George Washington Memorial Parkway

Fort Hunt Park
Fairfax County, Virginia

National Park Service
U.S. Department of the Interior

Fort Hunt Park Site Development Plan

George Washington Memorial Parkway

ENVIRONMENTAL ASSESSMENT AND ASSESSMENT OF EFFECT

July 1, 2015

PROJECT SUMMARY

INTRODUCTION

The National Park Service (NPS) is developing a Site Development Plan (SDP) for Fort Hunt Park, administered by George Washington Memorial Parkway (GWMP) in Fairfax County, Virginia. This Environmental Assessment (EA) analyzes the potential impacts of three alternatives, including a No Action Alternative, on the natural, cultural, and human environment in accordance with the National Environmental Policy Act (NEPA) of 1969, the regulations of the Council on Environmental Quality (CEQ) for implementing the Act (40 Code of Federal Regulations 1500-1508), the NPS Director's Order-12 (DO-12) (*Conservation Planning, Environmental Impact Analysis, and Decision-making*) (NPS 2001).

PURPOSE OF AND NEED FOR THE ACTION

The purpose of the SDP is to improve the visitor experience and to define specific resource conditions to provide direction for park management. The plan seeks to:

- Enhance visitor experiences and connections with park resources.
- Protect park resources.
- Create a balance of park use that optimizes recreation and resource protection.

Based on public demand and NPS resource management priorities, there is a need to:

- Balance the different types of visitor use with resource protection.
- Meet the demand by the public for additional interpretation.
- Change the existing facilities and/or add new facilities.

Recent discoveries regarding the site's history during World War II (WWII) have expanded opportunities and increased demand by the public for additional interpretation. During WWII, Fort Hunt was utilized as a top secret intelligence operation for the interrogation of Axis prisoners of war (POWs) (NPS n.d.b). The records for this operation were recently declassified, and a great deal of new information regarding the site's history has come to light which has resulted in increased interest in Fort Hunt Park. This recent attention has highlighted the various periods of the site's historic significance and the need for enhanced interpretation.

Peak visitation periods exceed the park's carrying capacity, with recreation, permitted picnicking, and interpretation popular visitor activities that utilize park facilities. The demands for these varied park uses create a need to balance the different types of visitor use with resource protection. This planning process has also brought attention to the importance of Fort Hunt Park to the local and regional community for its existing recreational uses and expanded interpretation, and the need to maintain and/or add new facilities to the extent feasible.

ALTERNATIVES

This EA analyzes the No Action Alternative along with two Action Alternatives for the SDP for Fort Hunt Park. Both action alternatives (Alternatives 4 and 5) would establish a visitor services zone to provide orientation and interpretation services. Both action alternatives would also include the installation of interpretive trails and a fitness circuit, new playground equipment, and re-established viewsheds from Battery Robinson. Also included are the option to remove and realign segments of the park's main loop road, as well as to remove Area E Restrooms (which are closed seasonally) and Parking Area, in order to enhance long term protection and interpretation of resources within Historic Land Use Restoration Areas. Alternatives 2 and 3 were considered but dismissed, and are therefore not analyzed under this EA.

Alternative 1 – No Action Alternative – Under the No Action Alternative, the NPS would continue to maintain and manage Fort Hunt Park as it does today. There would be no realignment of vehicular circulation throughout the park. Permitted picnicking and recreation facilities would continue to dominate the park's uses.

Alternative 4: Interior Visitor Services – Under Alternative 4, NPS would establish a visitor services zone in Area C within the central portion of Fort Hunt Park. The key purpose of the proposed visitor services zone in this area would be to enhance interpretation and education of Fort Hunt Park's historic significance. For instance, the interpretive trail would link to Area C. This alternative builds on Alternative Concept 4 presented in June 2012, with the selected zone for siting of the visitor contact station identified to avoid areas of known sensitive resources and take advantage of previously disturbed areas. In order to accommodate the new visitor services function within Area C, the number of people accommodated by reservations for Picnic Pavilion C may be reduced. Removal of the pavilion would be contingent on further archeological study as well as determination of compatibility of uses. As detailed in Common to All Action Alternatives, this plan only evaluates a new visitor contact station at a conceptual level. A new restroom could be located in Picnic Area C.

Alternative 5: Gateway Visitor Services (Preferred Alternative) – The focus of Alternative 5 would be to enhance the visitor experience and interpretive facilities, ensure the long-term sustainability of facilities, and reduce the impact of the built environment on the area's natural and scenic resources as much as possible. Alternative 5 would establish a visitor services zone near the entrance to Fort Hunt Park at a rehabilitated historic NCO Quarters and/or repurposed office space in Picnic Pavilion A. In addition, this alternative may expand the small parking area near the entrance to the NCO Quarters. Alternative 5 lessens the footprint of site development by reusing the NCO Quarters, an existing historic structure within the site that is in need of rehabilitation, and adapting it to be used as a visitor contact station.

SUMMARY OF IMPACTS

Impacts of the proposed alternatives were assessed in accordance with NEPA and DO-12, which require impacts to park resources to be analyzed in terms of their context, duration, and intensity; and the National Historic Preservation Act (NHPA). Several impact topics were dismissed from further analysis because the proposed action alternative would result in negligible to minor impacts to those resources. No major impacts are anticipated as a result of this project.

NOTE TO REVIEWERS AND RESPONDENTS

We value and welcome your input on this project. The public comment period closes on August 7, 2015. The preferred system for receiving public comments electronically is through the NPS Planning, Environment, and Public Comment (PEPC) website, where the SDP EA is publicly posted on the Internet. The PEPC database is a tool used by the NPS to manage official correspondence and analyze public comment in the planning process. The website address is http://parkplanning.nps.gov/forthunt. You may complete a comment form online.

You can also mail comments to:

Claire Rozdilski, Acting Environmental Protection Specialist
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, VA 22101

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. Thank you for your interest in Fort Hunt Park and your input in this project.

TABLE OF CONTENTS

CHAPTER 1: PURPOSE AND NEED

INTRODUCTION

INTRODUCTION TO THE PLAN

The National Park Service (NPS) has developed this Site Development Plan (SDP) and Environmental Assessment (EA) for Fort Hunt Park, a 157.4-acre area administered by the George Washington Memorial Parkway (GWMP)[1] in Fairfax County, Virginia. This SDP/EA follows a previous plan released in September 2011 and includes new alternatives that respond to public feedback received and additional analysis conducted. It analyzes the potential impacts of three alternatives, including a no action alternative (Alternative 1), on the natural, cultural, and human environment. The EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended, and implementing regulations, 40 Code of Federal Regulations (CFR) Parts 1500-1508, NPS Director's Order 12 and the handbook, *Conservation Planning, Environmental Impact Analysis, and Decision-making* (DO-12). Compliance with Section 106 of the National Historic Preservation Act of 1966 (NHPA) has been initiated and occurs separate, yet parallel, to the NEPA process.

The Fort Hunt Park SDP is intended to guide NPS in decisions regarding the management of park resources and visitor use and experiences. The SDP includes two action alternatives that consider potential changes to existing facilities as well as the addition of new facilities. More specifically, both action alternatives (Alternatives 4 and 5) include consideration of the following common elements/objectives:

- Construct new interpretative trail
- Restore historic sight line to Potomac River from Battery Robinson
- Establish Historic Land Use Restoration Areas, including the repurposing of the ballfield in Area D to accommodate multiple recreation types
- Enhance access and recreational amenities on lower shared use trail for pedestrians and bicycles (closed lower road)
- Upgrades to safety and accessibility of Area A playground equipment
- Maintain existing roadway configuration with option for limited road removal and realignment

Alternative 4 considers an enhanced visitor services function, potentially in the form of a visitor contact station, established within a selected zone in Area C. Alternative 5, the NPS preferred alternative, considers rehabilitation and adaptive reuse of the historic Non-Commissioned Officer's (NCO) Quarters to serve a visitor services function. Both action alternatives include the option for limited removal and realignment of segments of the park's main loop road, as well as removal of Area E Restrooms (closed seasonally), and Parking Area, to enhance long term protection and interpretation of resources within Historic Land Use Restoration Areas.

1. In this EA, George Washington Memorial Parkway or GWMP refers to the administrative unit of the NPS, whereas "the Parkway" or the George Washington Memorial Parkway refers to the actual roadway extending from Mount Vernon to the Capital Beltway.

In addition to determining the environmental consequences of the proposed action and the no action alternative, the NPS Management Policies (2006) and DO-12 require analysis of potential effects to determine whether actions would impair the park's resources. The Coastal Zone Management Act of 1972 (CZMA) requires an examination of impacts on coastal zone management and the balance of economic development with environmental conservation measures in a designated coastal zone. The CZMA Consistency Determination is included as Appendix C of this EA.

PROJECT AREA

Fort Hunt Park is located in Fairfax County, Virginia on the George Washington Memorial Parkway approximately 11.5 miles south of Washington, DC, 6 miles south of Old Town Alexandria, and 2.5 miles east of Mount Vernon Estate. Fort Hunt Park is a 157.4-acre park under the jurisdiction of the NPS. It is bounded by the Potomac River to the south and east and residential areas of Fort Hunt to the north and west (Figure 1). The park entrance is accessible via an exit ramp from the northbound and southbound lanes of the George Washington Memorial Parkway (the Parkway). The ramp forks into two directions: one leading to the entrance of Fort Hunt Park, the other continuing along Fort Hunt Road, a roadway along the north boundary of the park serving several residences.

Originally part of George Washington's Mount Vernon estate, the land that is Fort Hunt Park has undergone several transformations. Batteries at Fort Hunt defended the Potomac River during the Spanish-American War; the Civilian Conservation Corps operated a camp there during the Great Depression; and soldiers at Fort Hunt interrogated prisoners, trained pilots, and conducted intelligence operations during World War II. Today the park is a popular recreational and picnic area, and its surrounding forests serve as habitat for birds and other wildlife. The park provides a range of recreational opportunities that include bicycling, volleyball, softball, jogging, picnicking, and bird watching. Existing facilities at the park include five picnic areas, four pavilions, a loop road, nature trails, baseball fields, a playground, two volleyball courts, a maintenance yard, restrooms, and a U.S. Park Police station and paddocks. In addition, the property contains several historic structures including four gun batteries, a Battery Commander's Station, and the Non-Commissioned Officer's (NCO) Quarters from the Spanish-American War era (Figure 2).

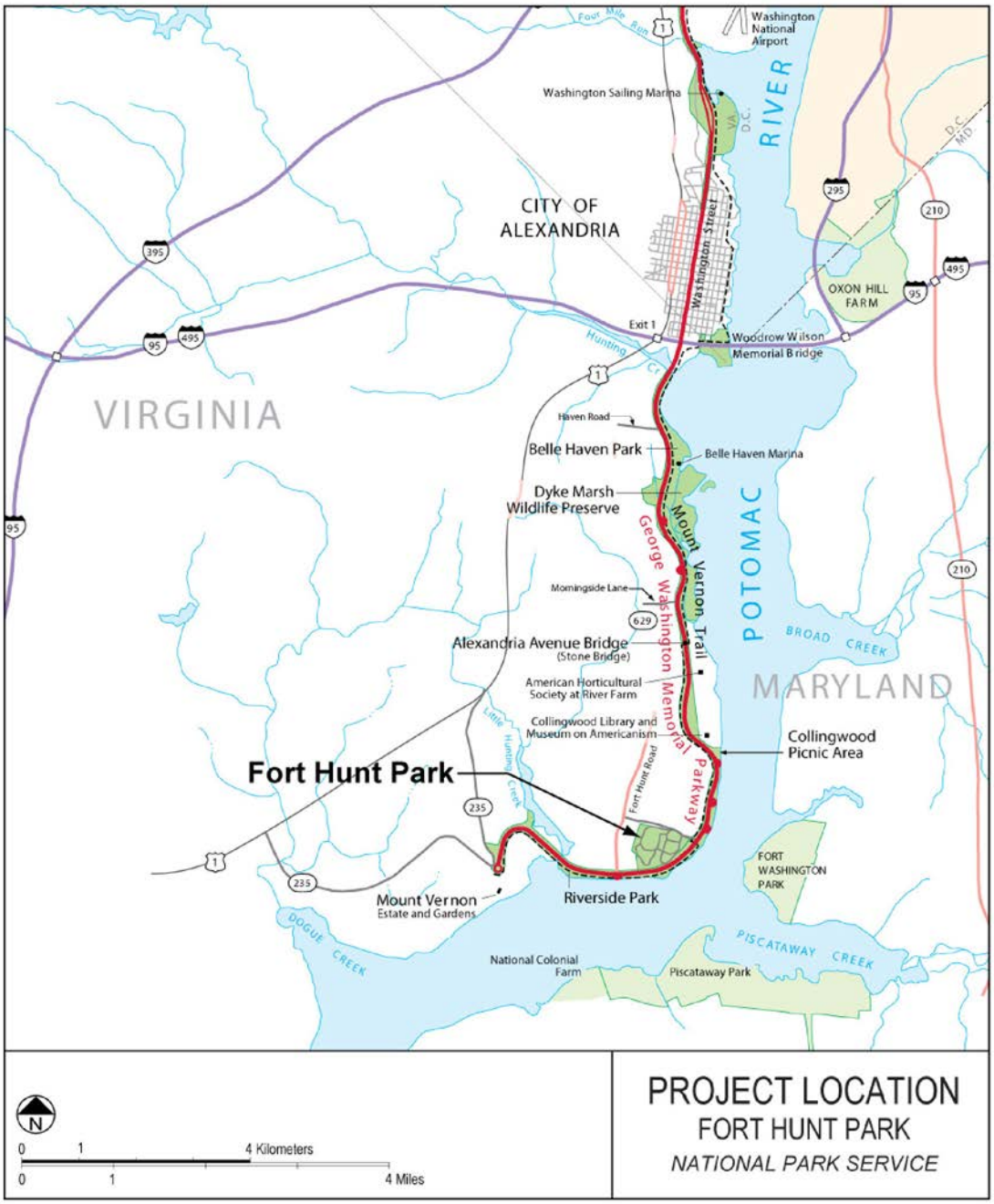

Figure 1. Project Location

Figure 2. Existing Conditions

PURPOSE AND NEED

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OBJECTIVES FOR THE PLAN

Objectives are "what must be achieved to a large degree for the action to be considered a success" (NPS DO-12) and represent more specific statements of purpose and need. All alternatives selected for detailed analysis must meet all objectives to a large degree and must resolve the purpose of and need for the action. The following objectives were identified by the planning team for this project:

- Provide enhanced interpretation that covers the various land uses/activities in Fort Hunt over time.
- Provide a place to introduce visitors to the park's history and orient them to the site.
- Maintain existing recreational opportunities (such as picnicking, organized games, hiking, cycling, and programmed activities) to the extent possible.
- Restore historic land use areas by removing modern facilities and exotic invasive vegetation.

The SDP/EA analysis seeks to provide the basis for future site development at Fort Hunt Park. The plan involves environmental effects over a broad time horizon and the detail of the impact analysis is fairly general in nature because individual project plans are not fully developed. The Fort Hunt SDP/EA does not eliminate the need for future site-specific environmental review for individual development proposals that are described in the SDP. The determination of the necessary level of additional NEPA and NHPA analysis would be made on a case-by-case basis at the time a site specific project is established.

GUIDANCE FOR THE PLANNING EFFORT

The following statements regarding the purpose and significance of George Washington Memorial Parkway and Fort Hunt Park were taken from the George Washington Memorial Parkway's Foundation for Planning and Management (2014).

PARK PURPOSE

The purpose statement for the George Washington Memorial Parkway was drafted through a careful analysis of its enabling legislation and the legislative history that influenced its development. The unit was established when the enabling legislation adopted by Congress was signed into law on May 29, 1930 (see Appendix D for enabling legislation and subsequent amendments). The purpose statement from the George Washington Memorial Parkway Foundation Document that follows lays the foundation for understanding what is most important about the park.

> *George Washington Memorial Parkway is a scenic roadway honoring the nation's first president, that protects and preserves cultural and natural resources along the Potomac River between Great Falls and Mount Vernon, and is part of a comprehensive system of parks, parkways, and recreational areas surrounding the nation's capital.*

PARK SIGNIFICANCE

George Washington Memorial Parkway was established by Congress on May 29, 1930, through Public Law 71-284, the Capper-Cramton Act. The parkway runs along the Potomac River through two states—Virginia and Maryland—as well as the District of Columbia, protecting the landscape and natural shoreline of the Potomac River while offering magnificent scenic vistas of Washington, D.C., and the Potomac Gorge. Along its route, the parkway also connects several important historic sites, memorials, and scenic and recreation areas in the Washington, D.C., metropolitan area.

The Capper-Cramton Act prescribed the construction of two parkways along the Potomac River. The Maryland section would be built from Fort Washington to the Great Falls and, on the Virginia side, from Mount Vernon Estate and Gardens to the Great Falls. In 1930, within the jurisdiction of the George Washington Memorial Parkway, the first segment of the parkway, the Mount Vernon Memorial Highway, was built from Mount Vernon to Arlington Memorial Bridge. The northern section, from Arlington Memorial Bridge to I-495, was completed in the 1960s.

Significance of George Washington Memorial Parkway

The following significance statements have been identified for the George Washington Memorial Parkway. Please note that the sequence of the statements do not reflect the level of significance.

- Mount Vernon Memorial Highway was the first comprehensively designed modern motorway built by the federal government. It is based on the idea of a landscaped, park-like roadway corridor that protected riverfront lands and today includes an extension north to the capital beltway, as well as Spout Run Parkway and Clara Barton Parkway.

- At the time of its construction between 1929 and 1932, Mount Vernon Memorial Highway pioneered many principles of roadway design that influenced federal roadway projects throughout the nation, such as limited access construction, grade-separated intersections, cloverleaf interchanges, and landscape design, many of which are still in use today.

- The 15-mile long Potomac Gorge, a large portion of which is managed by George Washington Memorial Parkway, is one of the most biologically diverse natural areas in the national park system.

- By protecting the natural shoreline of the Potomac River, the George Washington Memorial Parkway protects a defining feature of the nation's capital and provides opportunities to experience iconic scenic vistas of and from Washington, D.C., and the Potomac Gorge.

Stretching more than 25 miles, George Washington Memorial Parkway contains many discrete natural areas, historic sites, and memorials that are significant in their own right. Some of these places, including Fort Hunt Park, were part of the originally designated parkway while others have been added by Congress over the years or acquired under the authority of the Capper-Cramton Act of 1932.

Significance of Fort Hunt Park

Fort Hunt Park, along with Fort Washington Park, preserves the Endicott Period coastal defense gun batteries built to protect Washington, D.C., during the Spanish-American War. Both of these sites were active during the Spanish-American War era. In the 1930s, the Civilian Conservation Corps (CCC) NP-6 camp was stationed at the site, from which members carried out public works projects at the park and in the Washington area. Fort Hunt Park is also the site of P.O. Box 1142, one of the most important military intelligence operations centers during World War II.

Detailed history of the site upon which Fort Hunt Park sits is provided in Chapter 3 of this EA. The Director of Public Buildings and Public Parks of the National Capital assumed jurisdiction from the War Department in 1932 (Mackintosh 1996). From July 1942 to November 1946, the War Department repossessed the site. On June 30, 1948, Fort Hunt was acquired by the Department of the Interior (DOI).

Fort Hunt was listed in the National Register of Historic Places (NRHP) in March 1980, although the nomination included only thirteen acres of its total land, covering the extent of the remaining historic structures; the four gun batteries; the Battery Commander's Station; a single dwelling (the NCO's Quarters); and a stable (NPS 1980). Fort Hunt was listed in the NRHP under Criterion A for its association with events that have made a significant contribution to the broad patterns of our history. There are two periods of significance associated with the 1980 listing: 1882 through 1924 and 1933 through 1943.

APPLICABLE FEDERAL LAWS AND REGULATIONS

The following are laws, regulations, and management plans applicable to the proposed action that govern the federal agencies involved in this NEPA analysis.

National Environmental Policy Act, 1969, as amended

NEPA section 102(2)(c) requires that an environmental impact statement be prepared for proposed major federal actions that may significantly affect the quality of the human environment. NEPA was passed by Congress in 1969 and took effect on January 1, 1970. This legislation established this country's environmental policies, including the goal of achieving productive harmony between human beings and the physical environment for present and future generations. It provided the tools to implement these goals by requiring that every federal agency prepare an in-depth study of the impacts of "major federal actions having a significant effect on the environment" and alternatives to those actions. It also required that each agency make that information a part of its decisions. NEPA also requires that agencies make a diligent effort to involve the interested members of the public before they make decisions affecting the environment.

NEPA is implemented through regulations of the Council on Environmental Quality (CEQ), effective 1978 (40 CFR 1500 – 1508). The NPS has in turn adopted procedures to comply with the act and the CEQ regulations, as found in DO-12: Conservation Planning, Environmental Impact Analysis, and Decision-making (NPS 2001), and its accompanying handbook.

NPS Organic Act of 1916

By enacting the Organic Act, Congress directed the U.S. Department of the Interior and the NPS to manage units "to conserve the scenery and the natural and historic objects and wild life 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). Despite these congressional mandates, the Organic Act and its amendments afford the NPS latitude when making resource decisions. Because conservation remains predominant, the NPS seeks to avoid or to minimize adverse impacts on park resources and values. However, the Organic Act does give the Secretary of the Interior discretion to provide "for the destruction of such animal and of such plant life as may be detrimental to the use of any of said parks, monuments, or reservations" (16 USC 3).

Redwood National Park Expansion Act of 1978, as amended

All NPS units are to be managed and protected as parks, whether established as a recreation area, historic site, or any other designation. This act states that the NPS must conduct its actions in a manner to ensure no "derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress." (PL 95-250, USC Sec 1a-1).

National Parks Omnibus Management Act of 1998

National Parks Omnibus Management Act of 1998 (16 USC 5901 et seq.) directs the NPS to obtain scientific and technical information for analysis. The NPS handbook for DO-12 states that if, "such information cannot be obtained due to excessive cost or technical impossibility, the proposed alternative for decision will be

modified to eliminate the action causing the unknown or uncertain impact or other alternatives will be selected" (Section 4.4).

Americans with Disabilities and Architectural Barriers Act Guidelines

Pursuant to the Americans with Disabilities Act of 1990 (ADA) and the Architectural Barriers Act of 1968 (ABA), all public buildings, structures, and facilities must comply with specific requirements related to architectural standards, policies, practices, and procedures that accommodate people with hearing, vision, or other disability, and other access requirements. Public facilities and places must remove barriers in existing buildings and landscapes, as necessary and where appropriate. The NPS must comply with the Architectural Barriers Act Accessibility Standard (ABAAS), as well as ADA standards for this project.

