four Spanish-American War Era Gun Batteries, a Battery Commander's Station, and a Non-Commissioned Officer's (NCO) quarters. Currently, three Action Alternatives are under consideration at Fort Hunt, as well as a No Action Alternative.

Proposed Action Alternatives

Under all of the proposed Action Alternatives, the following elements are proposed:

- Realignment of the park entrance road with new entry signage and gating. The lower portion of the main loop road around the park would be relocated to provide open space.
- Construction of a new visitor facility to provide interpretive and educational opportunities to park visitors. The visitor facility could occupy a footprint no larger than 6,400 square feet. The new building would be equipped with modern climate control and would connect to existing utility infrastructure at the park.
- Creation of a chronological interpretive trail system to provide a walking history of the park for visitors.
- Removal of a picnic pavilion, a parking lot, a restroom facility and a ball field to provide open spaces.
- Historical structures future undetermined treatment for enhancing the historical interpretive experience at the park.

Consistency Determination

The Virginia Coastal Resources Management Program contains the applicable enforcement policies listed in Table 1 - CZMA Policies and Effects for Fort Hunt Park. The National Park Service has determined that the implementation of the proposed Action Alternatives would result in the effects listed in Table 1.

Based on information, data, and analysis, the National Park Service finds that the proposed Action Alternatives for Fort Hunt Park are consistent to the maximum extent practicable with the enforceable policies of the Virginia Coastal Management Program. Construction of the proposed actions would result in negligible impacts to natural resources of the Commonwealth of Virginia's coastal zone, as described under the following applicable enforceable policies:

Table 1 - CZMA Policies and Effects for Fort Hunt Park

<p align="center">Applicable Enforcement Policy</p>	<p align="center">Effects of the Federally Proposed Action</p>
<p>Fisheries Management (VAC §28.2-200 through §28.2-713) (VAC §29.1-100 through §29.1-570)</p> <p>Two agencies regulate fisheries in Virginia – the Marine Resources Commission (MRC) and the Virginia Department of Game and Inland Fisheries. The agencies carry out State conservation and enhancement programs effecting finfish and shellfish resources. Fisheries management includes the State Tributyltin (TBT) Regulatory Program, designed to monitor boat painting activities which are threatening to marine animal species (VAC §3.1-249.59 through §3.1-249.62).</p>	<p>No effect.</p> <p>The proposed Action Alternatives would not involve any disturbance of open waters. As a result, there would be no effects on fish spawning, nursery or feeding grounds. No marine paints would be used under the proposed actions.</p>
<p>Subaqueous Lands Management (VAC §28.2-1200 through §28.2-1213)</p> <p>In order to protect State-owned submerged lands, the Marine Resources Commission (MRC) regulates the use of subaqueous beds in Virginia. According to the Virginia Code, “it shall be unlawful and constitute a Class I misdemeanor for anyone to build, dump, or otherwise trespass upon or over or encroach upon or take or use any material from the beds of the bays and ocean, rivers, streams, creeks, which are the property of the Commonwealth, unless such act is pursuant to statutory authority or a permit by the Marine Resources Commission” (MRC 2011).</p>	<p>No effect.</p> <p>The proposed Action Alternatives would not cause any disturbance to submerged lands or subaqueous bed materials. There are no submerged lands at Fort Hunt Park. No impacts to bottomlands of the Potomac River would be required by the proposed actions.</p>
<p>Wetlands Management (VAC §28.2-1301 through §28.2-1320) (VAC §62.1-44.15.5)</p> <p>Impacts to tidal wetlands are regulated under the Virginia Tidal Wetlands Act, carried out by the MRC. Tidal and nontidal wetlands receive federal protection from Section 404 of the Clean Water Act. The Virginia Department of Environmental Quality (DEQ) administers the Virginia Water Protection Permit program, designed to comply with federal wetland regulation (DEQ 2011b).</p>	<p>No effect.</p> <p>A small nontidal wetland area exists in the southern extents of Fort Hunt Park. Under all of the proposed Action Alternatives, any disturbance to the wetlands would be avoided. The wetlands are approximately 400 feet from proposed construction activities, and are buffered by a mature forest stand. During construction, a Sediment and Erosion Control Plan would be implemented to contain site runoff. Therefore, because construction of the Action Alternatives would not cause any alteration to existing wetland acreage or function, there would be no impacts to wetlands.</p>