Endangered Species Act of 1973 (16 U.S.C. 1531-1544, 87 Stat. 884), as Amended

This act requires all federal agencies to consult with the Secretary of the Interior on all projects and proposals having potential impact on federally endangered and threatened plants and animals. NPS policy also requires examination of the impacts on federal candidate species, as well as state-listed threatened, endangered candidate, rare, declining, and sensitive species. Section 7 of the Endangered Species Act requires federal agencies, through consultation with U.S. Fish and Wildlife Service (USFWS), to insure that any action authorized, funded, or carried out by them is not likely to jeopardize the continued existence of listed species or modify their critical habitat.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act, passed in 1940 and amended in 1972, provides for the protection of the bald eagle and the golden eagle (USFWS 2010b). The act prohibits the take; possession; sale; purchase; barter; offer to sell, purchase, or barter; transport; export; or import of any bald eagle or golden eagle part, nest, or egg unless allowed by permit. To take an eagle includes pursuit, to shoot or shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb.

Migratory Bird Treaty Act of 1918

The Migratory Bird Treaty Act (MBTA) of 1918 implemented the 1916 convention between the United States and Great Britain for the protection of birds migrating between the U.S. and Canada. Similar conventions between the United States and Mexico (1936), Japan (1972), and the Union of Soviet Socialist Republics (1976) further expanded the scope of international protection of migratory birds. Each new treaty has been incorporated into the MBTA as an amendment and the provisions of the new treaty are implemented domestically. These four treaties and their enabling legislation, the MBTA, established federal responsibilities for the protection of nearly all species of birds and their eggs and nests.

Clean Air Act of 1970, as amended

The Clean Air Act was enacted to regulate and reduce air pollution from area, stationary, and mobile sources and to protect the nation's air resources and public health. Under the Clean Air Act, the U.S. Environmental Protection Agency (EPA) must provide health-based air quality standards against a variety of pollutants, such as ozone, carbon monoxide, particulate matter, lead, nitrogen oxides, and sulfur dioxides. National parks are

designated as Class I air quality areas, meaning that they are allowed the smallest incremental pollution increases above baseline concentrations.

Clean Water Act (Section 404). 33 U.S.C. §1251 et seq. (1972)

Section 404 of the Clean Water Act (CWA) established a program to regulate the discharge of dredged and fill material into waters of the United States, including wetlands. Activities regulated under this program include fills for development, water resource projects (e.g., dams and levees), infrastructure development (e.g., highways and airports), and conversion of wetlands to uplands for farming and forestry.

National Historic Preservation Act of 1966, as Amended

Section 106 of the National Historic Preservation Act requires federal agencies to consider the effects of their undertakings on properties listed, or potentially eligible for listing, on the NHRP. All actions affecting the park's cultural resources must comply with this law, which is implemented through 36 CFR 800.

Archeological Resources Protection Act, 1979

The Archeological Resources Protection Act (ARPA) was enacted in order to preserve the archeological resources that are key to the history of America. Archeological resources must be protected because they are accessible on public lands, they are commercially valuable, and existing federal laws do not adequately protect them. The ARPA describes the requirements that must be met before federal authorities can issue a permit to excavate or remove any archeological resource on federal or Indian lands; the curation requirements of artifacts, other materials excavated or removed, and the records related to the artifacts and materials; and authorizes the Secretary of the Interior to issue regulations describing in more detail the requirements regarding these collections.

Coastal Zone Management Act of 1972

The Coastal Zone Management Act (CZMA) of 1972 is administered by the National Oceanic and Atmospheric Administration's (NOAA) Office of Ocean and Coastal Resource Management. CZMA provides for management of coastal resources and "balances economic development with environmental conservation" (NOAA 2007). The National Coastal Zone Management Program is outlined in CZMA (See Virginia Coastal Zone Management Program in Chapter 5).

Energy Independence and Security Act of 2007

Enacted in 2007, the stated purpose of the Energy Independence and Security Act of 2007 (EISA) is "to move the United States toward greater energy independence and security, to increase the production of clean renewable fuels, to protect consumers, to increase the efficiency of products, buildings, and vehicles, to promote research on and deploy greenhouse gas capture and storage options, and to improve the energy performance of the Federal Government, and for other purposes." Under Section 438 of EISA, federal agencies are required to reduce stormwater runoff from federal development and redevelopment projects to pre-development levels in order to protect water resources. These stormwater requirements are addressed in this EA.

EXECUTIVE ORDERS AND DIRECTOR'S ORDERS

Executive Order 11593, Protection and Enhancement of the Cultural Environment

Executive Order 11593 directs the NPS to support the preservation of cultural properties and to identify and nominate to the NRHP cultural properties within the park, and to "exercise caution . . . to assure that any NPS-owned property that might qualify for nomination is not inadvertently transferred, sold, demolished, or substantially altered."

Executive Order 11988, Floodplain Management

Executive Order 11988 directs the NPS to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative. The NPS complies with this Executive Order through the guidance outlined in Director's Order 77-2: Floodplain Management.

Executive Order 11990, Protection of Wetlands

Executive Order 11990 directs the NPS to avoid, to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands wherever there is a practicable alternative. The NPS complies with this Executive Order through the guidance outlined in Director's Order 77-1: Wetland Protection.

Executive Order 13112: Invasive Species

Executive Order 13112 addresses the prevention of the introduction of invasive species and provides for their control and minimization of the economic, ecological, and human health impacts that invasive species causes. This EA includes analysis of invasive species in its cultural landscape analysis.

Executive Order 13508, Chesapeake Bay Protection and Restoration

Executive Order 13508, Chesapeake Bay Protection and Restoration, calls on the federal government to lead the effort to restore the health of the Chesapeake Bay. The executive order's goal is to protect and restore the health, heritage, natural resources, and social and economic value of the Nation's largest estuarine ecosystem and the natural sustainability of its watershed. Restoring the health of the Chesapeake Bay will require controlling pollution from all sources as well as a number of conservation and restoration measures. The pollutants largely responsible for pollution of the Chesapeake Bay are nutrients from a variety of sources, such as sewage treatment plants, city streets, development sites, agricultural operations, and deposition from the air onto the waters of the Chesapeake Bay and the lands of the watershed. Executive Order 13508 includes a number of goals aimed at restoring the Chesapeake Bay. Most relevant to Fort Hunt Park is the goal to strengthen storm water management practices at Federal facilities and on Federal lands within the Chesapeake Bay watershed.

Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance

Executive Order 13514 sets sustainability goals for federal agencies and focuses on making improvements in their environmental, energy, and economic performance. It expands on the Energy Policy Act of 2005, the Energy Independence and Security Act of 2007 (EISA), and Executive Order 13423 by requiring federal

agencies to implement strategies that measure, manage, and reduce greenhouse gas emissions, water consumption, and diversion of materials. The order mandates that federal agencies meet various energy and environmental targets, and defines requirements for sustainability in buildings and leases, sustainable acquisition, and electronic stewardship.

Under Section 438 of the EISA, federal agencies are required to reduce stormwater runoff from federal development and redevelopment projects to predevelopment levels in order to protect water resources. EO 13514 provides guidance on the implementation of Section 438 and directs the U.S. EPA to issue guidance on Section 438 of the EISA, establishing new stormwater design requirements for federal construction projects that disturb a footprint greater than 5,000 square feet of land.

Executive Order 13690, Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input

Executive Order 13690 amends Executive Order 11988 and furthers the President's Climate Action Plan of 2013, which directs federal agencies to take appropriate actions to reduce risk to federal investments and update their flood-risk reduction standards. This Executive Order provides three approaches that federal agencies can use to establish the flood elevation and hazard area for all actions potentially occurring in and/or affecting floodplains: a climate informed science approach; adding two to three feet of elevation to the 100-year floodplain; or using the 500-year floodplain. In addition, an agency implementing a proposed action in a floodplain must make public its intent to do so, justify its reason(s) for locating the proposed action in a floodplain, and provide ample lead time for meaningful public input (FEMA 2015).

Draft implementing guidelines prepared by the Federal Emergency Management Agency (FEMA) for Executive Order 13690 underwent public review ending on May 6, 2015. Federal agencies will issue new or amend existing guidelines once the Water Resources Council has issued final revised guidelines following the public review period (FEMA 2015).

Director's Order 12 (DO-12): Conservation Planning, Environmental Impact Analysis, and Decision-making

DO-12 (NPS 2001) directs the way that the NPS complies with NEPA, including all aspects of environmental analysis, public involvement, and resource-based decisions. NPS must follow all sources of NEPA guidance, including but not limited to, 40 CFR 1500-1508 and 516 Department Manual. DO-12 and its technical manual outline the responsibilities of the parties accountable for ensuring compliance with NEPA, from the director to project managers and contracting officers.

Director's Order 28 (DO-28): Cultural Resource Management

DO-28 (NPS 1998a) directs the NPS to protect and manage cultural resources in its custody through effective research, planning, and stewardship in accordance with the policies and principals contained in the NPS Management Policies (2006). This Director's Order is carried out through NPS 28, Cultural Resource Management Guidelines, which provides the fundamental concepts of cultural resource management for the NPS. The cultural resource management guidelines address cultural landscapes stating "preservation practices [should be implemented] to enable long-term preservation of a resource's historic features, qualities, and materials [of a cultural landscape]" (NPS 2006).

Director's Order 28A (DO-28A): Archeology

DO-28A supplements DO-28: Cultural Resources Management Guidelines, providing guidance to park managers and staff regarding archeological programs. This order also details archeological program requirements within NPS units and all applicable standards and guidelines (NPS 1998b).

Director's Order 77: Natural Resources Management Guideline (1991)

DO-77 (NPS 1991) provides guidance on implementing laws and regulations relevant to natural resources to park managers for all planned and ongoing natural resource management activities. Managers must follow all federal laws, regulations, and policies. This document provides the guidance for park management to design, implement, and evaluate a comprehensive natural resource management program in accordance with relevant laws.

NPS MANAGEMENT POLICIES

The NPS Management Policies (2006) is the basic NPS-wide policy document, adherence to which is mandatory unless specifically waived or modified by the NPS director or certain departmental officials, including the Secretary of the Interior. Actions under this EA are in part guided by these management policies. Sections that are particularly relevant to this project are as follows:

Section 4.1.3 – Evaluating Impacts on Natural Resources

The NPS will ensure that the environmental costs and benefits of proposed actions are fully and openly evaluated before implementing actions that may impact the natural resources of parks. The process of evaluation must include public engagement; the analysis of scientific and technical information in the planning, evaluation, and decision-making processes; the involvement of interdisciplinary teams; and the full incorporation of mitigation measures and other principles of sustainable park management (NPS 2006).

Section 5.3.1 – Protection and Preservation of Cultural Resources

The NPS will endeavor to protect cultural resources against overuse, deterioration, environmental impacts, and other threats without compromising the integrity of cultural resources (NPS 2006).

Section 8.2.1 – Visitor Carrying Capacity

The NPS will identify visitor carrying capacities for managing public use and will identify ways to monitor and address unacceptable impacts on park resources and visitor experiences (NPS 2006).

Section 8.2.2 – Recreational Activities

The NPS will allow a variety of recreational uses and will monitor these visitor uses to determine their appropriateness for the specific park unit as well as the level of impairment to park resources (NPS 2006.

Section 8.2.4 – Accessibility for Persons with Disabilities

The NPS will make all reasonable efforts to make NPS facilities, programs, and services accessible to and usable by all people, including those with disabilities. The NPS will comply with the ABA of 1968, the Rehabilitation Act of 1973, and section 507 of the ADA (NPS 2006).

PROJECT BACKGROUND

Public feedback has been critical to guide this planning process and in developing the alternatives presented in this renewed SDP/EA, and aligning the NPS vision for Fort Hunt with a range of issues raised to ensure its protection as a valuable amenity for the local and regional community while enhancing visitor services that improve education of its nationally significant resources to a much wider audience.

The Fort Hunt Park SDP/EA was originally initiated in late 2010, with public scoping conducted in early 2011, and the release of an EA in September 2011. Based on comments received on the EA during public review, GWMP determined that none of the previously considered alternatives were viable and new alternatives would be developed.

In June 2012, GWMP solicited public comment on new alternative concepts to reflect public comment received during the September 2011 EA review. The alternatives in this EA respond to public feedback on concepts presented in 2012, as well as additional NPS analysis since that time. Alternative 4 builds off of Alternative Concept 4; the removal/realignment option common to all action alternatives and Alternative 5 have been added in response to substantive public comments received. The following sections provide more detailed background on the public involvement process over the full project timeline.

2010 Initiation and 2011 Public Scoping

This project was initiated in late 2010, with public scoping conducted in early 2011. In addition to internal and agency scoping, public scoping for the Fort Hunt SDP EA began on January 10, 2011 and concluded on March 11, 2011. A public scoping meeting was initially scheduled for January 27, 2011; however, this meeting was cancelled due to inclement weather. The public scoping meeting was rescheduled and held on February 24, 2011, at the Martha Washington Library, 6614 Fort Hunt Road, Alexandria, Virginia. Notice of the public meetings and the rescheduled date were posted on the Planning, Environment, and Public Comment website (PEPC). In addition, the NPS sent notices of the meeting and rescheduled date to individuals and organizations, including park neighbors and WWII veterans of P.O. Box 1142, which was a secret American military intelligence facility that operated at the site where Fort Hunt Park is now located. The purpose of this meeting was to solicit public input on the purpose, need, and objectives of the project; major issues; and potential alternatives. A total of 33 people signed in as they entered the meeting facility. The majority of individuals who signed in at the meeting had addresses adjacent to Fort Hunt Park.

During the 60-day public scoping period, 65 pieces of correspondence from six states were received. Individuals living within the vicinity of the project area (Virginia) submitted approximately 88 percent of those correspondence pieces. The majority of Virginia residents lived adjacent to or nearby Fort Hunt Park. Comments were also provided by the Fairfax County Park Authority, the National Parks Conservation Association, Friends of Dyke Marsh, and WWII veterans. Public scoping respondents provided a number of specific considerations and concerns summarized below:

- Construction of a visitor contact station along with improved interpretation of the park's history was supported by the majority of respondents. Many indicated that a small- to moderate-sized building requiring no additional parking would be desirable. Some provided suggestions for visitor contact station locations. Of these, the majority preferred a visitor contact station located near the park

entrance. Some suggested that the NCO Quarters be repurposed as a museum/visitor contact station.

- A number of respondents were interested in the continuation of the park's recreational activities. A small minority of respondents was opposed to the construction of a visitor contact station and would prefer to see the park maintain all of the current recreational areas. Some were concerned that a visitor contact station would detract from the park's recreational uses. Additional recreational opportunities were suggested to include more ballfields, improved playground equipment, and the continuation of the summer concert series.
- Vehicular circulation and access were also commented upon by some respondents. Respondents overwhelmingly agreed that there should be no new entrances to the park. Many requested that the closed loop road in Area D remain closed to traffic.
- Natural resources were also a concern for several respondents. Some stated that they would prefer only dead or injured trees be removed. There was some concern that actions at the park may impact the bald eagle nest. Other concerns included stormwater management and management of invasive species. In general, respondents asked that the NPS minimize impacts to the natural environment.
- Several respondents stressed the importance of preserving the park's historic structures. In addition to the visitor contact station, respondents would also like to see interpretation through the use of new historical markers throughout the park. There were a few suggestions for volunteers to assist with interpretive activities, running a museum, and with planning efforts.
- Regarding park maintenance and operations, it was suggested the U.S. Park Police station and the maintenance facility should remain in their current locations. Some expressed concern regarding vehicles exceeding the speed limit on Fort Hunt Road and within the park. There were suggestions to provide speed controls and/or more enforcement. There were also several respondents who suggested increased park security.

Along with the purpose and need for the proposed action, these considerations and concerns guided the development of alternatives and contributed to the selection of impact topics as identified in the 2011 EA.

The NPS considered the public comments during the 2011 value analysis study conducted to compare the potential options for the SDP. The study looked at potential designs, costs, and resource constraints for a number of options and the resulting report documented the value analysis process that weighed these various options. The options that scored the highest were carried forward and developed into the full alternatives to be analyzed in the 2011 EA. The value analysis also helped the NPS choose a preferred alternative.

2011 EA

Following the value analysis study, the EA was completed and released for public review in September 2011. This EA analyzed the potential impacts of three action alternatives and a No-Action Alternative on the natural, cultural, and human environment. The alternatives presented can be summarized as follows:

- **Alternative A – No Action**
- **Alternative B**
    - Visitor facility constructed in Area B
    - Picnic Pavilion B, C and D removed

  - Maintains most vehicular circulation amongst action alternatives
  - Net decrease of approximately 4,300 square feet of pavement
  - Chronological interpretive trail system added
  - Includes bicycle/pedestrian lane around loop access road

- **Alternative C**
  - Visitor facility constructed in Area C
  - Picnic Pavilion B, C and D removed
  - Most reduced vehicular circulation amongst action alternatives
  - Net decrease of approximately 56,700 square feet of pavement
  - Chronological interpretive trail system added
  - Includes dedicated bicycle/pedestrian loop trail

- **Alternative D**
  - Visitor facility constructed in Area B
  - Picnic Pavilions A, B, and D removed
  - Moderate reduction of vehicular circulation
  - Includes dedicated bicycle/pedestrian trail
  - Net decrease of approximately 5,500 square feet of pavement

A public meeting was held on September 21, 2011 at Fort Hunt Park in the Area A pavilion with a strong turnout from the local community. While it was difficult to record a total number given the venue, 56 individuals signed-in as they entered the pavilion. The majority of individuals who signed in at the meeting provided mailing addresses adjacent to Fort Hunt Park.

Public comment was open for 60 days between September 6, 2011 and November 5, 2011 with one-hundred and seventy-four (174) pieces of correspondence from 5 states and 2 countries were received during the public comment period. Individuals living within the vicinity of the project area (Virginia) submitted approximately 154 (approximately 88%) of those correspondence pieces. The majority of Virginia residents provided mailing addresses adjacent to Fort Hunt Park and several comments were received from the Potomac Valley/Riverbend Civic Association which borders the park to the west. Comments were also provided by the Circulo de Puerto Rico, Fort Hunt Elementary PTA President, National Parks Conservation Association, Virginia, Friends of Dyke Marsh, and World War II Veterans. Comments were provided by citizens associated with the Mount Vernon Council of Citizens' Associations, Collingwood Citizens Association, Community Association of Hollin Hills, Mount Vernon Manor Citizens Association, Stratford on the Potomac Community Association, and Waynewood Citizens Association.

The majority of public comments received on the EA centered on the alternatives. While there was some public support, strong concern from local park users and neighbors focused on issues with the alternatives. The local community pressed for less expensive and disruptive ways to enhance interpretation at the site with minimal alterations to existing recreational amenities valued by the public. Commenters cited support for the no action alternative and to consider management solutions, such as restructuring the existing permitting system for picnicking at the park, that would avoid need to remove picnic pavilions. Two primary

reasons for supporting the no action alternative were the imprudent use of government funding and removal of functional facilities that are currently used by the public.

Agencies weighed in as well, with the Virginia Department of Environmental Quality (VDEQ) providing a summary of agency comments that offered general support to the plans. The Virginia Department of Transportation (VDOT) and Fairfax County raised concerns about the lack of detailed analysis or traffic projections regarding future use of the park and potential increases in park visitation. The Virginia Department of Historic Resources (VDHR) concurred with the finding of No Historic Properties Affected and the approach that each individual project proposal would be sent to VDHR for review in accordance with the Section 106 of the NHPA.

Based on the issues highlighted through the public review, GWMP determined that none of the alternatives presented in the 2011 EA would move forward as originally proposed. The decision was made to complete a new Environmental Assessment that would look at additional alternatives, with further analysis and a reinitiated public scoping to be completed by GWMP staff.

Renewed Public Scoping in 2012

In June 2012, GWMP presented and asked for public comment on new alternative concepts to reflect public comment received during the September 2011 EA review. The public review period was open for 45 days, between June 13, 2012 and July 28, 2012. Three alternative concepts were presented, including two concepts based on previous alternatives and one new concept. A core goal of the renewed public scoping for the project was to enhance education of Fort Hunt's rich history in a way that is compatible with current visitor use and recreational facilities. This responded to issues brought forth by the public in 2011 relating to the importance of the park's recreational resources, particularly the picnic pavilions.

A public meeting was held on June 27, 2012 in the cafeteria of the Fort Hunt Elementary School, located less than a half mile from Fort Hunt Park at 8832 Linton Lane, Alexandria, VA. The meeting was well attended with another strong local turnout, with 67 individuals that signed-in. Representatives from the National Park Conservation Association (NPCA) and the friends group were in attendance, sharing information regarding Fort Hunt's rich history. The meeting was held in an open house format with an interdisciplinary team of NPS staff on-hand to discuss the project and answer questions. A short presentation was given overviewing the project and updated alternative concepts, introduced by Fairfax County Board of Supervisors Mount Vernon District representative Gerry Hyland. At the request of those in attendance, the presentation was followed by a group question and answer period. The remainder of the meeting was an open house with opportunities for one-on-one discussions between park staff and the public.

A substantial amount of public response was received in the renewed public scoping effort with a more positive overall reception to concepts proposed than to the 2011 EA. A total of 126 public correspondences were received from six states and one from the United Kingdom. A similar proportion of response was from the local community as previous comment periods with over 65 percent of correspondence pieces from the Alexandria, VA area and over 90 percent from the Washington, DC metropolitan area. Comments were also provided by local Boy Scout troops and sports teams, Fairfax County Board of Supervisors Mount Vernon District office, Holocaust Memorial Center Zekelman Family Campus, Jewish Historical Society of Greater Washington, Friends of Camp Richie, ACLU Northern Virginia Chapter, National Parks Conservation

Association, Friends of Dyke Marsh, and World War II Veterans. Comments were also provided by citizens associated with the Potomac Valley - River Bend Civic Association, Mount Vernon Civic Association.