Applicable Enforcement Policy	Effects of the Federally Proposed Action
<p>Dunes Management (VAC §28.2-1400 through §28.2-1420)</p> <p>The Coastal Primary Sand Dune Protection Act was enacted in 1980 in order to control development in coastal primary sand dunes. The Act defines a dune as “a mound of unconsolidated sandy soil which is contiguous to mean high water, whose landward and lateral limits are marked by change in grade from ten percent or greater to less than ten percent and upon any part of which is growing as of July 1, 1980, or grows thereon subsequent thereto, any one or more of ten plant species associated with dunes” (MRC 1980). Policies of the Act are enforced by the MRC.</p>	<p>No effect.</p> <p>Because there are no dunes at Fort Hunt Park, no impacts to dune resources would result from the proposed Action Alternatives.</p>
<p>Non-Point Source Pollution Control (VAC §10.1-560 et seq.)</p> <p>The goal of Virginia’s Erosion and Sediment Control Program is “to control soil erosion, sedimentation, and nonagricultural runoff from regulated land-disturbing activities” in order to prevent degradation of property and natural resources. The program is implemented by the Department of Conservation and Recreation. Regulated land-disturbing activities include any land change on public or private land that may result in soil erosion from water or wind and the movement of sediments into state waters or onto lands in the commonwealth, including, but not limited to, clearing, grading, excavating transporting, and filling of land.” Regulations apply to disturbances equal to or exceeding 10,000 square feet in area (DCR 2011).</p>	<p>No effect.</p> <p>The proposed Action Alternative would require ground disturbances greater than 10,000 square feet in area for the construction of park facilities. All construction would take place in previously disturbed areas. Construction would adhere to the procedures outlined in a State-approved Erosion and Sediment Control Plan. Site-specific best management practices (BMPs) would be utilized during construction, thereby minimizing the potential for sediment release. All of the proposed Action Alternatives would include site drainage improvements which would prevent soil erosion. Therefore, due to short-and long-term erosion and sediment controls, no non-point source pollution is expected.</p>
<p>Point Source Pollution Control (VAC §62.1-44.15)</p> <p>Point sources pollution is regulated by Section 402 of the Clean Water Act. Pursuant to the Act, Virginia administers the National Pollutant Discharge Elimination System (NPDES) through the State Water Control Board (DEQ 2011c).</p>	<p>No effect.</p> <p>Any additional point sources under the proposed Action Alternatives would be covered under the National Park Service’s existing NPDES general permit. No industrial activities are proposed at Fort Hunt Park, therefore no industrial activity permitting is necessary.</p>
<p>Shoreline Sanitation (VAC §32.1-164 through §32.1-165)</p> <p>Regulations pertaining to permitting, constructing, and operating onsite sewage systems are administrated by the Virginia Department of Health (VDH).</p>	<p>No effect.</p> <p>Fort Hunt Park is within the Fairfax County sewer service area. The proposed actions would not require installation of onsite sewage systems; therefore no shoreline sanitation compliance is needed.</p>

Applicable Enforcement Policy	Effects of the Federally Proposed Action
<p>Air Pollution Control (VAC §10-1.1300)</p> <p>The Clean Air Act, enacted by the U.S. Congress, is a series of programs designed to maintain National Ambient Air Quality Standards and to prevent the significant deterioration of air quality. Virginia maintains a State Implementation Plan (SIP) in order to meet the requirements of the Clean Air Act. The DEQ’s Division of Air Quality, on behalf of the State Air Pollution Control Board, is responsible for maintaining Virginia’s SIP (DEQ 2011).</p>	<p>Minor effects.</p> <p>None of the proposed Action Alternatives would result in long-term increased emissions at Fort Hunt Park. Temporary, small-scale increases in emissions would occur due to the use of equipment during construction; however, the increases would be too small to violate ambient air quality standards or significantly deteriorate existing conditions. Therefore, minor impacts would result from construction of the Action Alternatives.</p>
<p>Coastal Lands Management (VAC §10-1.2100 through §10-1.2114) (VAC §10-20-10 et seq.)</p> <p>The Chesapeake Bay Preservation Act (Bay Act) was adopted in 1988 in order to promote economic development and water quality protection. Tidewater localities are required to install programs in cooperation with Local Assistance Boards, in order to manage land uses in sensitive environmental areas. The local programs involve protection of Chesapeake Bay Preservation Areas through regulation (DCR 2011b).</p>	<p>No effect.</p> <p>Fort Hunt Park is located in Fairfax County, a Tidewater locality. A Resource Protection Area (RPA) is located in the southern portions of Fort Hunt Park, in the area of forested wetlands. Under all of the proposed Action Alternatives, disturbance to the RPA and its 100-foot buffer would be avoided. The RPA is approximately 400 feet from proposed construction activities, and is buffered by a mature forest stand. During construction, a Sediment and Erosion Control Plan would be implemented to contain site runoff. Therefore, because construction of the Action Alternatives would not cause any alteration to the RPA or its 100-foot buffer, there would be no impacts to wetlands.</p>