Of the comments received, several areas of concern emerged, including:

- General support for additional interpretation of park's historic significance, including trail and visitor contact station but concern that concepts as presented would be disruptive to existing uses
- Opposition to removal of any picnic facilities or ballfields due to their importance to the local community and many regional users
- Request for more justification given for actions, particularly with respect to potential costs incurred
- Suggestions to look into options for historic interpretation that utilize new technology and do not require construction of a new building or significant changes to existing park uses; suggestion to adapt historic Non-Commissioned Officer's (NCO) Quarters for use as visitor contact station
- Suggestions to prioritize improved management and maintenance of existing facilities before considering new construction, including better management/enforcement of current picnic permits and need to update facilities such as the playground in Area A
- Opposition to reopening the closed lower road due to safety/security concerns as well as potential impacts to existing recreational use; suggestion to consider realigning loop road to avoid Historic Land Use Restoration Area
- Various comments reflected concern regarding current traffic issues at the park and even greater concern over potential impacts to traffic due to the proposed alternatives. Particular issues related to the additional traffic that establishing a visitor contact station could bring to the park, and existing users not wanting to lose a valued resource of the road for pedestrian, dog walking and bicycle use.
- Support of the no action alternative, including concerns over financial implications of alternative concepts and suggestions to explore new options to enhance historic interpretation without reducing existing visitor uses
- Concern that siting of visitor contact station in Area A or B would affect use of two most heavily used picnic pavilions by potentially creating user conflicts and parking issues
- Support for locating visitor contact station in Area C, noting that it would impact a smaller capacity picnic pavilion and ensure less conflict of park use
- Safety/security concerns relating to proposed new restroom in lower section of Area E
- General support for restoring historic sight line from a battery to the Potomac River assuming minimal impacts to vegetation/wildlife habitat
- Development of site should be sensitive to potential adverse impacts to the natural environment (bald eagle habitat and forest cover referenced) - particularly in siting of visitor center and potential increases in park visitation

There was overwhelming support for enhancements to interpretation of the site's history, with a continued focus on what minimal additions could be made without the need to reduce the range of other existing uses of the park. Proponents to a visitor contact station suggested benefits to locating a facility closer to the park entrance, including several suggestions to utilize existing structures such as the NCO Quarters; and with strong support for a contact station in Area C should a location near the entrance not be possible.

While in favor of retaining a loop road configuration, the local community strongly opposed reopening the closed lower road, citing various safety/security issues that led to its original closure as well as the recreational value as it is today. The suggestion was made to explore the option of realigning the existing loop road to the north of the land use restoration area near Area C, similar to how it had been proposed for Area D.

Revised Alternative Concepts Public Review in 2015

In response to comments received during the earlier scoping processes, NPS revised the alternatives to reflect the public input. The alternative concepts public review period for the SDP began on February 2, 2015, and extended through March 4, 2015. Notice for the comment period and meeting was sent via e-blast and the posted on NPS Planning, Environment, and Public Comment (PEPC) website. Materials posted on the PEPC website included boards and a video presented at the public meeting, as well as the scoping announcement and press release.

A public scoping meeting was held on February 5, 2015 from 6:30 to 8:30 p.m. at Martha Washington Public Library, located at 6614 Fort Hunt Road in Alexandria, Virginia. A press release was sent to local publications. It is estimated that approximately 80 people attended the meeting, with 56 attendees registering on the sign-in sheet.

The scoping meeting was conducted using an open-house format. Attendees could circulate throughout the room to speak to NPS and consultant representatives to address specific issues, as well as review the alternatives. A brief video outlining the project ran on a loop, providing attendees with the opportunity for an overview of the project.

The comments received during the scoping period are summarized below:

- Comments expressed support or a preference for the No Action Alternative, stating that the park does not need major new facilities such as a visitor center.
- Some commenters expressed support or a preference for Alternative Concept 4, citing the large visitor services zone and location in Area C, and fewer parking conflicts with Pavilion A.
- Other commenters expressed support or a preference for Alternative Concept 5, citing the use and preservation of current resources and historical structures, along with the location near the entrance to the park and away from picnic Area C.
- Commenters noted that either Alternative 4 or Alternative 5 would be suitable to meet the needs of the community, park users, and historic preservation needs.
- Objections were raised to the use of current office space in Pavilion A and the NCO on the grounds that they do not provide adequate space for an interpretive center of the size needed to interpret the park's resources and host the World War II archives and artifacts. In addition, Alternative 5 is located near Pavilion A, which regularly hosts large picnics.
- A number of commenters expressed support for the establishment of an interpretive/visitor facility within Fort Hunt.

- Commenters emphasized that the park's history needs to be more prominently interpreted.
- Commenters expressed opposition to the removal or reduction of existing park facilities, including restrooms, parking, picnic areas, and ballfields.
- Commenters expressed support for the playground improvements included in the plans, noting the playground is in poor condition.
- Commenters expressed support for the continued closure of Lower Loop Road to vehicular traffic, with some also referencing including a fitness trail. In contrast, comments included opposition to establishing a fitness trail, noting it would be underutilized and is unneeded.
- Commenters expressed concern regarding the removal of trees to re-establish the sight line between the Potomac River and Battery Robinson, stating it could create negative impacts on natural resources.
- Comments received expressed both support for, and opposition to, the interpretive trail. Those in opposition felt the trail is unnecessary as visitors can already walk between sites.
- Comments in support of and in opposition to the realignment of Loop Road and the repurposing of the ballfield into a multi-purpose space were received.
- Commenters expressed concern that bald eagle habitat and other natural resources could be disturbed due to construction activities and alternative elements such as the Potomac River sight line.

After careful analysis of public comment and additional investigations of potential resource impacts, key revisions in this EA to the alternative concepts presented in June 2012 include the following:

- Alternative Concept 2 dismissed due to public concern over conflicts with visitor use of Area A Picnic Pavilion
- Alternative Concept 3 dismissed due to public concern over conflicts with visitor use of Area B Picnic Pavilion/ballfield and impacts to the more open landscape of that portion of the park
- Opening lower road dismissed due to public concern over possible security issues, support for existing recreational use for pedestrians and bicycles and NPS concern over tree loss that would be associated with bringing roadway back to safety standards
- New alternative added to assess conversion of historic NCO Quarters for use as visitor contact station
- All concepts maintain existing loop road configuration with the option for limited road removal/realignment, as well as removal of Area E Restrooms and Parking Area, now evaluated as an option.
- Restoring sight line from Battery Sater no longer under consideration due to projected amount of tree loss that would be required

The revisions included in this EA serve as the NPS response to public comments and concern statements, as detailed above.

PREVIOUS AND RELATED PLANNING STUDIES

Other previous and related planning studies that contributed to the development of alternatives include the Fairfax County Comprehensive Plan 2011, Fairfax Forward, Little Hunting Creek Watershed Management Plan, Fort Hunt Batteries Conditions and Treatment Plan, GWMP Long-Range Interpretive Plan and Fort Hunt Park Site Development Plan Value Analysis 2011. The following summarizes how the project would meet the goals and objectives of these plans and policies:

Fairfax County Comprehensive Plan – Mount Vernon Area Plan, Fort Hunt Sector

The Fairfax County Comprehensive Plan (Fairfax County, 2011a) provided recommendations for land use, transportation, housing, the environment, heritage resources, public facilities and parks and recreation for different areas of the County. Fort Hunt Park lies within the Mount Vernon Area Plan Fort Hunt Planning Sector. The Fort Hunt Park SDP is consistent with area plans goals and objective, which identified trails and open space as desired features in this area. Resource protection is consistent with the environment sections of the area plan and the SDP would have no effect on land use, transportation, housing, heritage resources or public facilities aspects of the plan. As detailed below, Fairfax Forward has now replaced the Area Plans Review process, so the next update will follow the new process.

Fairfax Forward

Adopted in July 2013, Fairfax Forward is Fairfax County's new approach to Comprehensive Plan review and community engagement (Fairfax County, 2013). Fairfax Forward is new means to review and manage the Comprehensive Plan, as a replacement for the previous Area Plans Review process. Fairfax Forward is planned to be implemented as a pilot program during the next two years. Afterwards, the board and Planning Commission will evaluate the program's effectiveness and efficiency. State law requires that the Comprehensive Plan be reviewed at least once every five years. Fairfax Forward meets this legal requirement and establishes an ongoing review process. Upcoming amendments to Fairfax Forward with relevance to Fort Hunt Park include an update to Tidal Shoreline Erosion Control and a countywide Bicycle Master Plan.

Little Hunting Creek Watershed Management Plan

The Management Plan strives to improve and maintain watershed functions including water quality, habitat, and hydrology; reduce stormwater impacts to protect human health and safety; and involve stakeholders in protection, maintenance, and restoration of the watershed. The plan includes a recommendation to construct new wetlands at various points along the Parkway near the Potomac River, including an area adjacent to Fort Hunt Park, south of the Parkway, on the west side of the unnamed tributary flowing from Fort Hunt to the Potomac River (Fairfax County 2004).

Fort Hunt Batteries Conditions Assessment and Treatment Plan

The purpose of this investigation was to assess the existing conditions and develop appropriate treatments for the stabilization of the four batteries and the battery command station at Fort Hunt Park. The primary objective of the conditions assessment is to identify any unsafe or unsecure conditions associated with these structures. (NPS, 2002b)

George Washington Memorial Parkway Long-Range Interpretive Plan

The GWMP Long-Range Interpretive Plan provides general direction for interpretation of the many NPS sites that GWMP administers, including Fort Hunt Park. The GWMP Long-Range Interpretive Plan describes the purpose of Fort Hunt Park is to preserve and interpret the historical and natural resources and history of Fort Hunt (NPS 2005). The Long-Range Interpretive Plan describes different interpretive themes, defines visitor experience goals, and provides program and media recommendations for Fort Hunt. The Fort Hunt section (pages 76-80) of the Long-Range Interpretive Plan is provided in Appendix D.

FUTURE COMPLIANCE AND PERMITS

Chesapeake Bay Preservation Ordinance

Fairfax County's Chesapeake Bay Preservation Ordinance regulates development in Resource Protection Areas (RPAs). RPAs are defined as tidal wetlands; tidal shores; water bodies with perennial flow; nontidal wetlands connected by surface flow to a tidal wetland or water body with perennial flow; and areas that include any land within a major floodplain or any land within 100 feet of the previously-described features. Functional RPAs filter pollutants and sediments from, and reduce the velocity of, stormwater runoff; reduce stream bank erosion; and provide habitat for wildlife. With limited exceptions, most types of construction and vegetation disturbance are prohibited in RPAs under the ordinance (Fairfax County 2005). RPAs are discussed in addition detail below; see *Impact Topics Dismissed from Further Analysis*.

Erosion and Sediment Control Program

Fairfax County's Erosion and Sediment Control Law requires the preparation of an erosion and sediment control plan for land-disturbing projects exceeding 2,500 square feet. The general contractor must implement erosion and sediment control measures on the project site in accordance with the erosion and sediment control plan to minimize the effects of soil erosion from wind and water. During construction, the project is subject to inspection and enforcement to ensure that the erosion and sediment control plan is being properly implemented and maintained (Fairfax County 2015).

Virginia Stormwater Management Program

The Virginia Stormwater Management Program is administered by VDEQ and requires construction activities disturbing one or more acres of land to obtain coverage under the General Permit for Discharges of Stormwater from Construction Activities (Construction General Permit). Prior to obtaining coverage under the Construction General Permit, the project proponent must prepare a Stormwater Pollution Prevention Plan (SWPPP) outlining the steps and techniques the proponent will use to reduce pollutants in stormwater runoff from the project site. Fairfax County is authorized to issue Construction General Permits on behalf of VDEQ (VDEQ 2015a).

Stormwater generated within and discharged from Fort Hunt Park is regulated under the Virginia Pollutant Discharge Elimination System (VPDES) Phase II Municipal Separate Storm Sewer System (MS4) permit for the GWMP (permit number VAR040111) (VDEQ 2015b). Phase II MS4s include small, discrete stormwater systems operated by cities, counties, towns, military installations, parks and parkways, colleges and universities, and other entities. The VPDES Phase II MS4 permit requires the permit holder to develop,

implement and enforce a program that includes the following “six minimum control measures" (VDEQ 2015c):

- Public education and outreach on stormwater impacts
- Public involvement and participation
- Illicit discharge detection and elimination
- Construction site stormwater runoff control
- Post-construction stormwater management in new development and redevelopment
- Pollution prevention/good housekeeping for municipal operations

Phase II MS4 systems must be designed and implemented to control the discharge of pollutants from their storm sewer system to the maximum extent practicable in a manner that protects the water quality in nearby streams, rivers, wetlands and bays (VDEQ 2015c).

In the long term, stormwater generated within and discharged from Fort Hunt Park would continue to be regulated under the VPDES Phase II MS4 permit for GWMP. The NPS would update its MS4 program as necessary to reflect any changes in long-term stormwater management resulting from the implementation of the proposed projects.

ISSUES AND IMPACT TOPICS

PLANNING ISSUES

Issues describe problems or concerns associated with current impacts from environmental conditions or current operations as well as problems that may arise from the implementation of any of the alternatives. NPS public involvement (of which this project has benefited from four opportunities for comment) is intended to be an open public process to determine the scope and significance of issues to be addressed in an environmental document for a proposed action. The NPS staff, the general public and representatives from other agencies, organizations, and businesses identified a number of issues and concerns for this planning effort. These issues and concerns have been included with impact topics that are discussed in “Chapter 3: Affected Environment” and are analyzed in “Chapter 4: Environmental Consequences.”

The project team identified potential issues associated with the proposed changes to Fort Hunt Park during internal scoping and based on the feedback obtained during the four public engagement opportunities, including consideration of comment analysis from the original 2011 public scoping, September 2011 EA, the June 2012 public scoping update, and the February 2015 alternative concepts public comment. Comments were solicited at public scoping meetings, through planning newsletters, and on the park’s web site (see “Chapter 5: Consultation and Coordination”).

Summarizing the areas of public concern and the underlying resource management priorities, the following five key issues are addressed by the development concept plan alternatives in this EA.

Interpretation of Historic Significance

There is currently very little interpretive/educational information shared with the public that focuses on the rich and varied historical significance of Fort Hunt. Recent discoveries and efforts to gather information regarding the site's role in WWII events have yet to be properly interpreted, further emphasizing the need for improved interpretation for all historic eras. Throughout the four public comment periods, this issue was consistently prominent.

Existing Recreational Facilities

The public has raised issues regarding the importance of preserving the park's existing recreational facilities, including strong opposition to removal of any picnic facilities or ballfields due to their importance to the local community and many regional users. Suggestions have been made to prioritize improved management and maintenance of existing facilities before considering new construction, including better management/enforcement of current picnic permits and need to update facilities such as the playground in Area A.

Safe, Accessible and Sustainable Visitor Services

Throughout the planning process a consistent focus has been on what a desired future condition for visitor services at Fort Hunt Park is – debate has often circled on how to best serve all park users and what level of change is necessary to reach project goals. A key focus of alternatives in this EA is to explore ways to enhance historic interpretation while being financially and environmentally responsible and providing access for all visitors.

Natural Environment and Open Space

Development should be sensitive to potential adverse impacts to Fort Hunt Park's open space and natural environment. Concerns noted the need for design sensitivity to these key characteristics of the park, particularly in siting of visitor center and potential increases in park visitation. Specific issues relate to protecting bald eagle habitat and forest cover on site.

Vehicular and Pedestrian Circulation and Parking

Various comments reflected concern regarding current traffic issues at the park and even greater concern over potential impacts to traffic due to the proposed alternatives. Particular issues related to the additional traffic that establishing a visitor contact station could bring to the park, and existing users not wanting to lose a valued resource of the road for pedestrian, dog walking and bicycle use.

Historic Structures and Cultural Landscapes

Preserving Fort Hunt's historic structures and cultural landscapes remain a core NPS consideration in the development and analysis of the proposed alternatives. Reflected in the protection of outlined Historic Land Use Restoration Areas in both action alternatives, as well as that of park historic structures, viewsheds and cultural resources, this priority goes hand in hand with the project purpose and need.

IMPACT TOPICS

Impact topics are resources of concern that could be affected either beneficially or adversely by the range of alternatives. The impact topics were considered in accordance with all applicable federal and state environmental regulations, policies, and orders.

Soils

Construction of a new visitor contact station, options to realign sections of roadway, and the construction of interpretive trails would result in soil disturbance. Also, existing drainage has caused soil loss. As a result of potential impacts to soils that would occur from both the no action and action alternatives, soils is addressed as an impact topic in this EA.

Vegetation

Construction of a new visitor contact station, reconfiguration of circulation patterns, establishing a site line from Battery Robinson to the Potomac River, and the construction of interpretive trails would result in impacts on vegetation. The potential impacts and mitigation measures to minimize impacts to vegetation need to be assessed. As a result of potential impacts to vegetation that would occur from both the no action and action alternatives, vegetation is addressed as an impact topic in this EA.

Wildlife and its Habitat

Construction of a new visitor contact station, reconfiguration of circulation patterns, and the construction of interpretive trails would impact wildlife habitat. As a result of potential impacts to wildlife habitat that would occur from both the no action and action alternatives, wildlife and its habitat is addressed as an impact topic in this EA.

Rare, Threatened, and Endangered Species

Construction of a new visitor contact station, reconfiguration of circulation patterns, and the construction of interpretive trails could result in impacts on rare, threatened, and endangered species habitat, particularly to several species of bats. As a result of potential impacts to such habitat that could occur from both the no action and action alternatives, rare, threatened, and endangered species is addressed as an impact topic in this EA.

Cultural Resources

The National Historic Preservation Act (NHPA; 16 USC 470 et seq.), NEPA, the NPS Organic Act, NPS Management Policies 2006 (NPS 2006b), DO–12, and DO–28, require the consideration of impacts on any cultural resources that might be affected. The NHPA, in particular, requires the consideration of impacts on cultural resources either listed in, or eligible to be listed in, the NRHP. Cultural resources include historic structures and districts, cultural landscapes, archeological resources, ethnographic resources, and museum collections (prehistoric and historic objects, artifacts, works of art, archival documents, and natural history specimens). Impacts to historic structures and districts, cultural landscapes, and archeological resources are the cultural resource topics carried forward for analysis in this EA.

Historic Structures or Districts

Historic structures or districts are defined as historic properties significant in the history of American architecture, culture, engineering, or politics at the national, state, or local level. The project area contains historic structures that may be impacted by both the no action and action alternatives; therefore, historic structures are addressed as a topic.

Cultural Landscapes

As specified in Chapter 5 of the NPS Management Policies (2006), the NPS is committed to identifying, documenting, and protecting cultural resources. Cultural landscapes are defined as a geographic area, including both cultural and natural resources and the wildlife and wildlife habitat or domestic animals therein, associated with an historic event, activity, or person or exhibiting other cultural or aesthetic values. The project area contains cultural landscapes that may be impacted by both the no action and action alternatives; therefore, cultural landscapes are addressed as a topic.

Archeological Resources

Archeological resources include material remains or physical evidence of past human life or activities of archeological interest. The project area has the potential to contain archeological resources that may be impacted by the action alternatives; therefore, archeological resources are addressed as a topic.

Visitor Use and Experience

Construction of a new visitor contact station, reconfiguration of a ballfield, installation of a fitness circuit, and construction of interpretive trails would impact visitor use and experience. One objective of the SDP is to improve the visitor experience and provide direction for park management. As a result of potential impacts to visitor use and experience that would occur from both the no action and action alternatives, visitor use and experience is addressed as an impact topic in this EA.

IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS

The topics discussed below would either not be affected or would be affected negligibly by the alternatives evaluated in this document. Therefore, these topics have been briefly discussed in this section of the EA and then dismissed from further consideration or evaluation. Negligible effects are effects that are localized and immeasurable at the lowest level of detection.

Geology

Fort Hunt Park is situated in the Coastal Plain physiographic province (Bailey 1999). Geology of the region is characterized by thick, unconsolidated marine sediments (William and Mary n.d.). Mineral resources of the Coastal Plain consist of silts, sands, and gravels which are used as aggregate materials. None of the proposed actions would include activities that would affect geologic resources. Therefore, geology was dismissed from further analysis.

Geologic Hazards

Fort Hunt Park is set in a flat, low-lying area that is not prone to sinkholes and has a low risk of earthquakes (USGS 2008; DMME 2006). No geologic hazards are expected to occur in the project area. Therefore, geologic hazards was dismissed from further analysis.

Topography

Fort Hunt Park is characterized by low relief ranging from 0 to 50 feet above mean sea level. Historical use of the land has caused some disturbance to its original topographic setting. Currently, the park open space and maintained areas consist of one to five percent slopes with moderately sloping drainage channels that predominately drain towards the Potomac River. The woodland areas on the southern portion of the park consist of 5 to 35 percent slopes. Minor grading would be required for construction activities under the proposed actions. The proposed actions to construct new facilities or remove existing facilities would include some excavations to construct or remove footers or foundation; however, the NPS would use best management practices and fill excavated areas with appropriate fill material to restore areas and maintain grades. As a result, topography would not be altered and therefore, was dismissed from further analysis.

Prime and Unique Farmland

The Farmland Protection Policy Act of 1981 and the NPS require an evaluation of impacts on prime and unique agricultural lands to minimize the extent to which federal programs contribute to the unnecessary or irreversible conversion of farmland to nonagricultural uses. Prime farmland is defined as land with the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and which is also available for these uses. According to the Natural Resources Conservation Service (NRCS), several soil types within the Fort Hunt Park SDP boundary are designated as prime farmland soils (USDA NCRS n.d.b). However, Fort Hunt Park is not currently in agricultural production and no plan currently exists to convert the park into agricultural lands in the future. Therefore, prime and unique farmland was dismissed from further analysis.

Hydrology

Stormwater generated within Fort Hunt Park is managed by a network of ditches, inlets, pipes, and culverts that conveys runoff to discharge points in the vicinity of the park. As discussed previously in *Virginia Stormwater Management Program* under *Future Compliance and Permits*, discharges from the stormwater management system in Fort Hunt Park are regulated under the VPDES Phase II MS4 permit for the GWMP. None of the proposed projects would be located in existing drainage channels within the park, nor are any of the projects intended to directly modify the park's stormwater management system. At most, minor modifications such as the relocation of, or small increases or decreases in the number of, selected components of the stormwater management system such as inlets, culverts or pipes, may be necessitated by the implementation of the proposed projects. Any changes to the park's stormwater management system associated with the proposed projects would be identified and incorporated into each project as the planning and design of the projects continues. The NPS would update its MS4 program as necessary to reflect any changes in long-term stormwater management resulting from the implementation of the proposed projects. In addition, the proposed projects would meet the requirements of the EISA and would utilize long-term best management practices (BMPs) to manage stormwater runoff generated within Fort Hunt Park. Because the

proposed projects would not adversely impact hydrology, this impact topic was dismissed from further analysis.

Water Quality

NPS policy regarding water quality is to avoid, whenever possible, "the pollution of park waters by human activities occurring within and outside the parks" (NPS 2006b). In order to preserve water quality, the NPS requires water quality protection consistent with the CWA. Under the CWA, pollution control programs and water quality standards are set by the EPA. Furthermore, federal facilities must meet the Total Maximum Daily Loads requirements per Executive Order 13508, *Chesapeake Bay Protection and Restoration*.

Fort Hunt Park is situated within the Little Hunting Creek watershed, which is bisected by two sub-watersheds: South Little Hunting Creek and East Potomac River. The northern portion of Fort Hunt Park drains to Little Hunting Creek, while the southern portion drains to the Potomac River. Water quality of both of the sub-watersheds has been compromised due to urban development in the region. The impervious area in the Little Hunting Creek watershed is approximately 25 percent of the total area (Fairfax County 2004).

In 1988, the Commonwealth of Virginia enacted the Chesapeake Bay Preservation Act (Bay Act). The Bay Act required the 84 Virginia communities, including Fairfax County, which border on the tidal portions of rivers that drain into the Chesapeake Bay (Tidewater jurisdictions) to institute water quality protection measures to improve the declining health of this unique national resource and its tributaries. Fairfax County enacted a Chesapeake Bay Preservation Ordinance (Ordinance) which regulates the kinds of development that can occur in sensitive areas along streams that drain into the Potomac River and eventually the bay. These are known as Resource Protection Areas (RPAs).

State regulations require that RPAs be designated around all water bodies with perennial flow. The Department of Public Works and Environmental Services conducted field studies to identify all perennial streams throughout the county and used this information to prepare a set of maps showing the location of RPAs as defined under the revised Ordinance (Figure 3) (Fairfax County 2005).

RPAs generally are areas into which development may not encroach. However, the ordinance protects existing structures and uses in the RPA. Such structures and uses, including lawns and gardens and other maintained landscaping, can remain and be maintained, but may not be expanded unless a waiver or exception is granted. In order to maintain the functional value of the RPA buffer, indigenous vegetation may be removed, subject to approval by the county, from a buffer area only to provide for reasonable sight lines, access paths, general woodlot management and habitat management. Noxious weeds and dead, diseased, or dying trees or shrubbery may be removed, subject to approval by the county, provided that where they are removed, they are replaced with other native vegetation that is equally effective in retarding runoff, preventing erosion and filtering nonpoint source pollution from runoff. The removal of indigenous vegetation to create lawns is not allowed.

Figure 3. Resource Protection Area Map

No receiving waters are in the areas of the proposed actions. The nearest receiving water body is a small wetland area in the southern portion of the park (formerly excavated CCC pond). The wetland is buffered by a mature forest, and is approximately 400 feet from any proposed construction activity.

Implementation of the no action or action alternatives at Fort Hunt Park would have negligible impacts on water quality. No construction activities or clearing would occur within the RPA. Construction under the action alternatives would take place in previously disturbed areas, and site design would limit new impervious surface in the park to the extent feasible. Short-term best management practices (BMPs), such as erosion and sediment control during construction, would be implemented to prevent disruptions to nearby water resources. Long-term BMPs, such as site designs established by the Sustainable Sites Initiative, would be incorporated into the proposed actions in order to reduce impacts. As previously noted, the NPS would modify its Phase II MS4 program as necessary to reflect any changes in long-term stormwater management resulting from the implementation of the proposed projects.

Due to the existing site layout, proposed site design, and implementation of short-term and long-term BMPs, water quality impacts of the no action or action alternatives would be negligible; therefore, water quality was dismissed from further consideration.

Wetlands

The NPS recognizes the USFWS wetland definition as outlined in Classification of Wetland and Deepwater Habitats of the United States (USFWS 1979). This classification system generally states that wetlands are transitional lands between terrestrial and aquatic systems. Saturation with water determines the nature of soil development and the types of plant and animal communities that inhabit wetlands.

A review of the USFWS National Wetlands Inventory (NWI) indicates that palustrine forested wetlands exist in the southern portion of the park (USFWS 2011). The palustrine forested designation describes wetlands that are nontidal, and are dominated by woody vegetation 6 meters tall or taller. The wetlands occupy approximately 0.6 acres. A field review of natural resources by the project consultants on January 24, 2011 verified the presence of palustrine forested wetlands in the area. Saturated conditions were observed as a result of the low-lying aspect of the area, and as a result of the barrier to outflow created by the George Washington Memorial Parkway. NWI Mapping of Fort Hunt Park is provided in Figure 4.

Construction activities in wetlands would be avoided under all of the proposed action alternatives. The wetlands in the south of the park are approximately 400 feet from proposed construction activities, and are buffered by a mature forest stand. Hydrology of the wetlands would be undisturbed by the proposed actions, because all new construction on site is to occur in previously disturbed areas. Therefore, because there would be no direct impacts to wetlands under the no action or action alternatives, this topic was dismissed.

Figure 4. National Wetland Inventory Map

Floodplains

In order to preserve floodplain values and minimize potentially hazardous conditions associated with flooding, the NPS requires examination of impacts to floodplains and potential risk involved with placing facilities within floodplains. Based on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Mapping of Fort Hunt Park (Figure 5), portions of Fort Hunt Park are within the 100-year floodplain (FEMA 2010). These areas occur along the site's southern boundary, the Parkway. The majority of the proposed projects would occur within areas designated as Zone X, which are areas that have been determined to be outside the 500-year floodplain. Some tree clearing associated with the restoration of the sight line from Battery Robinson to the Potomac River could occur within the area south of the GWMP, which is designated as Zone AE. This zone is defined as a special flood hazard area subject to inundation by the 1-percent (100-year) annual chance flood event, where base flood elevations have been determined. Any tree clearing associated with the project that would occur in this portion of Zone AE would be limited in the context of the trees and vegetation that would remain undisturbed in this area and would be mitigated in accordance with NPS policies. There would be no effect on the capacity of the floodplain to absorb floodwaters, nor would it cause a disproportionate displacement of flood waters to other areas of the floodplain along the Potomac River.

Indirect impacts to the floodplain due to the removal of ground vegetation and increases in impervious surfaces associated with the remaining projects included in the proposed action are expected to be negligible. The existing floodplain areas are buffered by riparian vegetation, which would not be disturbed by the proposed actions. New construction is not expected to increase the frequency, duration, or elevation of floods at Fort Hunt Park. Therefore, floodplains was dismissed from further analysis.

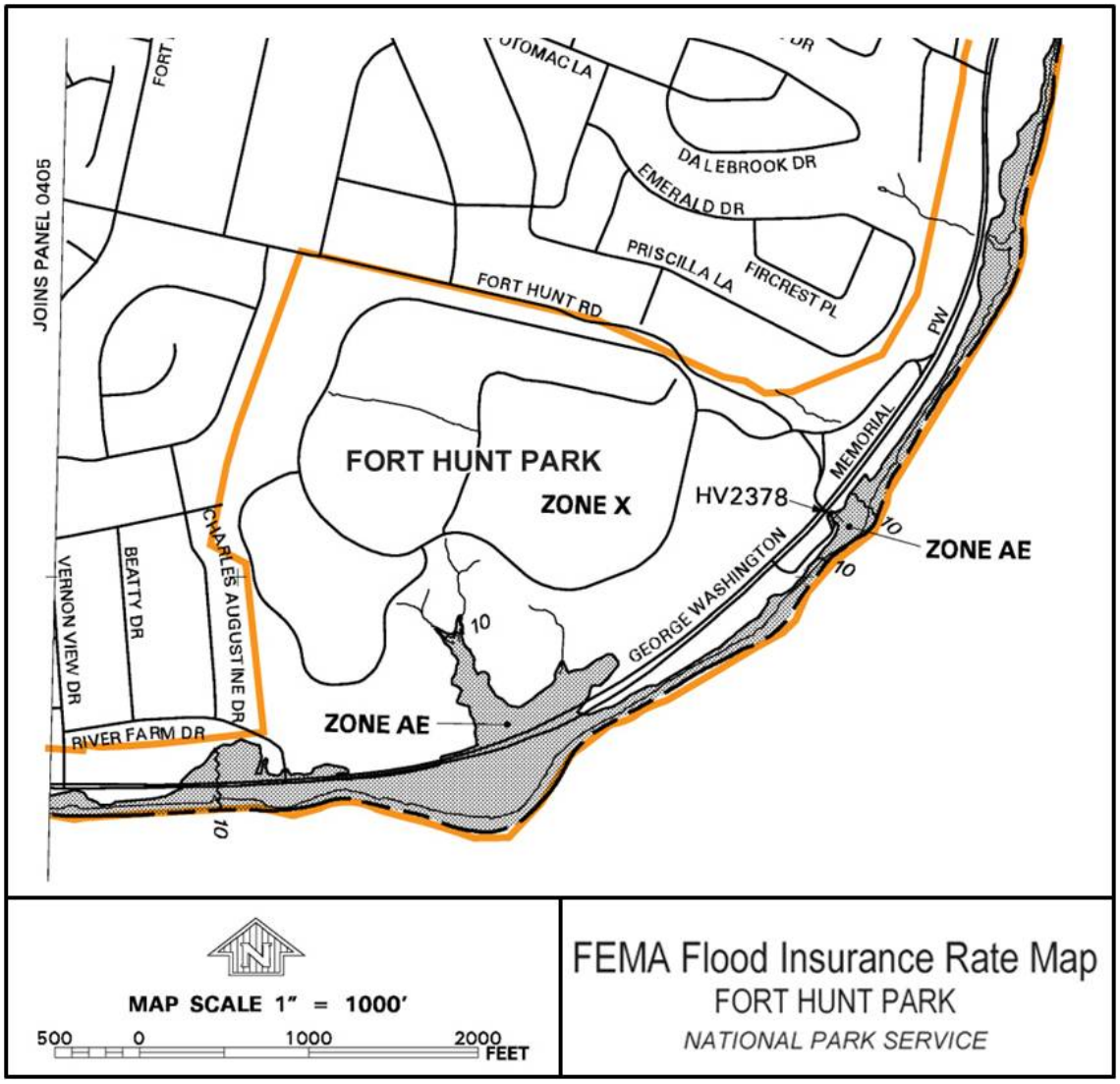

Figure 5. FEMA Flood Insurance Rate Map

Museum Collections

Museum collections include prehistoric and historic objects, artifacts, works of art, archival documents, and natural history specimens. Prevention of damage and minimization of potential for deterioration are NPS management goals. No museum collections would be impacted and therefore this topic has been dismissed from further analysis.

Ethnography

Ethnographic resources include cultural and natural features of a park that are of traditional significance to traditionally associated peoples, which include contemporary park neighbors and ethnic or occupational communities that have been associated with a park for at least two or more generations (40 years), and whose interests in the park's resources began before the park's establishment. No ethnographic resources would be impacted and therefore this topic has been dismissed from further analysis.

Indian Trust Resources

Secretarial Order 3175 requires that any anticipated impacts to Indian trust resources from a proposed action by Department of Interior agencies be explicitly addressed in environmental documents. The Federal Indian Trust responsibility is a legally enforceable obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal law with respect to American Indian and Alaskan native tribes. Based on consultation with the NPS Cultural Resources Manager and Virginia Council on Indians, there are no known Indian trust resources in the study area. The lands comprising the park are not held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. Therefore, this impact topic was dismissed from further analysis.

Scenic Resources (Aesthetics and Viewsheds)

The alternatives would not noticeably alter views or affect scenic resources within the park. New facilities are generally located away from existing historic structures such as the NCO Quarters and batteries; therefore, they would not affect important views in the park. For this SDP, the impacts to views are briefly described in this EA in the Cultural Landscape section. Therefore, this impact topic was dismissed from further analysis.

Human Health and Safety

In accordance with the 1916 Organic Act, the NPS strives to protect human life and provide injury-free visits while preserving human life over all other management actions. All proposed actions at Fort Hunt Park represent a continuation of existing operations and maintenance of the park. The changes in visitor use of the park are not expected to impact the health and safety of park visitors or personnel in any measurable way. Safety concerns were raised by the public during scoping if the loop road were to be reopened because of past illicit activities in this area. This safety concern was taken into consideration with the development of this road would remain closed. During construction, minor short term risks to the health and safety of construction workers are expected. All workers would follow an approved health and safety plan, which would incorporate all applicable regulations. Because the proposed actions are not expected to have any other impacts to human health and safety, this topic was dismissed from further analysis.

Natural Soundscapes

In accordance with NPS Management Policies (2006) and DO-47, Sound Preservation and Noise Management, an important part of the NPS mission is preservation of natural soundscapes associated with national park units. Natural soundscapes exist in the absence of human-caused sound. The natural ambient soundscape is the aggregate of all the natural sounds that occur in park units, together with the physical capacity for transmitting natural sounds. Natural sounds occur within and beyond the range of sounds that humans can perceive and can be transmitted through air, water, or solid materials. The frequencies, magnitudes, and durations of human-caused sound considered acceptable varies among NPS units, as well as potentially throughout each park unit, being generally greater in developed areas and less in undeveloped areas.

Fort Hunt Park is surrounded by suburban neighborhoods and the George Washington Memorial Parkway. As a result, the opportunity to experience natural soundscapes within the park is highly degraded. Construction associated with implementation of the proposed action, e.g. the hauling of material or the operation of construction equipment, could result in dissonant sounds, but such sounds would be temporary. Once construction is complete vehicle noise through the park would exist at roughly the same levels as it does today. Since there would be no change in the artificial noise level and NPS policies allow for greater overall magnitudes of human-caused sound in developed areas, this topic was dismissed from further analysis.

Transportation

Fort Hunt Park is located along the Parkway, a scenic route maintained by the NPS. The Parkway extends from the Capital Beltway (I-495) to Mount Vernon in Fairfax County, VA, following the Potomac River. The Parkway is intended not only to provide transportation, but to provide recreation and environmental conservation areas (NPS 2008b). The primary north and south access to the park is from Parkway exits. Fort Hunt Road also provides access to the park and to surrounding residential properties. The roadway within Fort Hunt Park generally forms a loop following the perimeter of open spaces in the park.

Construction of the action alternatives would be short-term in nature. No construction activity is proposed outside of Fort Hunt Park. The action alternatives involve minor changes to the internal circulation patterns within Fort Hunt Park; however, these changes would not impact traffic and transportation outside of the park. Because neither the no action nor action alternatives would impact the surrounding roadway network, this topic has been dismissed from detailed analysis in this EA.

Land Use

Fort Hunt Park occupies 157.4 acres in Fairfax County, Virginia and is entirely designated to the use of the federal government. To the south and to the east, Fort Hunt is bordered by the Parkway and the Potomac River. To the north and to the west, the park is bordered by private properties, consisting of single family homes. The proposed actions are expected to have negligible impacts on land uses of the area, because the proposed actions would not change the existing land use at Fort Hunt Park. Fort Hunt would remain a park offering the same type of recreational activities, which also would include a visitor contact station. Therefore, this topic was dismissed from further analysis.

Park Operations and Management

Fort Hunt Park is one of many parks within GWMP, near the southern terminus of the Parkway. Fort Hunt Park is open year-round from sunrise to sunset (NPS 2015). Picnic Area E is open on a first- come, first-served basis. Picnic Areas A, B, C-1, C-2, C-3, and D are available by reservation from April through October. Alcohol consumption is allowed at the park for those with a picnic area permit. The Fort Hunt Concert Series takes place on Sunday evenings from 7:00 p.m. to 8:00 p.m. during the summer months. Fort Hunt Park includes approximately five acres each of ball fields and acres of parking, 1.5 acres of U.S. Park Police facilities, 0.5 acres of park maintenance facility, and 7,100 linear feet of trails. Approximately half of the 157-acre park is made up of wooded or partially wooded areas, while open space, including ballfields, covers an estimated 45 acres of Fort Hunt.

The Fort Hunt Park Maintenance Facility is used to store equipment for the maintenance of the southern section of the Parkway. The U.S. Park Police station within Fort Hunt Park contains paddocks for housing U.S. Park Police horses which are used throughout the local NPS parks. Police staff who service the southern portion of the Parkway utilize the station within Fort Hunt Park. Park users indicated during public scoping that they would like to maintain the U.S. Park Police presence within the park as a crime deterrent and some comments asked for additional staffing to support the park. The proposed action would not affect the hours, operation, maintenance, or U.S. Park Police station location at Fort Hunt. Therefore, this topic was dismissed from further analysis.

Socioeconomics

NEPA requires an analysis of impact to the human environment including social, economic, and demographic elements in the project area. Construction of action alternatives may provide a temporary benefit to the local economy with the hiring of construction workers and an increase in local revenue generated from the construction workers and activities. However, this beneficial effect is expected to be minimal and temporary.

Fort Hunt Park does not permit commercial operations at the park. However, the pavilion and picnic area renters often hire caterers, entertainers, and/or rental equipment such as sound systems or inflatables from businesses throughout the Mount Vernon/Alexandria Virginia area. At the most, the action alternatives would reduce one permitted picnic pavilion at Fort Hunt Park, resulting in a negligible reduction in number of vendor rentals by park users.

The no action and action alternatives are not expected to have any appreciable short or long-term impact on socioeconomics of the surrounding area; therefore, this topic is dismissed from further analysis.

Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations, directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority or low-income populations.

Fort Hunt Park is within the Fort Hunt census designated place (CDP), which encompasses the 22301 ZIP code of Fairfax County, Virginia (U.S. Census Bureau 2013). According to the 2009-2013 Community Survey, the Fort Hunt CDP had a total population of 16,045. Approximately 17.2 percent of the population is age 65 and

over. The population is approximately 90.4 percent White, 2.3 percent Black or African American, 3.5 percent Asian, and 2.9 percent two or more races. About 1.5 percent of individuals within the CDP live below the poverty level. Minorities and low-income populations do exist in the Fort Hunt CDP; however, no populations were identified as disproportionately impacted by the SDP.

Environmental justice is dismissed from further analysis for the following reasons:

- As part of the planning process, public participation was actively sought by the NPS and gave equal consideration to all input from all persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- The proposed actions would not result in any identifiable adverse human health effects; therefore, there would be no direct or indirect effects on any minority or low income population.
- The impacts associated with the proposed actions would not disproportionately affect any minority or low income population.
- The impacts associated with the proposed actions would not result in any identified effects that would be specific to any minority or low income population.

Air Quality

Due to construction, dust and vehicle emissions would cause short term impacts on local air quality in the study area. The impacts are associated with hauling materials and operating power equipment, and are expected to have negligible effects on local or regional air quality and park resources.

Once construction at Fort Hunt Park is complete, the changes in visitor use of the park are not expected to increase impacts on air quality in any measurable way. The proposed actions are not intended to increase the amount of visitors and corresponding number of vehicle trips to the park, nor would they create a new permanent source of emissions. As such, impacts on the park's current level of air quality with regard to vehicle or stationary source emissions are unlikely to occur. For these reasons, air quality was dismissed from further analysis.

Energy Requirements and Conservation Potential

The NPS strives to incorporate the principles of sustainable design and development into all facilities and park operations. Sustainability can be described as the result achieved by doing things in ways that do not compromise the environment or its capacity to provide for present and future generations. Sustainable practices minimize the short- and long-term environmental impacts of developments and other activities through resource conservation, recycling, waste minimization, and the use of energy efficient and ecologically responsible materials and techniques. Value analysis and value engineering, including life cycle cost analysis, are also performed to examine energy, environmental, and economic implications of proposed management decisions and development. The park also encourages suppliers, permittees, and contractors to follow sustainable practices. Consequently, any adverse impacts relating to energy use, availability, or conservation would be negligible. Therefore, energy requirements and conservation potential is an impact topic dismissed from further consideration.

Climate Change

Climate change refers to any significant changes in average climatic conditions (such as mean temperature, precipitation, or wind) or variability (such as seasonality and storm frequency) lasting for an extended period (decades or longer). Recent reports by the U.S. Climate Change Science Program, the National Academy of Sciences, and the United Nations Intergovernmental Panel on Climate Change provide evidence that climate change is occurring as a result of rising greenhouse gas (GHG) emissions and could accelerate in the coming decades.

While climate change is a global phenomenon, it manifests differently depending on regional and local factors. General changes that are expected to occur in the future as a result of climate change include hotter, drier summers; warmer winters; warmer water; higher ocean levels; more severe wildfires; degraded air quality, more heavy downpours and flooding, and increased drought. Climate change is a far-reaching, long-term issue that could affect the park, its resources, visitors, and management. Although some effects of climate change are considered known or likely to occur, many potential impacts are unknown. Much depends on the rate at which the temperature would continue to rise and whether global emissions of greenhouse gases can be reduced or mitigated. Climate change science is a rapidly advancing field and new information is being collected and released continually.

Construction activities associated with implementation of the proposed action would contribute to increased GHG emissions but such emissions would be short-term, ending with the cessation of construction, and it is not possible to meaningfully link the GHG emissions of such individual project actions to quantitative effects on regional or global climatic patterns. Any effects on climate change would not be discernible at a regional scale. Therefore, climate change was dismissed from further evaluation.

CHAPTER 2: ALTERNATIVES

INTRODUCTION

NEPA requires federal agencies to explore a range of reasonable alternatives aimed at addressing the purpose of and need for the proposed action. The alternatives under consideration must include the "no action" alternative as prescribed by CEQ regulations for implementing NEPA (40 CFR 1502.14).

The action alternatives analyzed in this document, in accordance with NEPA, are based on the result of internal scoping and public scoping and meet the overall purpose of and need for proposed action. As discussed in Chapter 1, the action alternatives presented reflect public and agency comment received from four rounds of review: scoping in early 2011; feedback on the EA in late 2011 that included Alternatives 2 and 3; and renewed scoping in mid-2012, as well as a review of new alternative concepts in February 2015. Through these various opportunities for input, as well as additional internal analysis, NPS explored and objectively evaluated three alternatives (Alternatives 1, 4, and 5) in this EA, including:

- Alternative 1: No Action
- Alternative 4: Interior Visitor Services
- Alternative 5: Gateway Visitor Services

Alternatives that were considered, but were either not technically feasible, did not meet the purpose of, and need for, the project, created unnecessary or excessive adverse impacts on cultural or natural resources or visitor use, and/or conflicted with the overall management of the park or its resources, were dismissed from further analysis. These are also described in this chapter.

The Fort Hunt Park maintenance facilities and U.S. Park Police station and stables were initially considered as part of this planning process. While there is interest in changing the use of these facilities, with potential for visitor services or other uses, their current functional need prevents any productive long-term planning at this time. Because the planning required for any kind of improvements or relocation of these facilities is outside of the scope of this effort and not relevant to the core purpose of this SDP, it has been determined they should not be included in this alternatives assessment.

It should also be highlighted that more planning and design work would need to be carried out for the completion of many actions proposed in this EA, such as final design and location of a visitor contact station and interpretive trail. This would include additional steps for NEPA and NHPA compliance, as well as potentially additional rounds of public comment.

DESCRIPTION OF ALTERNATIVES

ALTERNATIVE 1: NO ACTION

The no action alternative describes the action of continuing the current management operations and conditions. It does not imply or direct discontinuing the present action or removing existing uses, development, or facilities. While the no action alternative does not meet the purpose and need of the project, it provides a basis for comparing the management direction and environmental consequences of the proposed action alternatives.