Based upon the following information, data, and analysis, the NPS finds that the Fort Hunt Park SDP EA/AoE is consistent to the maximum extent practicable with the enforceable policies of the Virginia Coastal Zone Management Program. Pursuant to 15 CFR Section 930.41, the Virginia Coastal Zone Management Program concurrence will be presumed if its response is not received by the NPS on the 60th day from receipt of this determination. Please send the response to:

Superintendent
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

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Fairfax County Virginia

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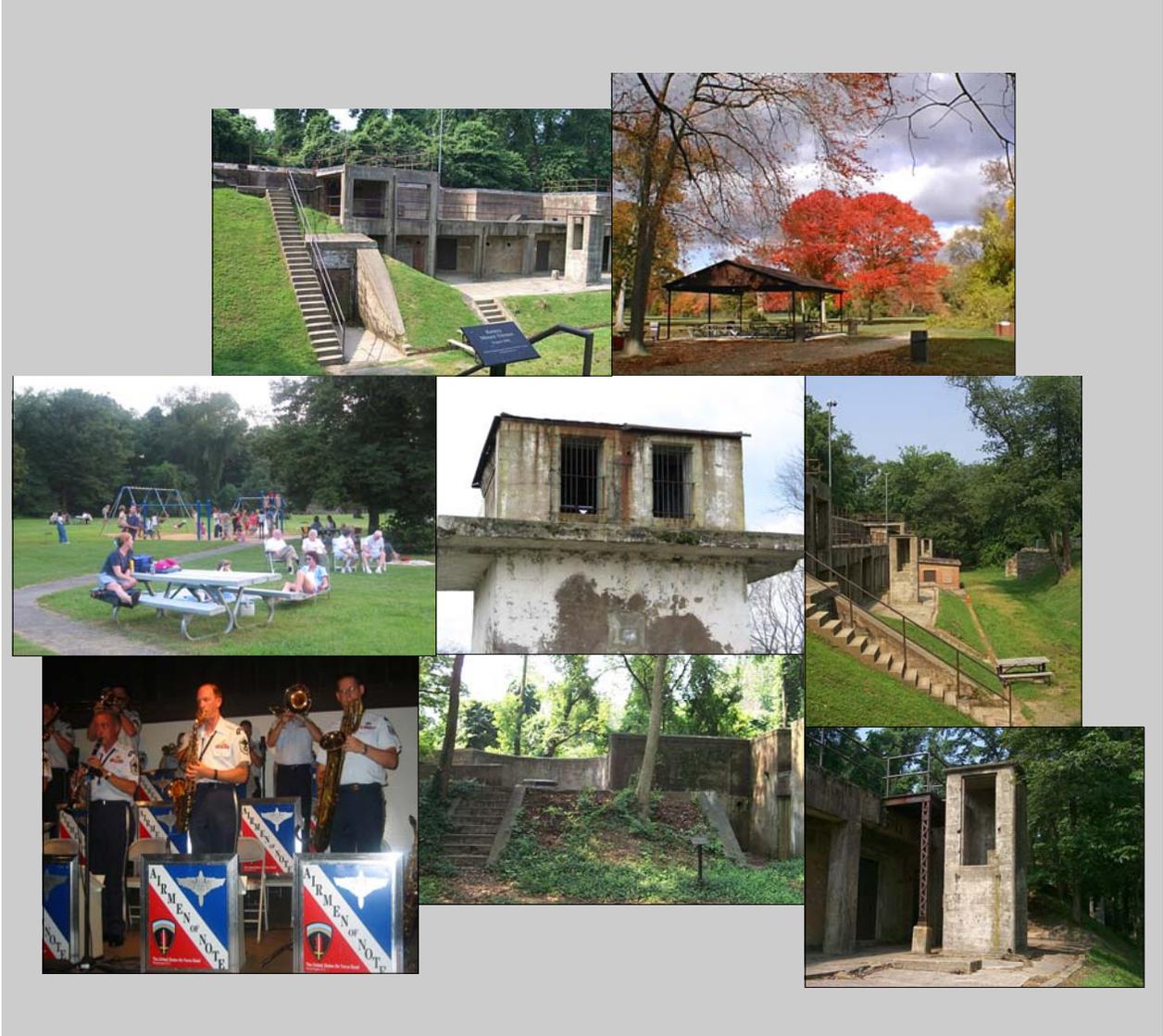
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- 1980 *Guidelines for Permitting of Activities Which Encroach into Coastal Primary Sand Dunes/Beaches*. (accessed online: http://www.mrc.virginia.gov/Regulations/dune_guidelines.pdf , 4/28/2011).