Interpretive Facilities

Currently, visitors to the park can explore the exteriors of former gun batteries and the Battery Commander's Station, supplemented by a series of eight wayside exhibits that interpret various aspects of the site's history. A WWII exhibit consists of a commemorative plaque on a stone marker. These resources, while providing some opportunities to interpret history, are limited in communicating the depth and diversity of the history at Fort Hunt.

Recreational Facilities

Recreational facilities would continue to be managed and maintained as they are today. Picnic Pavilions/Areas A, B, C, and D would continue to be available by reservation and Picnic Area E would be available on a first come basis. The ballfields, hiking trails, volleyball court, and playground would continue to be maintained in their current state.

Vehicular and Pedestrian Circulation and Parking

The current vehicular roadway within Fort Hunt Park which generally forms a loop following the perimeter of open space in the park would remain as it is today. Traffic along the loop road is two-way from the park entrance to Parking Area B. Beyond this parking area, traffic is designated as one-way throughout the remainder of the loop with the second lane dedicated to bicyclists and pedestrians. A paved road connects to the loop road at the south of the park. This road has been closed to vehicular traffic and is used by park visitors as a walking and biking trail. Parking is provided at five lots, within close proximity to the picnic pavilions and areas.

Historic Structures and Cultural Landscapes

The four gun batteries, Battery Commander's Station, and NCO Quarters would continue to be maintained by the park. Cultural landscape features such as the tree rows, commemorative trees near the NCO Quarters, and other CCC features would not be impacted.

ELEMENTS COMMON TO ALL ACTION ALTERNATIVES

OVERVIEW

- Construct Architectural Barriers Act Architectural Standards (ABAAS)-compliant interpretative trail
- Restore historic sight line to Potomac River from Battery Robinson
- Establish Historic Land Use Restoration Areas, including the repurposing of the ballfield in Area D to accommodate multiple recreation types
- Enhance access and recreational amenities on lower shared use trail (closed lower road)
- Upgrade safety and accessibility of Area A playground equipment
- Maintain existing park access roadway with option for limited road removal and realignment
- Continue to maintain the Spanish-American War era batteries and the Battery Commander's Station in accordance with the *Fort Hunt Batteries Conditions and Treatment Plan* (NPS 2002b)

Option Common to All Action Alternatives – Limited Road Segment Removal and Realignment

Both action alternatives include the option to remove and realign segments of the park's main loop road, as well as to remove Area E Restrooms (which are closed seasonally) and Parking Area, in order to enhance long term protection and interpretation of resources within Historic Land Use Restoration Areas (see Figure 6).

This option would apply to both Alternative 4 and Alternative 5 and includes the following:

- Remove Picnic Area E parking and restrooms and a portion of Area D parking; re-vegetate as appropriate
- Realign the loop road by removing paved sections and paving the new route to avoid Historic Land Use Restoration Areas, maintaining one-way circulation and lane dedicated to bicyclists and pedestrians
- Consider ways to replace a portion of loss of approximately 50 parking spaces by utilizing previously disturbed areas near Parking Areas A, B, and C; reconfiguring the existing parking lots to increase number of spaces; and/or creating parking along the realigned sections of the loop road.

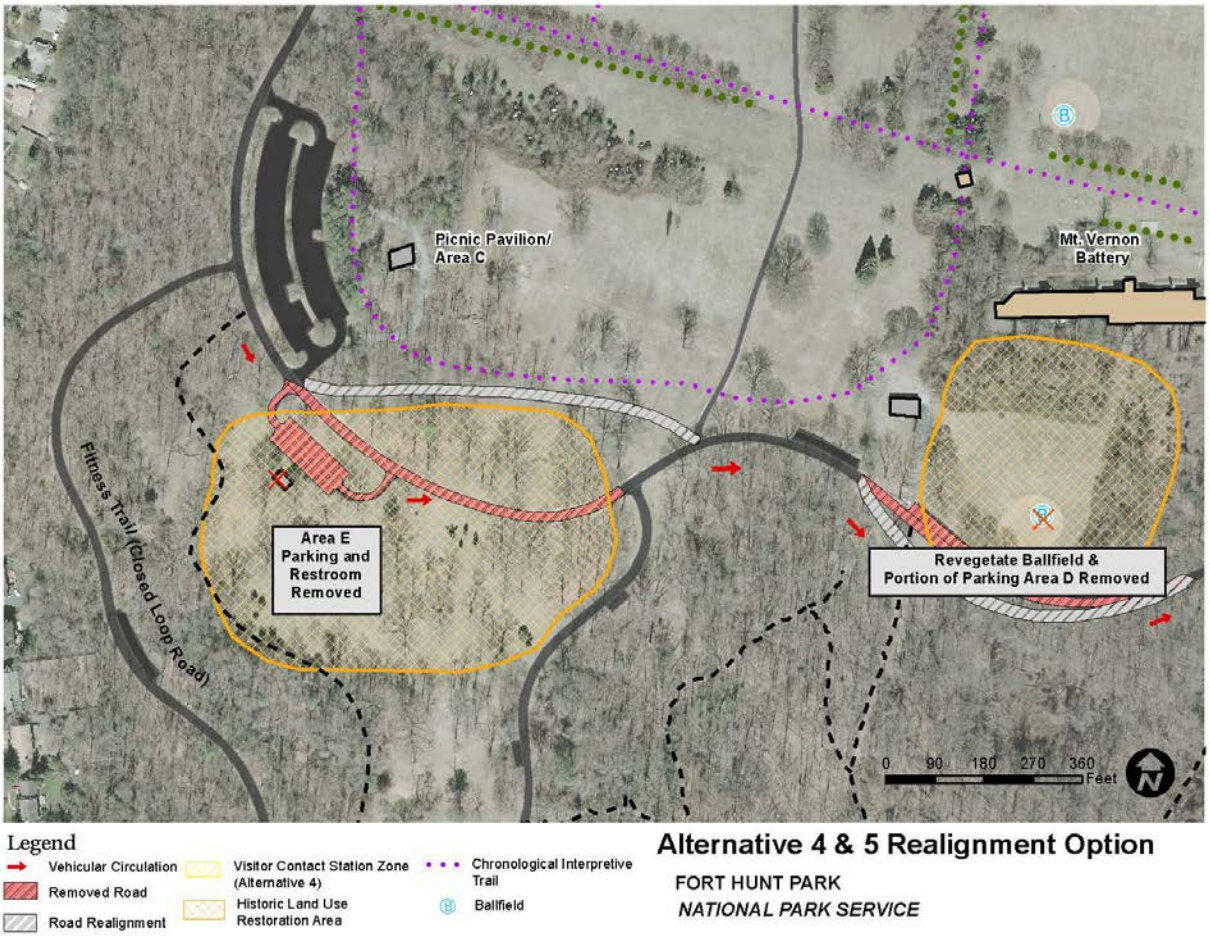

Figure 6. Alternatives 4 & 5 Limited Road Segment Removal and Realignment Option

Based on site inspection, discussion among the superintendent, park division chiefs, interpretive staff, NPS planning and design professionals, and comments from the public, the SDP has identified feasible and suitable options for expanding visitor services at Fort Hunt Park. While the primary purpose of the new interpretive loop trail would be interpretation, it would also serve as a safe off-road opportunity for walking, jogging, bird watching and other recreational uses. Under each of the action alternatives, new visitor service zones would be established to provide interpretive and educational opportunities for visitors. The visitor service zones, which could include a visitor contact station, would improve the ability of GWMP to orient park visitors and increase educational and interpretive opportunities. The visitor service zones would enhance the visitor experience consistent with the project objectives, as well as the goals outlined in the GWMP Long-Range Interpretative Plan for Fort Hunt Park. Two different locations for the visitor service zones have been evaluated under the action alternatives.

Interpretive Facilities

While only evaluated at a conceptual level in this plan, the visitor service zones could offer additional facilities to enhance the visitor experience. Such facilities could include exhibit space, work and storage space, a kiosk, and administration support space. An outdoor interpretive area could provide outdoor opportunities for learning about the park's history within the contextual historic features of the park. Further study would be conducted with a future planning (and NEPA) process, if necessary, to determine the final design of the facility. If implemented, the design of a visitor contact station would be appropriate for the park context and would meet the *Secretary of the Interior's Standards for Treatment of Historic Properties*, specifically those outlined in the *Guidelines for the Treatment of Cultural Landscapes*.

A chronological interpretive pedestrian trail is included in both action alternatives, providing a walking history of the park. The trail would begin with the history of the Native Americans who inhabited the site prior to European colonization. The trail would continue in a loop through the park, telling the story of the site's role as George Washington's River Farm, through the Spanish-American War, as a facility for WWI Bonus Marchers, as a CCC Camp, its secret WWII military operations, to its present use as a national park and recreation facility. The trail would connect to a restored historic sight line to the Potomac River from Battery Robinson that would enhance interpretation, particularly relating to Fort Hunt's role during the Spanish-American War. This will require close work with natural resource managers to carefully plan appropriate trimming and maintenance of vegetation in the area, as well as planning for improvements to visitor access to the battery.

The trail would be consistent with GWMP's interpretative theme elements for Fort Hunt Park identified in the GWMP Long-Range Interpretative Plan (2005) and Foundation Document (2014), furthering GWMP's ability to meet visitor experience goals. The trail would be approximately 6,200 linear feet. Trail alignment, width, surface material, and other details would be determined in a later design phase. The trail would be designed as a pedestrian trail that meets ADA standards for accessibility, but not intended for use by bicyclists.

Recreational Facilities

Under the two action alternatives no picnic areas would be closed and, aside from Area C in Alternative 4, none of the picnic pavilions would be affected. Under Alternative 4, the number of reserved parking spaces associated with permitted activities for picnic areas in Area C may be reduced; removal of the Area C pavilion would be contingent on further study and visitor contact station design as well as determination of compatibility of uses.

The lower road would remain closed to vehicles in both action alternatives, ensuring its long-term use as a paved multi-use fitness trail that would continue to be a recreational resource for pedestrians and cyclists. Opportunities to improve connections from the trail to adjoining hiking trails, such as maps and wayfinding signs would be explored. Actions would be taken to improve the trail entrance from the loop road to make it a safer and more inviting transition for users, including evaluation of replacing the current gate with removable bollards. In addition, the wider paved areas of the trail (previously used as parking spaces) or on the paved road itself would be considered for development of recreational amenities such as exercise stations. An estimated eleven to sixteen stations could be placed in these areas, depending upon the type of exercises and the placement of the equipment and signage for each station. Two additional signs would be located at each access point of the closed road to provide instruction and to announce the finish of the trail.

A small footprint of poured-in-place safety surfacing would be installed under each piece of equipment. Archeological testing would be needed if areas identified for equipment installation were previously undisturbed. Designated trails in the wooded area of Fort Hunt Park would be rehabilitated to correct 60-90 feet of trail erosion and remove three to four fallen trees impeding trail access. Some existing social trails would be closed and restored to the natural landscape through reseeding. Other existing social trails that provide connections to other trails and areas of Fort Hunt Park would be maintained as designated trails; the maintenance of these trails would include the removal of one to two fallen trees impeding trail access.

Falling within one of the Historic Land Use Restoration Areas, the ballfield in Area D and other flat grassy areas would be reconfigured to allow for multi-purpose recreation activities. These would not require a permit under both action alternatives. The ballfields in area A and B would remain.

Both action alternatives would seek to upgrade the Area A playground equipment and surfaces to reflect the concept of Universal Design and meet the Consumer Products Safety Institute standards for safety. The new playground equipment would add multi-activity play structures that meet ADA standards and replace the existing loose sand surface with a unitary material that is accessible, low maintenance and provides a reliable cushion for the safety of users.

Both action alternatives include the option of limited removal and realignment of segments of the park's main loop road, which would affect recreational facilities in the removal of Area E restrooms (which are closed seasonally) and parking area. Under this option, Area E would remain open for picnicking in both alternatives.

Vehicular and Pedestrian Circulation and Parking

The core of both action alternatives would include very little physical changes to vehicular circulation and parking in the park. Under both action alternatives, the park entrance would remain in place and the existing loop road would remain the primary circulation route. However, as detailed above, each alternative includes the option for the limited removal and realignment of segments of the main loop road and the removal of the Area E parking area and a portion of Area D parking, anticipated to total approximately 50 parking spaces. Removal of these parking areas and realignment of the loop road would remove infrastructure and visitor activities in sensitive resource areas. This will allow for an enhancement of the cultural landscape consistent with the project objectives. Future design work would include consideration of ways to replace some of the parking spaces lost by utilizing previously disturbed areas adjacent to existing parking areas in A, B, and C, potentially including paved surfaces outside of the restoration areas set to be removed as part of the option. Alternatively, existing parking lots could be reconfigured to expand the number of spaces through reconfiguration. Also, the new realignment of the roadway could include areas that would include parking. Re-vegetation would follow a management process as appropriate, which could include seeding with grass and maintaining the area as open space. These options present notably scaled back changes to vehicular circulation in comparison to alternatives previously considered and are now dismissed.

The new interpretive trail included in both alternatives presents the largest change in pedestrian circulation. The trail would offer pedestrians an alternative to the current bicycle/pedestrian lane of the loop road, for interpretation and recreation as well as general circulation around the park. In addition, the improvements to

the lower shared-use trail (closed road) would also benefit pedestrian and bicycle circulation in that area of the park and provide an enhanced connection to the hiking trails.

Historic Structures and Cultural Landscapes

The Spanish-American War era batteries and Battery Commander's Station would continue to be maintained by the park in accordance with the *Fort Hunt Batteries Conditions and Treatment Plan* (NPS, 2002b). The Brick Storage Building (also known as the CCC Oil Storage House) as well as CCC trails would continue to be maintained. Impacts to historically significant tree rows, commemorative trees near the NCO Quarters, and CCC features would be avoided under each of the action alternatives. These activities, including maintenance and avoidance of resources, are consistent with the project objective to protect the park's cultural resources at Fort Hunt Park.

In addition, both action alternatives would seek to restore a historic sight line from Battery Robinson to the Potomac River. This would give visitors a compelling visual connection into Fort Hunt's past, aiding the site's interpretation while also contributing to the Park's cultural landscape resource. Approximately 5,500 square feet of vegetation, including an estimated 23 trees, would be removed in order to restore this view. Work could also include selective pruning and invasive, exotic vegetation removal to provide a filtered view to the river.

ALTERNATIVE 4 – INTERIOR VISITOR SERVICES

OVERVIEW

- Establish an enhanced visitor services zone, potentially including a visitor contact station, within Area C
- Consider construction of a new restroom in Area C
- The number of people accommodated by reservations for Picnic Pavilion C may be reduced; removal of pavilion would be contingent on further archeological study as well as determination of compatibility of uses

Under Alternative 4, NPS would establish a visitor services zone in Area C within the central portion of Fort Hunt Park, as depicted in Figure 7. This interior location could potentially include the construction of some type of visitor contact station. The key purpose of the proposed visitor services zone in this area would be to enhance interpretation and education of Fort Hunt Park's historic significance. For instance, the interpretive trail would link to Area C. This alternative builds on Alternative Concept 4 presented in June 2012, with the selected zone for siting of the visitor contact station identified to avoid areas of known sensitive resources and take advantage of previously disturbed areas.

In order to accommodate the new visitor services function within Area C, the number of people accommodated by reservations for Picnic Pavilion C may be reduced. Removal of the pavilion would be contingent on further archeological study as well as determination of compatibility of uses. As detailed in Common to All Action Alternatives, this plan only evaluates a new visitor contact station at a conceptual level. An additional planning and compliance process would be required before any specific decision be made regarding design, location and construction.

Should the option of limited removal and realignment of segments of the park's main loop road, as well as removal of Area E Restrooms and Parking Area (detailed above) be implemented as part of Alternative 4, part of the future design and siting of the visitor contact station would include consideration of co-locating a new restroom in Area C.

Interpretive Facilities

The proposed visitor services facilities would be located in Area C within the depicted zone and situated near the existing picnic areas, removed from the surrounding park's organized recreational activities. Such facilities could include a kiosk or a visitor contact station, providing information about the site and maps, as well as potentially providing archival storage, research space, office space, storage space, and exhibit space. The relatively secluded location within the park would help to emphasize a connection to the natural and historic elements of the interpretive experience. Facilities, such as a kiosk or visitor contact station, would help fulfill the key interpretive objectives of the project by providing a place to introduce visitors to the park's history and orient them to the site, with enhanced interpretation that utilizes the best available technology to present the various uses of Fort Hunt over time. Further study would be conducted with a future planning (and NEPA) process to determine the final design of the facility, which for this alternative would include the final size, components and exact location of the facility. Design of the visitor contact station would be appropriate for the park context and would meet the *Secretary of the Interior's Standards for Treatment of Historic Properties.*

The interpretive trail, as described in the Elements Common to Action Alternatives, would add approximately 6,200 linear feet of new walking trail intended to enhance the interpretive experience. A visitor contact station in Area C would be highly compatible with the conceptual chronological interpretive loop trail as it is situated at the intended beginning of the trail that uses the woodland backdrop to interpret the site's Native American history. The option for road realignment and removal of the Area E restrooms (which are closed seasonally) and parking area would benefit the ability to interpret the underlying resources that are within close proximity to the proposed visitor contact station zone.

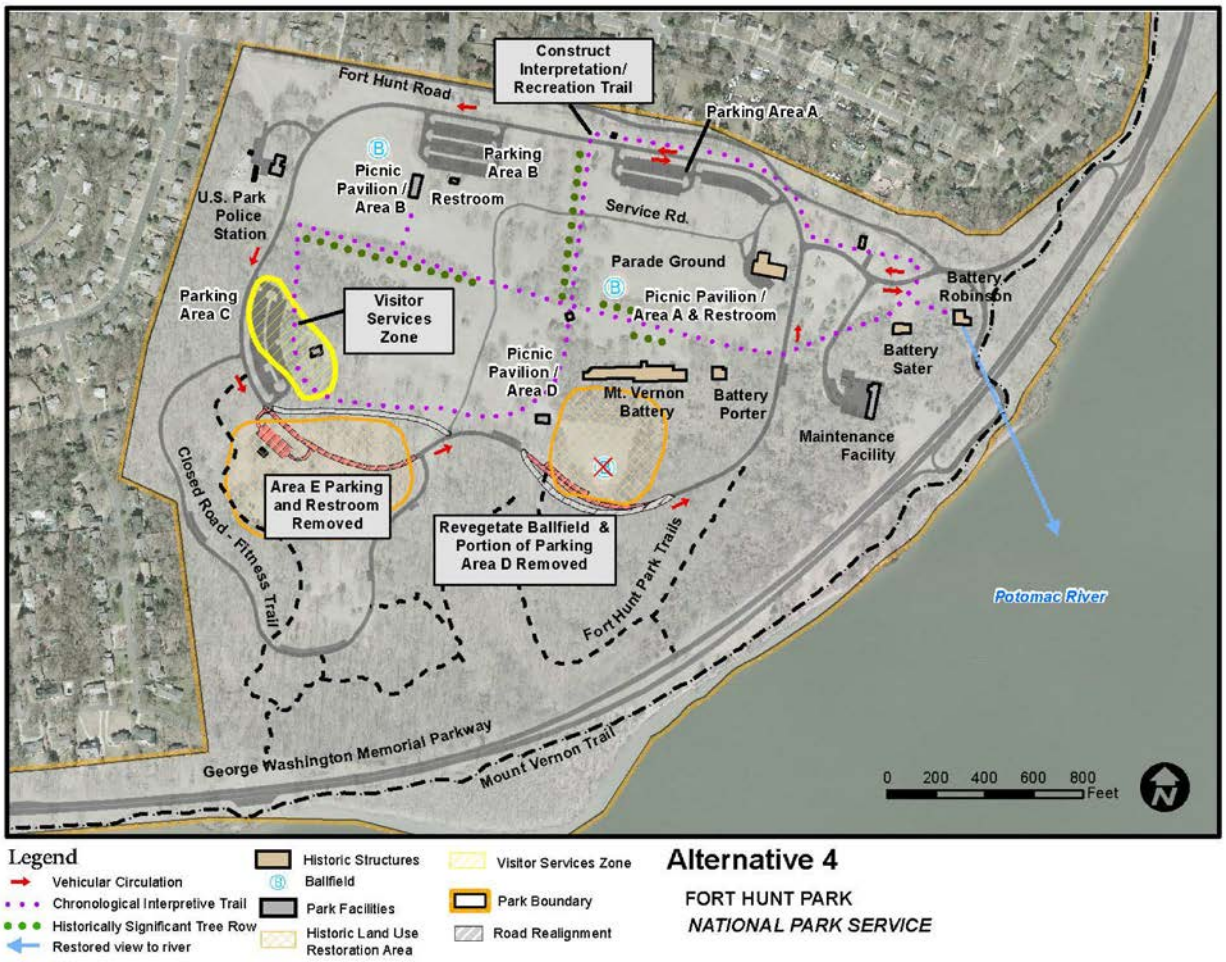

Figure 7. Alternative 4

Operational Considerations

New construction would be oriented to minimize ground disturbance and would occur in previously disturbed areas that have undergone archeological survey and in areas that are, to the extent feasible, void of mature vegetation. Archeological investigations would be conducted prior to land disturbance if construction is proposed in areas determined to have archeological potential. Consultation with VDHR and other consulting parties would continue for each construction project proposed under the action alternatives.

Prior to implementation of any specific elements outlined in the SDP, BMPs would be incorporated to avoid or minimize disruptions to natural and cultural resources. BMPs could include, but would not necessarily be limited to, tree protection measures, erosion and sediment control measures, construction staging, hand removal of vegetation as necessary, etc. Site drainage would be integrated with the existing storm sewer, and stormwater management measures would be implemented to improve the overall quality of the water that flows off the property.

All facility designs would incorporate universal design concepts to maximize accessibility for all visitors, including those with disabilities, to the greatest extent possible. New pedestrian facilities would meet

outdoor accessibility guidelines as outlined in the *Regulatory Negotiation Committee on Accessibility Guidelines for Outdoor Developed Areas: Final Report* (ATBCB 1999). All new or reconstructed routes to public facilities for individuals with disabilities would meet the *Architectural Barriers Act Accessibility Guidelines for Outdoor Developed Areas* (36 CFR Part 1191).

Sustainable design practices that follow principles established by the Leadership in Energy and Environmental Design (LEED®) and the Sustainable Sites Initiative (SSI) for planning of the architectural and site features would also be incorporated in the design or removal plans for park facilities. These practices would guide the implementation of individual projects toward lower-impact and more sustainable built environments. The overarching goal with locating new or reuse of existing facilities is to avoid and protect the cultural and natural resources including the cultural landscape, archeological resources, and the overall setting of Fort Hunt Park.

Recreational Facilities

Under Alternative 4, no picnic areas would be closed; however, reserved parking as part of permitted activities for picnic areas in Area C may be reduced. Removal of the pavilion would be contingent on further study and visitor contact station design, as well as determination of Area C carrying capacity and compatibility of uses. This location of a visitor contact station avoids impacts to the Picnic Pavilions A and B, which have higher capacities and are more popular.

As discussed in the Common to All Action Alternatives section, the interpretive trail would also serve as a safe off-road opportunity for walking, jogging, bird watching and other recreational uses. While the surface material and other specifications of the trail are yet to be determined, it would be designed as a pedestrian trail that would meet ADA standards for accessibility, but would not be intended for use by bicyclists.

The lower road would remain closed to vehicles in both action alternatives, ensuring its long-term use as a paved multi-use fitness trail that would continue to be a recreational resource for pedestrians and cyclists, in addition to potential enhancements discussed in Common to All Action Alternatives.

Falling within one of the Historic Land Use Restoration Areas, the ballfield in Area D and other flat grassy areas would be reprogrammed as multi-purpose recreation space in both action alternatives. The ballfields in Areas A and B would remain.

Vehicular and Pedestrian Circulation and Parking

Alternative 4 would include minimal physical changes to vehicular circulation and parking in the park. However, as detailed in the Common to All Action Alternatives section, each alternative includes the option for the limited removal and realignment of segments of the main loop road and the removal of the Area E parking area (approximately 32 spaces) and portion of Area D parking (approximately 20 spaces). Future design work would include consideration of ways to replace some of the parking spaces lost by utilizing previously disturbed areas, potentially including paved surfaces outside of the restoration areas set to be removed as part of the option.

Enhanced visitor service facilities in Area C would bring additional traffic around the full loop road that would affect vehicular circulation patterns. This will be further analyzed in Chapter 4.

The new interpretive trail included in both alternatives presents the largest change in pedestrian circulation. The trail would offer pedestrians an alternative to the bicycle/pedestrian lane of the loop road, for interpretation and recreation as well as general circulation around the park. In addition, the improvements to the lower shared-use trail (closed road) would also benefit pedestrian and bicycle circulation in that area of the park and provide an enhanced connection to the hiking trails.

In order to minimize ground disturbance, up to 50 to 100 of the existing 150 parking spaces in Parking Area C could be used for a visitor contact station. The number of parking spaces required would be determined during the design phase of the project. Remaining parking spaces would be retained for use by general park visitors. Similar to the roadway realignment options in the Common to All Action Alternatives section that remove Parking Area E and a portion of Area D, Alternative 4 would include consideration of ways to replace some of the parking spaces lost in Area C by utilizing previously disturbed areas, potentially including paved surfaces outside of the restoration areas set to be removed as part of the road realignment options.

Net changes to square feet of pavement under Alternative 4 would not be substantively different as compared to Alternative 1 (No Action Alternative) or Alternative 5. Future design work to implement proposed actions would seek to minimize new pavement and reduce paved surfaces where possible. Re-vegetation would follow a management process as appropriate, which could include seeding or planting with vegetation suitable to the location within the park and desired visitor use.

Historic Structures and Cultural Landscapes

Under Alternative 4, the NCO Quarters would continue to be mothballed and receive a future undetermined treatment that would be part of a separate planning effort, allowing the structure to be further included in Fort Hunt Park's historical interpretive experience. Treatments of other historic structures and cultural landscapes are described in Elements Common to Action Alternatives.

ALTERNATIVE 5 – GATEWAY VISITOR SERVICES

OVERVIEW

- Establish a visitor services zone near the entrance to Fort Hunt that could include the historic NCO Quarters and current office space in Pavilion A to support a visitor services function
- Construct an accessible pedestrian path from Parking Area A to NCO Quarters, including an at-grade crossing of the main loop road
- Reservations for Picnic Pavilion A would continue, but could conflict with additional demands on Area A parking

Alternative 5 is the NPS preferred alternative for site development Fort Hunt Park. The focus of Alternative 5 would be to enhance the visitor experience and interpretive facilities, ensure the long-term sustainability of facilities, and reduce the impact of the built environment on the area's natural and scenic resources as much as possible (Figure 8).

Under Alternative 5, NPS would establish a visitor services zone near the entrance to Fort Hunt Park. Under this alternative, the historic NCO Quarters could be rehabilitated and adaptively reused to serve a visitor services function that enhances site historic interpretation and visitor orientation, potentially as a visitor

facility. In addition, this alternative would expand the current parking area near the entrance to the NCO Quarters. Alternative 5 lessens the footprint of site development by reusing the NCO Quarters, an existing historic structure within the site that is in need of rehabilitation, and adapting it to be used as a visitor contact station. By locating the visitor contact station in Area A at the existing NCO Quarters, the visitor contact station would be sited away from the existing Area A pavilion, helping to avoid user conflicts between those using the pavilion and those utilizing the additional visitors services functions offered under Alternative 5. Additional methods to separate these user groups could include increased signage to direct visitors to their desired destinations within Area A.

Recent preliminary rehabilitation work has been completed on the structure, including lead and asbestos abatement. Additional building modifications required includes adding a new heating, ventilation, and air conditioning (HVAC) system and repair of interior finishes with minimal changes to the historic structure/fabric. The rehabilitation of the NCO quarters would include providing ADA accessibility into the main floor of the building. It is currently estimated that the structure would provide approximately 600 square feet of accessible space for visitor services. The remainder of the structure could be used for supporting uses for NPS staff (offices, etc.), totaling approximately an additional 600 square feet. Due to its associated costs, rehabilitating and adaptively reusing the NCO Quarters may need to be phased over time.

Operational Considerations

Beyond the NCO Quarters, Alternative 5 would rehabilitate a section of Pavilion A for reuse in order to support visitor services. Under the alternative, the interior spaces currently used for office space and storage by NPS staff at the rear of Pavilion A would be renovated in order to accommodate a visitor services function; the office space and storage currently in Pavilion A would be accommodated at the on-site maintenance facility. The renovated Pavilion A space could include the housing of archival and curatorial collections. Improvements to Pavilion A would include the creation of an ADA accessible ramp to the office space, as well an ADA accessible path to that ramp from the existing parking area. Facility designs would incorporate universal design concepts to maximize accessibility for all visitors, including those with disabilities, to the greatest extent possible. The design of the ADA accessible path and ramp to the proposed renovated interior spaces at the rear of Pavilion A would be developed in a manner to separate visitors utilizing the Pavilion from those utilizing the services in the rear of the structure.

Alternative 5 would also introduce smaller visitor facilities to the park. An interactive orientation kiosk could be installed near Pavilion A at the site of the previous Verizon phone booth. Additional visitor orientation information would be provided near parking areas B and C. Such orientation information would likely include signs that provide orientation and wayfinding for the site, as well as maps of the park. These signs and kiosk would be place in areas that have previously been disturbed.

An accessible pedestrian path, including an at-grade crossing of the main loop road, would be constructed to connect Parking Area A to the new interpretive loop trail and the NCO Quarters. The establishment of visitor services near the park entrance could place additional demands on Area A parking as a result of visitation to the new visitor services function in such close proximity to Area A.

Rehabilitation work on the NCO Quarters would be contingent on further archeological study as well as determination of compatibility of uses. As detailed in Common to All Action Alternatives, this plan only

evaluates enhancements to visitor services at a conceptual level. An additional planning and compliance process are required before any specific decision be made regarding design and construction.

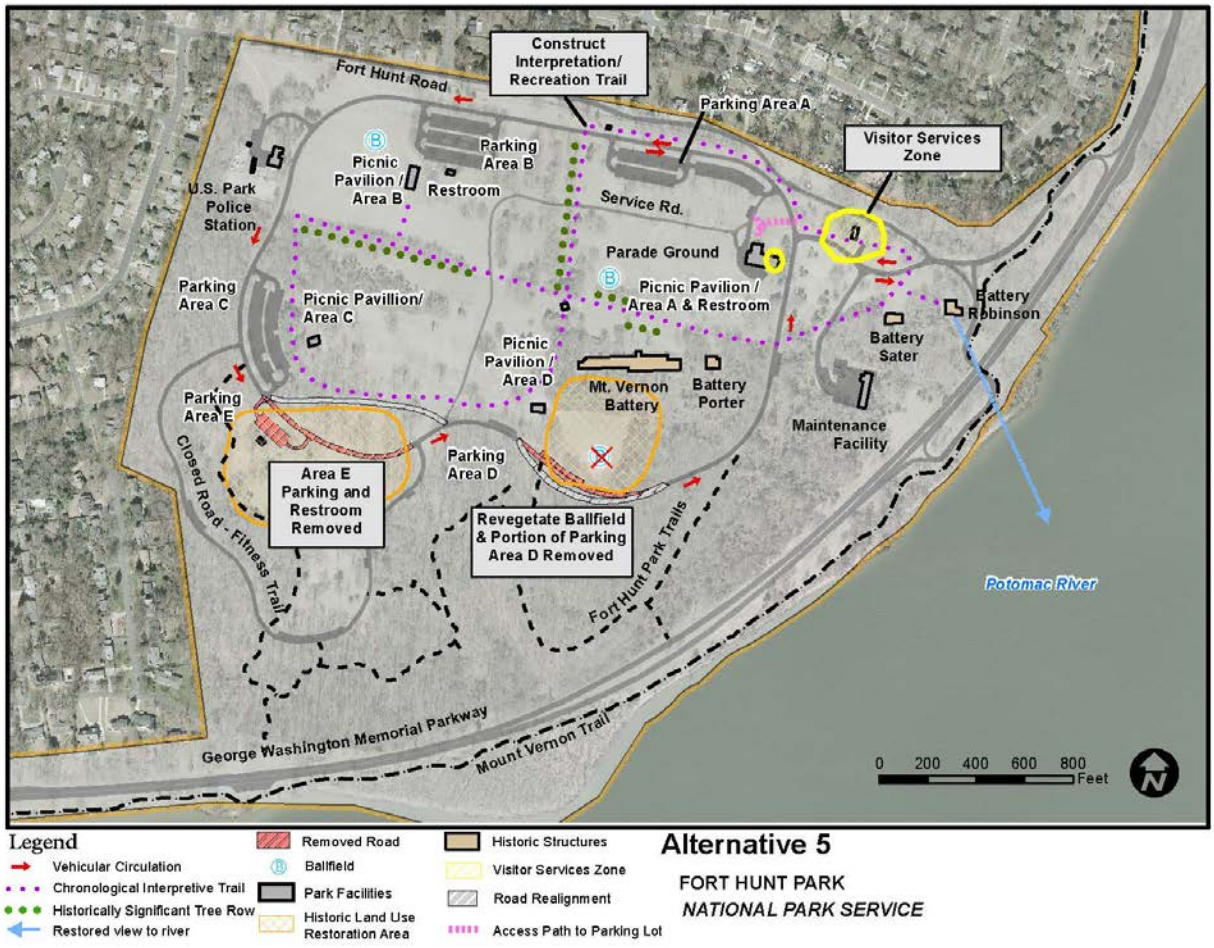

Figure 8. Alternative 5 (Preferred Alternative)

Interpretive Facilities

A visitor services zone near the entrance of the park would be highly visible and convenient for visitors. Specifically, a visitor contact station at the NCO Quarters would help fulfill the key interpretive objectives of the project. It would provide a place to introduce visitors to the park's history and orient them to the site, with enhanced interpretation that utilizes best available technology. Further planning and design would be required to determine the most effective and appropriate use of the building's relatively small footprint (approximately 600 square feet of accessible space for visitor services) to fulfill visitor service objectives while also respecting and rehabilitating the historic structure to the extent possible. Design would be appropriate for the park context and would meet the *Secretary of the Interior's Standards for Treatment of Historic Properties.*

The interpretive trail, as described in the Elements Common to Action Alternatives, would add approximately 6,200 linear feet of new pedestrian trail intended to enhance the interpretive experience. Outdoor exhibit space in front of the NCO Quarters would supplement trail waysides. While the NCO Quarters is not located

at the chronological beginning of the trail, it is directly adjacent to the trail. The location would still serve as an appropriate start for a visitor's interpretive experience on the trail, which could easily be adapted in future planning and design of waysides or other interpretive media relating to the trail. This location for the visitor contact station would also complement the visitor services functions of Area A, given its proximity to the high visitor use Picnic Pavilion A.

Recreational Facilities

Under Alternative 5, no picnic areas would be closed; however, the number of people accommodated by reservations for Picnic Pavilion A may be reduced. While the location of a visitor contact station in close proximity to Area A does provide complementary visitor services for picnic users, it would also bring in other park visitors who would increase demand on Area A's parking and restroom facilities.

As discussed above, the interpretive trail would also serve as a safe off-road opportunity for walking, jogging, bird watching and other recreational uses. While the surface material and other specifications of the trail are yet to be determined, it would be designed as a pedestrian trail that would meet ADA standards for accessibility, but not be intended for use by bicyclists.

The lower road would remain closed to vehicles in both action alternatives. This would ensure its long-term use as a paved multi-use fitness trail that would continue to be a recreational resource for pedestrians and cyclists, in addition to potential enhancements discussed in the Common to All Action Alternatives section.

Falling within one of the Historic Land Use Restoration Areas, the ballfield and other grassy areas in Area D would be reprogrammed as multi-purpose recreational space in both action alternatives. The ballfields in Areas A and B would remain.

Vehicular and Pedestrian Circulation and Parking

Alternative 5 would include very little physical changes to vehicular circulation and parking in the park. However, as detailed in the Common to All Action Alternatives section, each alternative includes the option for the limited removal and realignment of segments of the main loop road and the removal of the Area E parking area (approximately 32 spaces) and portion of Area D parking (approximately 20 spaces). Future design work would include consideration of ways to replace some of the parking spaces lost by utilizing previously disturbed areas.

Enhanced visitor service facilities in Area A would bring more traffic into the park; however, it would be anticipated that most additional traffic would not circulate the full loop road. This would concentrate more of vehicular circulation in the two-way section of road between the park entrance and Area A. This will be further analyzed in Chapter 4.

The new interpretive trail included in both alternatives presents the largest change in pedestrian circulation. The trail would offer pedestrians an alternative to the bicycle/pedestrian lane of the loop road for interpretation and recreation as well as general circulation around the park. In addition, the improvements to the lower shared-use trail (closed road) would also benefit pedestrian and bicycle circulation in that area of the park and provide an enhanced connection to the hiking trails. Alternative 5 also includes a new accessible path from Parking Area A to the NCO Quarters, with a pedestrian crossing of the main loop road.

Options would be considered to utilize the existing driveway adjacent to the NCO Quarters for use as an ADA accessible parking space. Additional spaces would be created in a small parking area near the existing driveway. The type and location of these spaces would be dependent upon additional archeological investigations.

Net changes to square feet of pavement under Alternative 5 would not be substantively different as compared to Alternative 1 (No Action Alternative) or Alternative 4. Future design work to implement proposed actions would seek to minimize new pavement and reduce paved surfaces where possible. Re-vegetation would follow a management process as appropriate, which could include seeding or planting with vegetation suitable to the location within the park and desired visitor use.

Historic Structures and Cultural Landscapes

Treatments of historic structures and cultural landscapes are described in Elements Common to Action Alternatives.

Table 1. Comparison of the Alternatives

Park Facility	Alternative 1 No-Action Alternative	Alternative 4 Interior Visitor Services	Alternative 5 Gateway Visitor Services (Preferred Alternative)	Alternatives 4 and 5 - Road Limited Removal and Realignment Option
Interpretive Facilities	• Visitors can explore exteriors of former gun batteries and Battery Commander's Station • Eight wayside exhibits interpret various aspects of site's history	• Enhanced visitor services function in Area C, with potential to construct visitor contact station within depicted zone • New interpretive trail constructed linking to Area C	• Enhanced visitor services function in NCO Quarters, potentially serving as visitor contact station • New interpretive trail constructed linking to Area C • Eight wayside exhibits interpret various aspects of site's history	• Enhanced options for interpretation within Historic Land Use Restoration Areas

Park Facility	Alternative 1 No-Action Alternative	Alternative 4 Interior Visitor Services	Alternative 5 Gateway Visitor Services (Preferred Alternative)	Alternatives 4 and 5 - Road Limited Removal and Realignment Option
Recreational Facilities	• Recreational facilities managed and maintained as they are today • Picnic Pavilions/ Areas A, B, C, and D available by reservation and Picnic Area E available on a first come basis • Bicycle/Pedestrian Trail as a shared lane provided on the loop road	• Potential reduction of picnic facilities in Area C, pending further study • Designated parking spaces for Picnic Area C permitted activities may be reduced • Potential construction of new restroom in Area C • Enhanced access, amenities, and fitness circuit on lower shared use trail (closed lower road) • Upgrade Area A playground • Ballfield in Area D reprogrammed for multi-purpose recreation • Enhanced walking/running opportunities on new interpretive trail • Eight wayside exhibits interpret various aspects of site's history	• No picnic areas would be closed; however, the number of people accommodated by reservations for Picnic Pavilion A may be reduced • Enhanced access, amenities, and fitness circuit on lower shared use trail (closed lower road) • Upgrade Area A playground • Ballfield in Area D reprogrammed for multi-purpose recreation • Enhanced walking/running opportunities on new interpretive trail • Eight wayside exhibits interpret various aspects of site's history	• Remove Area E restrooms

Park Facility	Alternative 1 No-Action Alternative	Alternative 4 Interior Visitor Services	Alternative 5 Gateway Visitor Services (Preferred Alternative)	Alternatives 4 and 5 - Road Limited Removal and Realignment Option
Vehicular Circulation and Parking	• Traffic circulates main loop road with two-way traffic from entrance to Area B and one-way for remainder of loop • Paved lower road closed to vehicular traffic • Parking provided at five lots, near picnic pavilions and areas	• Additional traffic on main loop road due to enhanced visitor facilities in Area C • Potential removal of Area C parking • Additional demands on Area D parking	• Additional traffic between park entrance and Area A due to enhanced visitor facilities in NCO Quarters • Additional demands on Area A parking	• Remove portion of Area D parking • Remove Area E parking • Remove and realign sections of loop road to avoid restoration areas • Consider ways to replace a portion of lost parking by utilizing disturbed areas
Historic Structures and Cultural Landscapes	• The gun batteries, Battery Commander's Station, Brick Storage Building and trails would continue to be maintained by the park • NCO Quarters would continue to be mothballed • Cultural landscape features such as the tree rows would not be impacted	• NCO Quarters would continue to be mothballed until future undetermined treatment • Restored sight line to Potomac River from Battery Robinson • Potential removal of up to 23 trees and invasive vegetation • Continuing efforts to remove invasive, exotic vegetation impacting cultural landscape	• NCO Quarters rehabilitated and adaptively reused to serve visitor services function • Restored sight line to Potomac River from Battery Robinson • Potential for the removal of up to 23 trees and invasive vegetation • Continuing efforts to remove invasive, exotic vegetation impacting cultural landscape	• Enhanced protection of Historic Land Use Restoration Areas

CONSTRUCTION AND STAGING

Additional planning related to construction and staging would take place as part of future planning/compliance process; however, it is assumed that construction equipment and materials would be staged at the existing maintenance facility. The use of this area would least impact park operations and visitor use and experience for the duration of construction activities.

MITIGATION MEASURES OF THE ACTION ALTERNATIVES AND OPTIONS

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 would be implemented as part of the selected action alternative. The NPS would 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.

Soils

It is NPS practice to comply with or exceed local and state water quality and erosion and sediment control regulations. During the design phase of the project, erosion and sediment control plans would be prepared in accordance with the appropriate state and county Erosion and Sediment Control requirements, as well as the EISA requirements with approval from the Commonwealth of Virginia. These plans would include specific measures and BMPs to avoid and/or minimize soil erosion and transport due to ground-disturbing activities such as grading. Such measures may include, but would not be limited to, stabilized construction entrances, silt fences, temporary sediment traps and filtering devices and earth dikes. These plans would be implemented during construction. Additionally, projects would develop a Stormwater Pollution Prevention Plan (SWPPP) and obtain coverage under Virginia's General Permit for the Discharge of Water from Construction Activities (Construction General Permit) in accordance with the requirements of the Virginia Department of Environmental Quality's (VADEQ) Stormwater Management Program. The Construction General Permit and SWPPP would specify additional measures for minimizing pollutants and sediments carried by stormwater from the project site. The erosion and sediment control plans, SWPPP, and Construction General Permit are common to all alternatives and would be implemented with the proposed action.

Vegetation

Protection measures and BMPs would be implemented to avoid impacts to all types of park vegetation to the extent possible. Vegetation protection measures would be detailed in the design phase of the project and may include, but would not be limited to: evaluation of large trees and development of a Tree Preservation Plan by an arborist or licensed tree expert; installation of tree protection fencing, root pruning for trees whose critical root zones (CRZs) lie within a proposed construction area; and staging construction equipment to avoid damage to park vegetation. All vegetation planting and seeding would fulfill NPS functional and aesthetic requirements. Areas planted following construction would be monitored to ensure successful establishment. Protection measures and BMPs are common to all alternatives and would be implemented with the proposed action. The loss of trees over 6 inches diameter at breast height (DBH), estimated to be

approximately 373 trees throughout the 157.4 acre park, would be mitigated on site based on park policy. This includes inch-for-inch replacement of trees. Areas within the park for tree plantings will be identified in consultation with GWMP natural and cultural resources staff.

Wildlife

Best management practices would be utilized to minimize impacts to terrestrial and aquatic habitats. Detailed tree save plans would be developed and implemented during construction to protect surrounding trees that form forest habitat for park wildlife. Erosion and sediment control plans would also be prepared and implemented to avoid and minimize potential impacts to aquatic habitat that could be caused by soil erosion and sediment transport. Tree save plans and erosion and sediment control plans are common to all alternatives and would be implemented with the proposed action.

All construction activities would comply with the Bald and Golden Eagle Protection Act. This Act requires that a buffer of 330 feet (100 meters) be maintained between activities and the bald eagle nest. All clearing, external construction, and landscaping activities within 660 feet (200 meters) of the nest would be conducted outside the nesting season (from August through January). Established landscape buffers would be maintained to screen the activity from the nest. Compliance with the Bald and Golden Eagle Protection Act is common to all alternatives and would be implemented with the proposed action.

Rare, Threatened, and Endangered Species

To avoid adverse impacts on the northern long-eared bat during the implementation of Alternative 5, the NPS would adhere to time-of-year restrictions for the removal of vegetation that could potentially provide summer roosting habitat for the species. Further, the NPS would conduct surveys for the northern long-eared bat, tri-colored bats, and little brown bats prior to implementing projects that could potentially disturb the species' winter hibernacula.