APPENDIX
D

FORT HUNT SECTION OF THE GWMP LONG-RANGE INTERPRETIVE PLAN



FORT HUNT PARK



PURPOSE

The purpose of Fort Hunt Park is to preserve and interpret the historical and natural resources and history of Fort Hunt.

SIGNIFICANCE

Fort Hunt's significance is attributed to the following factors:

- During the colonial period, George Washington owned and operated the area now known as Fort Hunt as part of his River Farm.
- Fort Hunt preserves the remains of a coastal defense system dating from the Spanish American War through World War I.
- In the 1930s Fort Hunt served as a camp for the Civilian Conservation Corps (CCC) which completed many projects in the metropolitan Washington, D.C. area.
- During World War II the site was utilized as a Joint Interrogation Center for captured German submarine officers and crew, as well as a super top secret center for the development of escape devices for American prisoners-of-war abroad.
- Fort Hunt contains some of the largest contiguous areas of Coastal Plain Forest found in GWMP.

INTERPRETIVE THEMES

Interpretive themes are those ideas/concepts that are key to helping visitors gain an understanding of the park's or area's significance and resources. The themes, which are based on the purpose and resource significance statements, provide the foundation for all interpretive media and programs. The themes do not include everything that may be interpreted, but they do address those ideas that are critical to understanding and appreciating the park's or site's importance. All

interpretive efforts (through both personal and non-personal services) should relate to one or more of the themes, and each theme should be addressed by some part of the overall interpretive program.

Effective interpretation is achieved when visitors are able to connect the concepts with the resources and derive something meaningful from their experience.

In addition to, and based on parkway-wide interpretive theme elements presented in Part 2 of this document, the following site specific theme statements will provide the basis for interpretation at Fort Hunt Park.

Theme 1 - *River Farm*

During the colonial period, the site was managed as part of George Washington's River Farm—a farm that utilized slave labor.

Theme 2 - *Coastal Defense*

The coastal defenses at Fort Hunt were the most modern fortifications available during the late 19th century and were strategically placed to protect the nation's most vital cities and ports.

Theme 3 - *Prisoner of War Camp*

Fort Hunt was used as the initial internment and interrogation center for German submarine officers and crew captured during World War II.

Theme 4 - *Military Intelligence Technology*

Fort Hunt's history includes the development and dissemination of top secret military packages filled with hidden escape devices, which were sent to American POWs abroad.

Theme 5 - *Civilian Conservation Corps (CCC)*

The CCC, with camps located throughout the country including Fort Hunt, completed a wide variety

“Fort Hunt Park has been the scene of a constantly shifting panorama of people and activities which mirror the major social and political trends of the first half of this century. Seldom has one geographical area been put to so many different uses as has Fort Hunt.”

--from “Fort Hunt - The Forgotten Story”

of public service projects throughout the parkway, Washington, D.C. area, and across the nation.

VISITOR EXPERIENCE GOALS

In addition to elements of the parkway-wide goals in Part 2 of this document, the following defines the desired visitor experience goals that would be achieved with the implementation of this long-range interpretive plan. The statements describe conditions that would exist, rather than specific actions to achieve the objective.

Visitors to Fort Hunt will have the opportunity to:

- Learn something about each of the interpretive themes.
- Make intellectual and emotional connections with park resources.
- Experience some form of interpretation and/or education program.
- Imagine the historic uses of Fort Hunt throughout time.
- Visualize the site's development and uses over time.
- Enjoy a variety of recreational activities.
- Obtain information about future interpretive and educational programs.
- Be aware of safety issues around the battery ruins.
- Find information about volunteer opportunities at the park

EXISTING CONDITIONS, ISSUES AND INFLUENCES

The following is a summary description of the experiences and conditions as they existed during this long-range interpretive planning process. This section is intended to identify baseline conditions and highlight key issues to help justify many of this plan's recommendations. The purpose is not to describe all existing conditions,

activities, and programs.

A site map can be found in the Maps section in Appendix A.

Fort Hunt Park is administered through the parkway's Virginia District. Visitors can access the site by vehicle from the parkway and from multiple pedestrian access points along the park boundary.