Archeology

Each individual project identified in the SDP (such as the visitor contact station including utilities, trails, road reconfiguration, etc.) would be evaluated for potential impacts to archeological resources once more detailed design information is available with regard to the location and size of each facility. The NPS would continue coordination with the VDHR, SHPO, and the Fairfax County Parks Department in accordance with Section 106 of the NHPA, as amended. The goal of consultation and identification is to avoid, minimize, or mitigate any potential effects to archeological resources. These actions are common to all alternatives and would be implemented with the proposed action.

Historic Structures and Districts / Cultural Landscapes

The design of the visitor contact station and other facilities outlined in the SDP 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 effects. Their design would be appropriate for the park context. Contributing landscape features would be avoided to the extent feasible in constructing the interpretive trail system, and the historic open spaces, including the parade ground, would be maintained. The NPS would continue coordination with the VDHR in accordance with Section 106 of the NHPA, as amended. As part of the continued coordination, a Memorandum of Agreement (MOA) or Programmatic Agreement (PA) would

be developed. Prior to implementing an action, an evaluation of National Register eligibility of park resources potentially significant for their association with the Mission 66 program, including the picnic pavilion at Area A; the Area C and E restrooms and associated ornamental plantings; the loop road, parking areas and other elements of the circulation system; and the ballfields would be conducted. These measures are common to all alternatives and would be implemented with the proposed action.

Cultural Landscapes

Plans for construction staging of equipment and materials would be developed in order to minimize impacts on views within the cultural landscape. Landscape plans would be developed considering the cultural landscape, and in accordance with NPS policies. As part of the continued coordination, a Memorandum of Agreement (MOA) or Programmatic Agreement (PA) would be developed. Prior to implementing an action, an evaluation of National Register eligibility of park resources potentially significant for their association with the Mission 66 program, including the picnic pavilion at Area A; the Area C and E restrooms and associated ornamental plantings; the loop road, parking areas and other elements of the circulation system; and the ballfields would be conducted. These actions are common to all alternatives and would be implemented with the proposed action.

Visitor Use and Experience

Signage would be used to notify park visitors of temporary closures or changes in traffic patterns. Additionally, plans for construction equipment and materials staging areas would be developed to cause the least disruption to park visitors. These actions are common to all alternatives and would be implemented with the proposed action.

ALTERNATIVES AND OPTIONS CONSIDERED BUT DISMISSED

The Council on Environmental Quality (CEQ) regulations for implementing NEPA require federal agencies explore and objectively evaluate all reasonable alternatives to the preferred alternative, and to briefly discuss the rationale for eliminating any alternatives that were not considered in detail. This section describes those alternatives that were eliminated from further study and documents the rationale for their elimination.

During the course of scoping and alternative development, several alternatives were considered but deemed to be unreasonable and were not carried forward for analysis in this EA. Some of these were determined to be unreasonable, or much less desirable than similar options included in the analysis, and were therefore not carried forward for analysis in this EA. Justification for eliminating these alternatives from further analysis was based on the following factors:

- Technical or economic feasibility.
- Inability to meet project objectives or resolve need.
- Duplication with other, less environmentally damaging or less expensive alternatives.
- Too great an environmental impact.

The following alternatives were considered but dismissed for the listed reasons.

INTERPRETIVE FACILITIES

Locate visitor contact station in Area A

Alternative Concept 2, presented to the public in 2012, proposed a visitor contact station within a zone in Area A. The visitor contact station located in this area was evaluated and was dismissed because providing a visitor contact station and its associated parking in this location would substantially impact the use of Picnic Pavilion A. Picnic Pavilion A offers the park's highest permitted user capacity and is also the most popular. The site also offers limited areas for construction that avoids potential resource damage without loss of parking.

Locate visitor contact station in Area B

Alternative Concept 3, presented to the public in 2012, proposed a visitor contact station in Area B within a zone that included Picnic Pavilion B. The visitor contact station located in this area was evaluated and it was dismissed because providing a visitor contact station in this area would require removal of Picnic Pavilion B (which offers the park's second largest permitted user capacity) and the Area B ballfield. This notable change of use in Area B would disrupt the existing recreation use of Area B, including an unacceptable loss of picnic and associated recreation opportunity for large groups. New construction in Area B would also visually impact a section of the park that currently benefits from relatively unadulterated open space.

Locate visitor contact station in Area D

This alternative proposed a visitor contact station in Area D. This proposal was determined to be counter to the plan's objective to establish the Historic Land Use Restoration Area in Area D. Building locations outside of the Area D restoration area would either be too detrimental to park resources and/or not technically feasible due to steep topography.

Locate visitor contact station south of the Picnic Area E

This alternative proposed a visitor contact station south of picnic Area E. The visitor contact station located in this area was evaluated and was dismissed because providing a visitor contact station and its associated parking would substantially impact well-preserved natural resources in the area. It was also determined that this location may not be technically feasible for building given steep topography.

RECREATIONAL FACILITIES

Remove Picnic Pavilions

The 2011 EA proposed removal of all but one picnic pavilion in every action alternative to help protect resources and balance park recreational use and historic interpretation. The public reacted in strong opposition to such a dramatic reduction of recreational facilities at the park, promoting the local and regional importance of the pavilions for many individuals and groups. Responding to public feedback and further consideration of impacts to visitor use, NPS has dismissed removal of picnic pavilions. While this EA does not focus on management actions, it does recommend consideration of changes to the picnic permitting program, including reductions of maximum group size.

VEHICLE AND PEDESTRIAN CIRCULATION AND PARKING

Reroute loop road through reopened lower road

This option, presented in the 2011 EA as well as in 2012 scoping, proposed reopening the closed lower road to accommodate the rerouted main loop road that avoids the restoration area north of Area E. This alternative has been dismissed due to public concern over possible security issues for adjacent neighbors; support for existing recreational use for pedestrians and bicycles; and NPS concern over tree loss that would be associated with necessary realignments and clearing along road shoulders to bring the roadway back to safety standards.

Changes to loop road configuration and separated bicycle/pedestrian loop trail

The 2011 EA proposed several substantial changes to the park's loop road configuration. These changes were deemed unnecessary due to revised project objectives that sought to retain existing uses to the extent possible and to the new alternative's placement of enhanced visitor facilities. The associated cost and resource impacts with previously considered changes to road configuration was also a serious consideration, leading to the lower cost/impact road realignment options included in this EA. A separated bicycle/pedestrian loop trail was also dismissed for similar reasons; in addition to lack of need should the dedicated bicycle/pedestrian lane of the loop road remain.

HISTORIC STRUCTURES AND CULTURAL LANDSCAPES

Restore view to river from Battery Sater

This option, presented to the public in 2012, was proposed to evaluate the possibility of restoring a view to the Potomac River from either Battery Sater or Battery Robinson to enhance the visitor connection to historic uses of the site. However, following public comments of concern and subsequent site investigations by park staff, it was determined that the vegetation clearing required to restore a view from Battery Sater would be an unacceptable adverse impact to natural resources and therefore dismissed.

MAINTENANCE FACILITY

Relocate Maintenance Facility outside of park

This alternative would move the maintenance facility outside the park either to the south or north of Alexandria, VA. The NPS maintains the Parkway and utilizes this maintenance facility to store the vehicles and salt necessary to clear the Parkway during snowstorms. The NPS also uses this facility to maintain Fort Hunt Park. This alternative was dismissed as the park determined that keeping the maintenance operations south of Alexandria, VA was critical during snow storms as the snow plows need to be able to clear and maintain the roads during inclement weather. During later discussions it also became evident that the park maintenance staff preferred to have the maintenance inside the park for the purpose of maintaining the grounds at Fort Hunt. Therefore, the relocation of the facility was dismissed from consideration as part of this site development plan. If determined appropriate in the future, the relocation of the existing maintenance facility would be addressed in an additional compliance (including NEPA) process.

Relocate Maintenance Facility to southwest corner of Fort Hunt Park

This alternative would move the maintenance facility to an area in the southwest corner of Fort Hunt Park with access from River Farm Drive. This alternative was not retained because of natural resources impacts and concerns that park operations such as snow removal activities would have impacts on adjacent residential properties. Therefore, the relocation of the facility was dismissed from consideration as part of this site development plan. If determined appropriate in the future, the relocation of the existing maintenance facility would be addressed in an additional compliance (including NEPA) process.

Co-locate the Maintenance Facility with the U.S. Park Police

This alternative would move the maintenance facility adjacent to the U.S. Park Police facility and they would have a shared access drive. This alternative was dismissed as the park determined that the area north of the police facility had archeological significance and the placement of the facility in this location would potentially impact historic resources. Therefore, the relocation of the facility was dismissed from consideration as part of this site development plan. If determined appropriate in the future, the relocation of the existing maintenance facility would be addressed in an additional compliance (including NEPA) process.

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 the 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 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 Alternative 5 as the environmentally preferable alternative in this EA because it best meets the definition established by the CEQ.

Alternative 5 best balances resource protection while achieving the desired visitor experience by managing park use and providing facilities to help the NPS to carry out its mission. Alternative 5 positions the visitor services zone in a more desirable location for interpretation, offering the greatest benefit for resource protection and visitor experience when compared to Alternative 4. Alternative 5 best fulfills the NPS responsibility as trustee of the environment for succeeding generations because the plan identifies improvements to interpretation of cultural resources while maintaining recreation facilities with less disturbance of soils and vegetated areas than Alternative 4.

The addition of the visitor contact station in combination with maintaining the number of permitted picnicking areas allows the NPS to attain the widest range of beneficial uses. The environmentally preferred alternative balances this use with other types of recreational uses at the park as well as resource protection. Furthermore, Alternative 5 preserves important historic, cultural, and natural aspects of our national heritage and supports diversity and variety of choice. Alternative 5 repurposes existing facilities and provides resource protection to enhance Fort Hunt Park and allows the NPS to better tell the story of the site's rich history.

Alternative 5 achieves a balance between population and resource use that promotes a high standard of living and a wide sharing of life's amenities. Again, Alternative 5 seeks a balance between visitor uses. When compared to Alternative 4, Alternative 5 would maintain the most recreation facilities and amenities while offering new interpretive opportunities. Alternative 5 provides the best balance between uses and promotes a high standard of living.

When compared to Alternative 4, Alternative 5 best meets the national environmental policy as expressed in NEPA Section 101 for the reasons described above; thus, Alternative 5 is the environmentally preferable alternative.

A summary of the environmental consequences follows in Table 2. The full analysis for each impact topic is found in Chapter 4. Please note that the environmental consequences for Alternatives 4 and 5 take into consideration the potential impacts resulting from the Road Limited Removal and Realignment Option.

Table 2: Summary of Environmental Consequences

Impacted Resource	**Alternative 1 No-Action Alternative**	**Alternative 4 Interior Visitor Services**	**Alternative 5 Gateway Visitor Services (Preferred Alternative)**
Soils	The No Action Alternative would have long-term minor adverse impacts on soils due to soil compaction and erosion. The No Action Alternative would have long-term minor adverse cumulative impacts on soils.	Alternative 4 with mitigation would have minor short-term construction-related impacts on soils due to construction. Alternative 4 would have minor long-term adverse impacts on soils due to soil disturbance and an increase in impervious surfaces. Alternative 4 would contribute to cumulatively minor adverse soil impacts.	Alternative 5 with mitigation would have minor short-term construction-related impacts on soils due to construction. Alternative 5 would have minor long-term adverse impacts on soils due to soil disturbance and an increase in impervious surfaces. Alternative 5 would contribute to cumulatively minor adverse soil impacts.
Vegetation	The continuation of native vegetation management practices under the No Action Alternative would result in no impacts on vegetation.	Short-term adverse impacts on vegetation due to construction of loop road. Alternative 4 would be mitigated to negligible levels. Alternative 4 projects would have negligible long-term impacts on vegetation. Alternative 4 would not contribute to adverse cumulative impacts on vegetation.	Short-term adverse impacts on vegetation due to construction of loop road. Alternative 5 would be mitigated to negligible levels. Alternative 5 projects would have negligible long-term impacts on vegetation. Alternative 5 would not contribute to adverse cumulative impacts on vegetation.
Wildlife	The No Action Alternative	Alternative 4 would have	Alternative 5 would have

Impacted Resource	**Alternative 1 No-Action Alternative**	**Alternative 4 Interior Visitor Services**	**Alternative 5 Gateway Visitor Services (Preferred Alternative)**
	would have no short-term or long-term impacts on wildlife and its habitat, and no adverse cumulative impacts.	negligible short- and long-term impacts on wildlife and its habitat. There would be no adverse cumulative impacts on wildlife and its habitat.	negligible short- and long-term impacts on wildlife and its habitat. There would be no adverse cumulative impacts on wildlife and its habitat.
Rare, Threatened , and Endangered Species	The No Action Alternative would have no short-term or long-term impacts on rare, threatened, and endangered species, and no adverse cumulative impacts.	Alternative 4 would have no short-term, long-term, or cumulative adverse impacts on rare, threatened, and endangered species.	Alternative 5 would have no short-term, long-term, or cumulative adverse impacts on rare, threatened, and endangered species.
Historic Structures	Under the No Action Alternative, no change to current management strategies or uses would occur. The No Action Alternative would result in long-term minor adverse impacts to historic structures and districts. The alternative would also result in long-term minor adverse cumulative impacts on historic structures and districts.	The removal of potentially-contributing features within the landscape could result in moderate adverse impacts on the Fort Hunt Park historic district. The creation of open views where historic views have been overgrown would be beneficial. Overall, Alternative 4 would have long-term beneficial impacts and potentially moderate adverse impacts on the Fort Hunt Park historic district and negligible impacts on the GWMP and Mount Vernon Memorial Highway historic districts. Alternative 4 would result in beneficial and moderate adverse cumulative impacts.	The removal of potentially-contributing features within the landscape could result in moderate adverse impacts on the Fort Hunt Park historic district. Alternative 5 would adaptively reuse the historic NCO Quarters and would remove some non-contributing elements of the park. Alternative 5 would result in short- and long-term moderate adverse impacts and long-term beneficial impacts on the Fort Hunt Park historic district and negligible impacts on the GWMP and Mount Vernon Memorial Highway historic districts. Alternative 5 would result in long-term moderate adverse and beneficial cumulative impacts on Fort Hunt Park historic district.
Cultural Landscapes	The No Action Alternative would have long-term minor adverse impacts due to slow deterioration caused by ongoing visitor use and weathering. The No Action Alternative	The removal of non-contributing features, the restoration of historic views, and the reuse of trail beds would result in beneficial impacts to the cultural landscape of Fort	The removal of non-contributing features, the restoration of historic views, and the reuse of trail beds would result in beneficial impacts to the cultural landscape of Fort

Impacted Resource	**Alternative 1 No-Action Alternative**	**Alternative 4 Interior Visitor Services**	**Alternative 5 Gateway Visitor Services (Preferred Alternative)**
	would have long-term minor cumulative impacts to cultural landscapes.	Hunt Park. Alternative 4 would remove potentially-contributing features and add new facilities in the Visitor Services Zone and new trails. Alternative 4 would have a long-term beneficial and could have moderate adverse impacts on the cultural landscape of Fort Hunt Park. Alternative 4 would have long-term beneficial and moderate adverse cumulative impacts on cultural landscapes.	Hunt Park. The addition of new facilities, parking, and repurposing of the NCO Quarters in the Visitor Services Zone and new trails, and the removal of potentially- contributing features, would have a minor adverse impact. As a result, Alternative 5 would have long-term beneficial and minor adverse cumulative impacts on cultural landscapes.
Archeological Resources	The No Action Alternative would not construct new facilities within Fort Hunt Park and would result in long-term minor adverse impacts to archeological and long-term minor adverse cumulative impacts.	Under the Alternative 4, construction activities could result in moderate impacts on archeological features at Fort Hunt Park. Alternative 4 could result in long-term moderate adverse cumulative impacts on archeological resources.	Under the Alternative 5, construction activities could result in moderate impacts on archeological features at Fort Hunt Park. Alternative 5 could result in long-term moderate adverse cumulative impacts on archeological resources.
Visitor Use and Experience	Alternative 1 would not alter the existing visitor use at the site and Alternative 1 would result in negligible long-term adverse impacts on visitor use and experience. Alternative 1 would result in long-term minor adverse cumulative impacts on visitor use and experience.	Alternative 4 would provide visitor facilities and interpretation, and reduce picnic capacity and parking. Overall, Alternative 4 would result in long-term beneficial impacts through increased interpretation and moderate adverse impacts due to the reduction in picnic areas and parking. Short-term minor adverse impacts would occur during construction. Alternative 4 would result in short-term minor and long-term beneficial and moderate adverse cumulative impacts on visitor use and experience.	Alternative 5 would provide visitor facilities and interpretation, and reduce parking; no changes to picnic facilities would occur, resulting in long-term beneficial impacts through increased interpretation and minor adverse impacts due to the potential increase in parking demand near picnic areas. Short-term minor adverse impacts would occur during construction. Alternative 5 would result in short-term minor and long-term beneficial and minor adverse cumulative impacts on visitor use and experience.

CHAPTER 3 : AFFECTED ENVIRONMENT

SOILS

NPS management policy with regard to soils is to actively seek to understand and preserve the soil resources of parks, and to prevent, to the extent possible, the unnatural erosion, physical removal, or contamination of the soil or its contamination of other resources (NPS 2006). To enact this policy, the NPS utilizes soil survey data from the NRCS. Sixteen soil map units are identified by the Natural Resources Conservation Service (NRCS) within Fort Hunt Park.

Fort Hunt Park is located in the coastal plain physiographic province. The coastal plain province consists of unconsolidated sand, silt, clay, and gravel strata deposited by ancient oceans and freshwater rivers. The overall drainage is to the southeast. Elevations at Fort Hunt Park range from mean sea level (MSL) to approximately 50 feet above MSL.

Soils at Fort Hunt Park include upland soils, hydric soils, and alluvial/floodplain soils. Existing features such as picnic shelters, ballfields, and historic structures are generally located in areas of upland soils. Alluvial/floodplain related soils occur closer to the Potomac River and a small tributary in the southeast part of the project area.

Hydric soils occur within Fort Hunt Park. Among the properties of soils, hydric rating is used in land use planning, conservation planning, and assessment of potential wildlife habitat. Hydric soils are a key component of wetlands, which are primarily regulated by the U.S. Army Corps of Engineers (USACE), as well as other federal government agencies. The NRCS has defined hydric soils as those soils that are sufficiently wet in the upper portions to develop anaerobic conditions during the growing season (USDA NRCS n.d. a). A national list of hydric soils is maintained by the NRCS. In addition to soils classified as hydric, the list also includes soils that are not hydric but contain hydric inclusions.

Portions of Fort Hunt Park have been graded to accommodate previous and existing uses. Some soils have been compacted by the creation of recreational trails throughout the park. Otherwise, high use areas and slopes within the study area show areas of limited erosion, particularly in areas lacking woody riparian vegetation.

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. Among the shade trees are mature pin oaks (*Quercus palustris*), tulip poplars (*Liriodendron tulipifera*), and red maples (*Acer rubrum*). Trails and roadways in the maintained portions of Fort Hunt Park are bordered by red maples.

Deciduous forest stands and disturbed areas are located along the George Washington Memorial Parkway (GWMP) and extend inward to the park's landscaped areas. In the south and west portions of Fort Hunt Park, mid-successional deciduous forest resources were observed, consisting of mature pin oaks, red oaks (*Quercus*

falcata), and sycamores (*Platanus occidentalis*). The forest understory includes an abundance of American holly (*Ilex opaca*) along with invasive species such as Japanese honeysuckle (*Lonicera japonica*), multiflora rose (*Rosa multiflora*), English ivy (*Hedera helix*), and wintercreeper (*Euonymus fortunei*).

Early-successional disturbed areas occur in the southeast and east portions of the park. These are areas which were once maintained, but have since been overgrown by weeds and woody vines. In general, the areas lie on the hillsides in front of the four gun batteries. Common plant species within this area include non-native species such as multiflora rose and Japanese honeysuckle. Scattered dead trees occur in these areas, which appear to have been overgrown with vines. A few large trees are interspersed in the disturbed areas.

A tree survey conducted in May 2015 for the area between Batteries Sater and Robinson, approximately 150 feet into the wooded area, indicated that the tree species red maple, pignut hickory (*Carya glabra*), serviceberry (*Amelanchier laevis*), American elm (*Ulmus americana*), eastern redcedar (*Juniperus virginiana*), willow oak (*Quercus phellos*), sweetgum (*Liquidambar styraciflua*), black locust (*Robinia pseudoacacia*), and sassafras (*Sassafrass albidum*) are found in the area. The tree sizes present are identified below in Table 3. The same May 2015 tree survey indicated that the area near the loop road directly south of Mount Vernon Battery has a slightly different makeup. The dominant tree species in this area includes red maple, American holly (*Ilex opaca*), tulip poplar, blackgum (Nyssa sylvatica,), and pin oak.

Table 3 Tree Survey Sample

	Total Number of Trees per Acre	Percentage of Trees by Diameter				
		2-5.9”dbh	6-11.9”	12-19.9”	20-29.9”	30”+
Sample 1 (between Batteries Sater and Robinson)	180	27	44	6	17	6
Sample 2 (south of loop road due south of Mount Vernon Battery)	220	24	52	5	14	5

No federally listed threatened or endangered plant species were identified in an online query of the U.S. Fish and Wildlife Service’s database of such species.

WILDLIFE AND ITS HABITAT

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 and other wildlife. Species that are likely to be present within the study area include white-tailed deer (*Odocoileus virginianus*), northern gray squirrel (*Sciurus carolinensis*), eastern chipmunk (*Tamias striatus*), eastern cottontail (*Sylvilagus floridanus*), raccoon (*Procyon lotor*), Virginia opossum (*Didelphis virginiana*), American robin (*Turdus migratorius*), American crow (*Corvus brachyrhynchos*), European starling (*Sturnus vulgaris*), mourning dove (*Zenaida macroura*), red-eyed vireo (*Vireo olivaceus*), wood thrush (*Hylocichla mustelina*), pileated woodpecker (*Dryocopus pileatus*), house sparrow (*Passer domesticus*),

northern cardinal (*Cardinalis cardinalis*), eastern bluebird (*Sialia sialis*), and various species of small rodents (NPS 2008b).

A sparsely vegetated, sandy area between Parking Area B and the baseball field contains a colony of ground nesting bees that includes some bee species not found elsewhere within GWMP. This bee colony is parasitized by the blister beetle (*Tricrania sanguinipennis*) and is the only site known in GWMP for this species. The oblique-lined tiger beetle (*Cicindela tranquebarica*) is also known in GWMP from only near this site. Fifteen species of ground beetles (*Carabidae spp*.) were also documented from Fort Hunt Park, including the first Virginia record of *Pterostichus sculptus* (Steury, B.W. and P.W. Messer 2014).