A series of eight wayside exhibits have recently been developed to interpret the site's varied past, including the extant Spanish-American War fortifications, the Civilian Conservation Corps (CCC) camp, the former secret World War II prisoner of war interrogation center, etc.

Bulletin boards with information about using the facilities and interpretive activities are located at the site. There are no other interpretive facilities.

Parkway staff provide a variety of interpretive programs at the site.

The parkway web site includes a separate page on Fort Hunt Park. This page describes the recreation activities available and the site's multi-faceted history. Two expanded pages provide more in-depth historic accounts.

VISITATION AND VISITOR USE

The following information regarding park visitors and visitor use is derived from data maintained by the NPS Socio-Economic Services Division (WASO) in Denver and discussions with park staff. Refer to the Visitation and Visitor Use description in Part 2 of this document for information on how Fort Hunt Park relates to parkway wide visitor data.

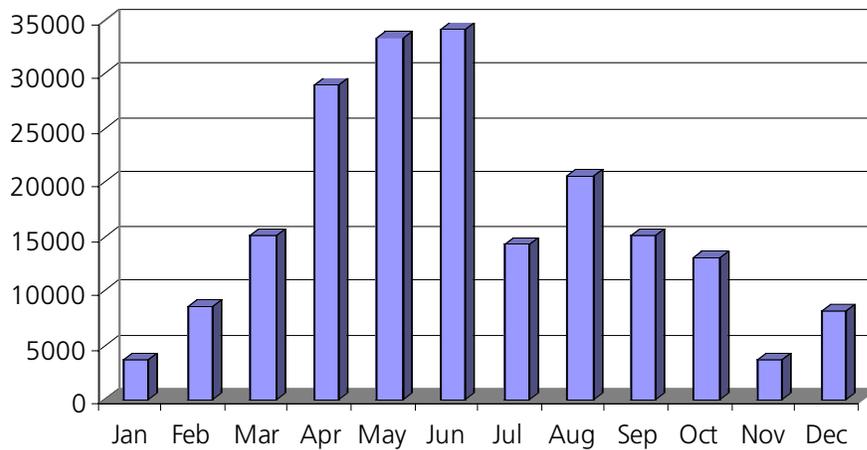
Total annual visitation for Fort Hunt Park for 2004 was 198,996. Figure 11

“Fort Hunt is a particularly rewarding site for political and social study. From the militant eagerness of the 1890s to the security consciousness of the 1940s, it was a living laboratory for the national mood.”

--from “Fort Hunt - The Forgotten Story”

Figure 11

Monthly Visitation 2004



illustrates the total monthly visitation for 2004.

Picnicking and related recreation activities are the reasons most visitors come to the site. No visitor surveys have been conducted at Fort Hunt Park.

RECOMMENDATIONS

The following is a description of program and media recommendations designed to further define, support, and communicate the site's purpose, resource significance, interpretive themes, and visitor experience goals. Implementation of these recommendations will help ensure that visitors are well prepared and informed, and that they will be able to develop meaningful connections with tangible and intangible resources.

The discussion of each program or media proposal identifies its purpose, special considerations, and sometimes suggests specific means of presentation. It is important to remember that the latter are only suggestions and should not in any way limit the creativity essential during the media and program planning and design processes. On the other hand, proposals will be specific enough to provide meaningful guidance, develop Class C

cost estimates, prepare PMIS submissions, and define the parameters within which these creative energies can flow.

In addition to the following recommendations for Fort Hunt Park, please refer to the parkway-wide recommendations in Part 2 of this document

Personal services interpretive activities at Fort Hunt Park will continue. They have been popular with visitors and they address key interpretive themes.

Wayside exhibits for Fort Hunt Park have been developed and will soon be fabricated and installed. In addition to interpretive messages to help visitors establish connections with the resources, the wayside exhibits also should convey an identity with the parkway and NPS. The wayside plan for Fort Hunt Park should include a parkway-wide orientation exhibit (see the parkway wide Wayside Exhibit section in Part 2 of this document).

Future site publications should be created with regard to design uniformity with other parkway literature and for compliance with NPS graphic identity standards.

The resources and themes at Fort Hunt Park offer excellent opportu-

nities for the development of curriculum-based education programs. This might be a good site to explore the development of programs that could be conducted primarily by teachers with minimal involvement from park staff. More information on this approach can be found in the parkway-wide Education Program section in Part 2 of this document. Parkway staff also should explore the potential of an educational partnership with Fort Washington directly across the river. The Fort Hunt page on the parkway web site should include a description of the various interpretive and educational programs available and a link to the future parkway-wide education page.