Forested wetlands are located in the southern portions of Fort Hunt Park. Wetland habitat is critical to the survival and life cycle of many wildlife species. Wetlands provide unique values to wildlife such as bird nesting sites, fish spawning grounds, resting stopover sites for migratory birds, and shelters for prey animals. Potential wetland species within the study area include crayfish (*Cambarus spp*.), green frog (*Rana clamitans*), American toad (*Bufo americanus*), box turtle (*Terrapene carolina*), muskrat (*Ondrata zibethicus*), and beaver (*Castor canadensis*). Fort Hunt is also utilized as a stopover location for migratory forest birds. Migratory species observed at Fort Hunt include the scarlet tanager (*Piranga olivacea*), black-throated blue warbler (*Dendroica caerulescens*), yellow-rumped warbler (*Dendroica coronata*), Acadian flycatcher (*Empidonax virescens*), and red-eyed vireo (*Vireo olivaceus*).

RARE, THREATENED, AND ENDANGERED SPECIES

The Endangered Species Act of 1973 (16 U.S.C. §1531 et seq.) provides for the protection of ecosystems upon which threatened and endangered species of fish, wildlife, and plants depend. Section 7 of the Endangered Species Act requires federal agencies to ensure that any action authorized, funded, or carried out by them is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Pursuant to the Act, NPS policy is to "proactively conserve listed species and prevent detrimental effects on these species" (NPS 2006).

The Virginia Department of Conservation and Recreation, Division of Natural Heritage maintains inventories of rare, threatened and endangered species, and rare or state significant natural communities. These inventories include threatened and endangered species listed at the federal level as well as species unique to the Commonwealth of Virginia.

The Bald and Golden Eagle Protection Act prohibits the taking, possession, and commerce of bald and golden eagles, their eggs or parts unless authorized by a permit issued by the U.S. Fish and Wildlife Service. Similarly, the Migratory Bird Treaty Act of 1918 prohibits the taking, killing, or possession of migratory birds, including bald eagles. The U.S. Fish and Wildlife Service is responsible for implementing the policies of these acts.

Northern Long-eared Bat

The northern long-eared bat (*Myotis septentrionalis*) was added to the federal endangered species list in May 2015. During winter, northern long-eared bats hibernate in the small crevices and cracks of caves, mines or other areas with constant temperatures, high humidity and no air currents. Northern long-eared bats roost singly or in colonies underneath bark, in cavities or in crevices of both live and dead trees during the summer. Males and non-reproductive females may also roost in caves and mines during the summer. The range of the

northern long-eared bat covers 37 states in the eastern and north central United States, including Virginia (USFWS 2015a). The northern long-eared bat was listed as threatened primarily due to the threat of white nose syndrome, a fungal disease that invades the skin of hibernating bats and disrupts their hydration and hibernation cycles (BCI 2015).

The echolocation call of a northern long-eared bat was recorded along the northern end of the GWMP during a bat survey conducted for the NPS from 2003 to 2005 (NPS CUE 2005). No specimens were recorded or physically observed at Fort Hunt Park. During an online query of the U.S. Fish and Wildlife Service's database of federally listed threatened and endangered species, the northern long-eared bat was identified as having the potential to occur at Fort Hunt Park.

The NPS has initiated consultation with USFWS with regard to the northern long-eared bat for the proposed projects at Fort Hunt Park as well as planned projects for other NPS parks in the National Capital Region.

Tri-colored Bat and Little Brown Bat

The tri-colored bat (*Perimyotis subflavus*) (also known as the eastern pipistrelle) and the little brown bat (*Myotis lucifugus*) were observed at Fort Hunt Park during the above-mentioned bat survey conducted from 2003 to 2005 (NPS CUE 2005). Both species are listed on the Virginia rare species watch list as S3 (vulnerable: at moderate risk of extirpation from the state due to a restricted range, relatively few populations [often 80 or fewer], recent and widespread declines, or other factors) and G3 (vulnerable: at moderate risk of extinction due to a restricted range, relatively few populations [often 80 or fewer], recent and widespread declines, or other factors). Tri-colored bats and little brown bats could potentially use the inside of batteries at Fort Hunt Park as hibernacula (i.e., hibernating locations), and trees may serve as roosting sites (VA DCR 2013) Some males and non-reproducing females may also roost in their winter hibernaculum (MN DNR, n.d.).

Bald Eagles

A bald eagle (*Haliaeetus leucocephalus*) nest has been documented in a densely wooded area on the eastern side of Fort Hunt Park near the GWMP (CCB 2015). Although de-listed from the Federal Endangered Species List in 2007, bald eagles are still protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act of 1918, as noted above.

If a proposed activity is not within sight of an active bald eagle nest, the USFWS recommends maintaining, at minimum, a 330-foot (100-meter) buffer between the nest and the activity to avoid disturbing the nesting eagles and their breeding or feeding patterns. If a similar activity is closer than 330 feet, a buffer equivalent to the distance between the nest and the existing tolerated activity must be maintained. During nesting season, the USFWS recommends maintaining a 660-foot (200-meter) buffer for clearing, construction, landscaping, and other earth-disturbing activities. The nesting season for bald eagles in the Chesapeake Bay region (which includes Fort Hunt Park) runs from mid-December to June (USFWS 2015b). Such activities may be conducted within the 660-foot buffer during those months not considered part of the nesting season.

Portions of the Area D ballfield re-vegetation area and the re-aligned loop road in Area D fall within the 660-foot buffer associated with the bald eagle nest at Fort Hunt Park. Due to the dense vegetation between the nest and these project sites, it is unlikely that the proposed activities would be visible from the nest. However, there is an area at the bend in the road past the ballfield where the nest is visible.

CULTURAL RESOURCES

Guiding Regulations and Policies

Section 106 of the NHPA requires that federal agencies take into account the effects of their actions on historic properties. Under this provision, the NPS must evaluate effects to any district, site, building, structure, or object listed in or eligible for listing in the NRHP. Cultural resources are characterized as archeological resources, historic structures, and cultural landscapes. Historic properties as defined by the implementing regulations of the NHPA (36 CFR 800), are any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP. This term includes artifacts, records, and the remains that are related to and located within such properties, as well as traditional and culturally significant Native American sites and historic landscapes. The term "eligible" for inclusion on the NHRP includes both properties formally determined eligible and all other properties that meet NHRP listing criteria. Agencies must consult with the SHPO and the Advisory Council on Historic Preservation (ACHP) as required, and other interested parties in an effort to avoid, minimize, or mitigate adverse effects.

In addition to the NHPA, protection and management of cultural resources held by the NPS is governed by *Directors Order #28: Cultural Resources Management Guidelines* (NPS 1988a), NPS Management Policies (2006), and the 2008 NPS-wide Programmatic Agreement with the ACHP and the National Conference of State Historic Preservation Officers. These documents require that NPS managers avoid or minimize adverse impacts on park resources to the greatest extent possible.

The significance of historic properties is generally judged against a property's ability to meet at least one of the following four criteria for inclusion on the NHRP (36 CFR 60):

A. Association with events that have made a noteworthy contribution to the broad patterns of our history; or

B. Association with the lives of persons important in our past; or

C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent an important and distinguishable entity whose components may lack individual distinction; or

D. That has yielded, or may be likely to yield, information important in prehistory or history.

Properties may be eligible for the NHRP for contributions at the national, state, or local level. Ordinarily, properties achieving significance within the last 50 years are not considered eligible unless they are parts of historic districts or unless they are of exceptional importance. The most common types of properties less than 50 years old listed on the NHRP are works of modern architecture or scientific facilities. Additionally, in order for a structure or building to be listed on the NHRP, it must possess historic integrity of those features necessary to convey its significance (i.e., location, design, setting, workmanship, materials, feeling, and association). For more information see NHRP Bulletin #15, How to Apply the National Register Criteria for Evaluation (NPS 1990).

Area of Potential Effects

For the proposed undertaking, the Area of Potential Effect (APE) is defined by the Fort Hunt Park boundary on the landward side of the GWMP. The historic structures located within the APE are presented in Figure 9 and are described in the following sections. The preliminary APE was determined by the visual influence of proposed actions identified in the SDP.

HISTORIC STRUCTURES AND DISTRICTS

This section addresses historic properties present that have been included in or have been determined eligible for the NRHP as buildings or historic districts. The Fort Hunt Site Development Plan and EA/AoE has the potential to affect three historic districts listed in the NRHP: Fort Hunt Park Historic District, the George Washington Memorial Parkway Historic District, and the Mount Vernon Memorial Highway Historic District.

Historic Districts within the APE

Fort Hunt Park, a unit of GWMP, was listed as an historic district in the NRHP on March 26, 1980. The district is significant under Criterion A for its association with military history (NPS 1980).

The park, sited on a portion of land once occupied by George Washington's River Farm, began its extensive military history in the late 1880s when the location – then known as Sheridan's Point – was identified by President Grover Cleveland's Endicott Board as a strategic position for a coastal artillery battery to defend the nation's capital (Laird 2000). The board, charged with assessing the nation's outdated coastal defenses during the era, chose the location to complement Fort Washington, first completed in 1809 on the opposing bank of the Potomac River and replaced in 1824. Together, the batteries were intended to repel a seaborne attack. The defensive complex of batteries erected on the site was one of a series of seacoast defenses devised by the board; now known as the Endicott System, these defenses were built between 1889 and 1910, to guard 26 major U.S. ports.

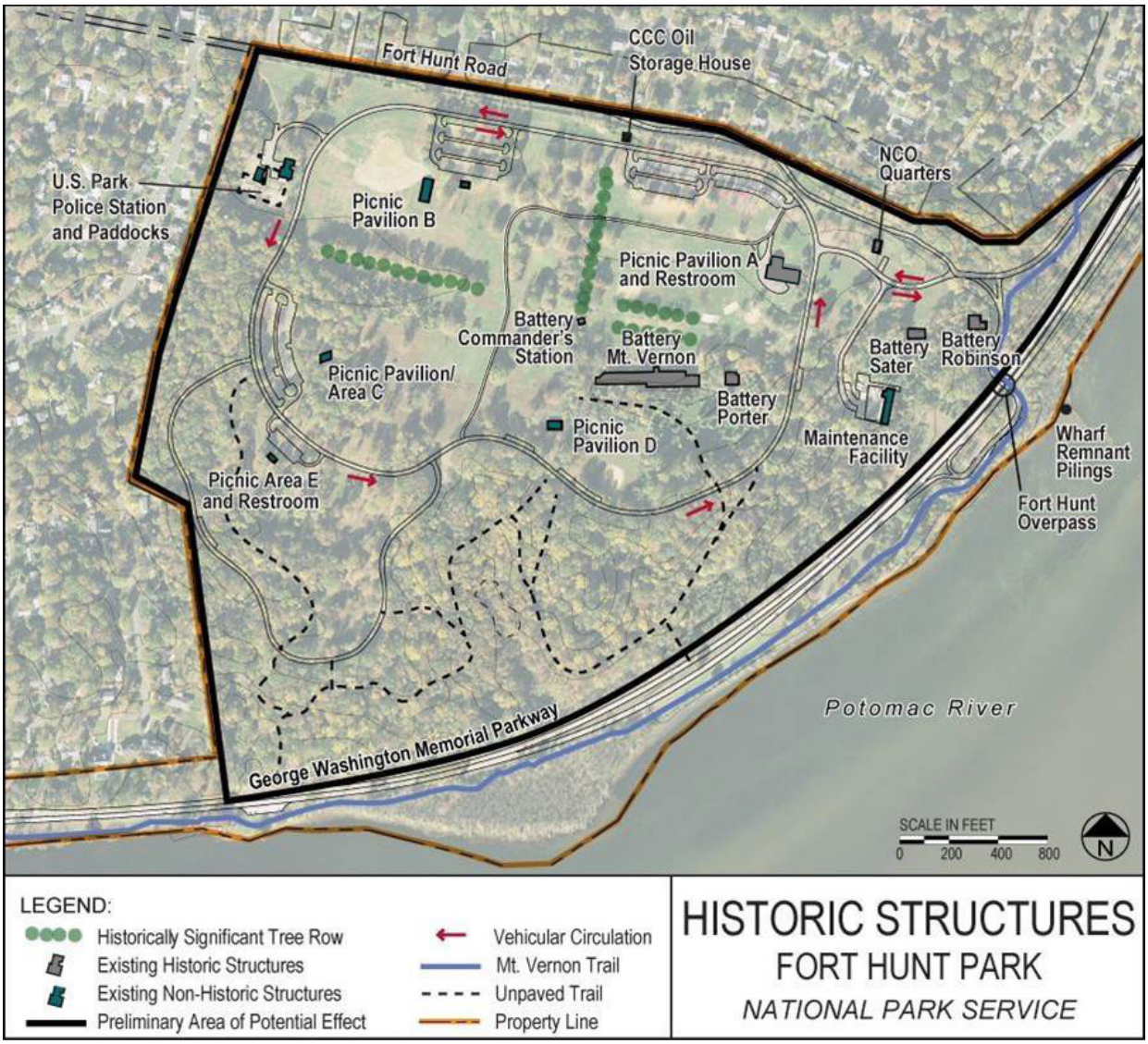

Figure 9. Historic Structures within the APE

Officially named Fort Hunt on April 13, 1899, the post never witnessed any hostile military action, and was obsolete and abandoned by 1923. The following year, the War Department declared Fort Hunt surplus property. Over the subsequent decade, Fort Hunt was little used. In 1928, the fort was re-garrisoned by the 16th Infantry Brigade, and in 1931, the War Department authorized an African American Reserve Officers' Training Corps (ROTC) unit to drill periodically at the site. That same year, the War Department determined it was no longer financially feasible to operate Fort Hunt and sought to dispose of the property.

By this time a new parkway, known as the Mount Vernon Memorial Highway, under construction since 1929, bisected Fort Hunt's eastern property. Fort Hunt was officially incorporated into the roadway and purchased by the Director of Public Buildings and Public Parks of the National Capital from the Secretary of War after the passing of the Capper-Cramton Act in 1930.

Since becoming an NPS property, Fort Hunt has served various functions. During three "Bonus Marches" in 1932, 1933, and 1934, WWI veterans agitating for early payment of federal bonuses used Fort Hunt as a temporary tent city. While the veterans were not successful in securing the federal funds, they were influential in President Roosevelt's creation of the Civilian Conservation Corps (CCC), which employed men to perform conservation work in national parks and other federal lands. From October 1933 until March 1942, Fort Hunt functioned as a CCC camp. Work at the camp was primarily focused on creating a recreational site with park amenities. The CCC crew cleared vegetation, created trails and bridle paths, constructed rustic "parkitecture" for the picnic areas, and erected numerous buildings, most of which were temporary. Historic photos document the excavation of a small lake (referred to as the CCC pond throughout this document) in a swampy ravine at the south end of the site around 1935.

In May of 1942, the Secretary of the Interior approved a special use permit for the Department of the Army to occupy Fort Hunt for the duration of the war, plus one additional year. Under the operation of the Department of the Army, Fort Hunt became a top-secret military intelligence center known as P.O. Box 1142. Several programs operated out of 87 buildings on site – many newly erected for temporary use. Programs included MIS-Y (Military Intelligence Service-Y), which was a joint interrogation center for German prisoners of war (POWs), and MIS-X (Military Intelligence Service-X), which was responsible for aiding American POWs to escape German camps by sending "care packages" that contained concealed escape tools. A third program, MIRS (Military Intelligence Research Section), supported interrogation efforts and tactical decisions. During P.O. Box 1142's operation from July 1942 through November 1946, 3,451 POWs were held and nearly 5,000 interrogations were conducted (NPS 2001, revised 2004). By the fall of 1946, with the war over and the operations at P.O. Box 1142 terminated, Fort Hunt was declared surplus by the War Department and the buildings were dismantled; in January 1948, the site was transferred back to the NPS. Because the veterans of P.O. Box 1142 signed a secrecy agreement and their work was classified, the site's WWII history was little known by NPS officials during the decades that followed.

The NPS regarded Fort Hunt as an "essential part of the federal parks serving the Washington Metropolitan area," and in the 1960s, officials focused on developing the park for recreational and public use purposes with funds from the Mission 66 program (Laird 2000). Cornelius W. Heine, Chief of the Division of Public Use and Interpretation of National Capital Parks, recommended installing picnic tables, fireplaces, drinking fountains, and nature trails. From 1963-64, an 8,000-square-foot picnic pavilion was erected on the site along with two comfort stations, interpretive waysides, three softball diamonds, and the western portion of the loop road. Fort Hunt Park, encompassing over 150 acres and boasting new public amenities, opened to the public in 1964.

Documents from P.O. Box 1142 began to be declassified in waves starting in 1977, and in 1990 Lloyd Shoemaker – a former employee at the complex – published his firsthand account of the clandestine programs in his book *The Escape Factory*. Since the publication of this document, GWMP officials have worked with veterans to capture and document Fort Hunt's story and have conducted more than 72 interviews of veterans and others associated with the site, including two German POWs and three German scientists.

In October 2008, GWMP officials organized a reunion at Fort Hunt Park for veterans of P.O. Box 1142. At precisely 11:42 a.m., a new flag pole – reestablished in its war-time location – was dedicated to honor those

soldiers who were heretofore unrecognized (Vincent Santucci, Chief Ranger, GWMP, in a presentation at Fort Hunt Park, October 27, 2010).

Following are the contributing resources of the historic district:

- Battery Mount Vernon: Constructed 1896-1898, the largest and westernmost battery at Fort Hunt Park
- Battery Porter: Constructed 1898-1901, intended to draw enemy ships into range of Battery Mount Vernon's guns
- Battery Robinson: Constructed 1898-1901, intended to draw enemy ships into range of Battery Mount Vernon's guns
- Battery Sater: Constructed 1900-1903, intended to increase the naval mine or torpedo field between Fort Hunt and Fort Washington against torpedo boats and other small craft
- Battery Commander's Station: Constructed 1899-1901, used for observation and direction of the fire from guns. The tower was to communicate with Fort Washington by cable lines under the river and with the batteries by buried phone lines
- NCO Quarters: Constructed 1905, easternmost and only extant house of a row of three houses
- Fort Hunt Overpass: Constructed 1929, designed by landscape architect Gilmore Clarke to carry the parkway over the Fort Hunt underpass
- The Brick Storage Building (also known as the CCC Oil Storage House): Constructed circa 1935, potentially built by the CCC. Although not listed on the NHRP nomination, the Cultural Landscape Inventory determined the building to be a contributing resource
- Wharf pilings: remnants of two historic wharves used to transfer supplies and construction materials to Fort Hunt. Although not listed on the NRHP nomination, the Cultural Landscape Inventory determined the structure to be a contributing resource

Although not yet formally evaluated, several buildings and structures at Fort Hunt Park have potential National Register significance for their association with the NPS park design and construction program known as Mission 66. These include the Area A picnic pavilion and Area B and E comfort stations. These buildings are mentioned in the National Register Multiple Property Documentation Form for Mission 66-era visitor centers, administration buildings, and public use areas in the National Capitol Region, completed in 2012 (Robinson and Associates 2012).

The undertaking has the potential to affect a second historic district listed in the NRHP: the George Washington Memorial Parkway (GWMP). It was listed as an historic district on April 19, 1995, under Criterion B for its commemoration of George Washington and Clara Barton, as well as Criterion C for its landscape architecture.

GWMP, which occupies 7,749.64 acres of land in Virginia, Maryland, and the District of Columbia, is traversed by a planned and landscaped roadway system that extends approximately 25 miles along the Potomac River in Virginia. Initially conceived as a memorial to George Washington, the parkway was authorized by Congress in 1928. Construction of the road, known as the Mount Vernon Memorial Highway (MVMH), commenced in 1929. With the passage of the Capper-Cramton Act the following year, Congress authorized a "George Washington Memorial Parkway, " which incorporated the MVMH and was conceived to flank both sides of the Potomac River to Great Falls. Construction on the MVMH portion of the new roadway was completed in three years, opening in 1932 for the bicentennial of Washington's birth. The northern sections of the George Washington Memorial Parkway, authorized in 1930, were constructed from 1935 to 1962. The final section in Maryland, now known as the Clara Barton Parkway, was completed in 1970.

Approximately nine million visitors use the parks at GWMP annually, including the national and international monuments and memorials, natural and recreational areas, trails, a living history farm, historic homes, and an arts and crafts park. These sites, while each possessing a distinct history and individual merits, are united by the parkway and together represent broad themes in the nation's history.

An important recreational feature of GWMP is the 18-mile, multi-use Mount Vernon Trail (MVT) that parallels the parkway. Construction began on the trail in 1972, with the first section laid out between 14th Street Bridge and Alexandria. The NPS improved and extended the trail over the subsequent decades, including a northern extension of the MVT from Memorial Bridge to Theodore Roosevelt Island completed in the 1980s. The MVT is not a contributing resource to the GWMP.

Since its inception, the parkway has served as a grand entryway to the nation's capital and as a steward to the Potomac River and its watersheds. The following park sites are under the jurisdiction of GWMP: Arlington House: The Robert E. Lee Memorial; Arlington Memorial Bridge & Memorial Avenue; Belle Haven Marina; Belle Haven Park; Clara Barton National Historic Site; Collingwood Park; Columbia Island Marina; Claude Moore Colonial Farm; Daingerfield Island; Dyke Marsh Wildlife Preserve; Fort Hunt Park; Fort Marcy; Glen Echo Park; Gravelly Point; Great Falls Park; Jones Point Park; Lady Bird Johnson Park; Lyndon Baines Johnson Memorial Grove-on-the-Potomac; Mount Vernon Trail, Netherlands Carillon; Riverside Park; Roaches Run Waterfowl Sanctuary; Theodore Roosevelt Island; Turkey Run Park; U.S. Marine Corps War Memorial; Washington Sailing Marina; and the Women in Military Service For America Memorial.

While some of these sites were included in the original parkway authorization, others were separately legislated and incorporated under the Administration of GWMP, including Arlington House: The Robert E. Lee Memorial; Clara Barton National Historic Site; Lady Bird Johnson Park; and Theodore Roosevelt Island.

CULTURAL LANDSCAPES

Cultural landscapes, as defined in the NPS's Preservation Brief 36: Protecting Cultural Landscapes: Planning, Treatment, and Management of Historic Landscapes (NPS 1994), consist of —a geographic area (including both cultural and natural resources and the wildlife or domestic animals therein) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. The proposed alternatives have the potential to affect, directly or indirectly, one individually significant cultural landscape: Fort Hunt Park. There are no identified formal component landscapes within Fort Hunt Park.

A Cultural Landscape Inventory (CLI) was completed by the NPS for Fort Hunt Park in 2001.The CLI specified the features of Fort Hunt Park that contribute to the landscape's significance. These include structures, circulation features, land use activities, small-scale features, vegetation, and views and vistas (Figure 10).

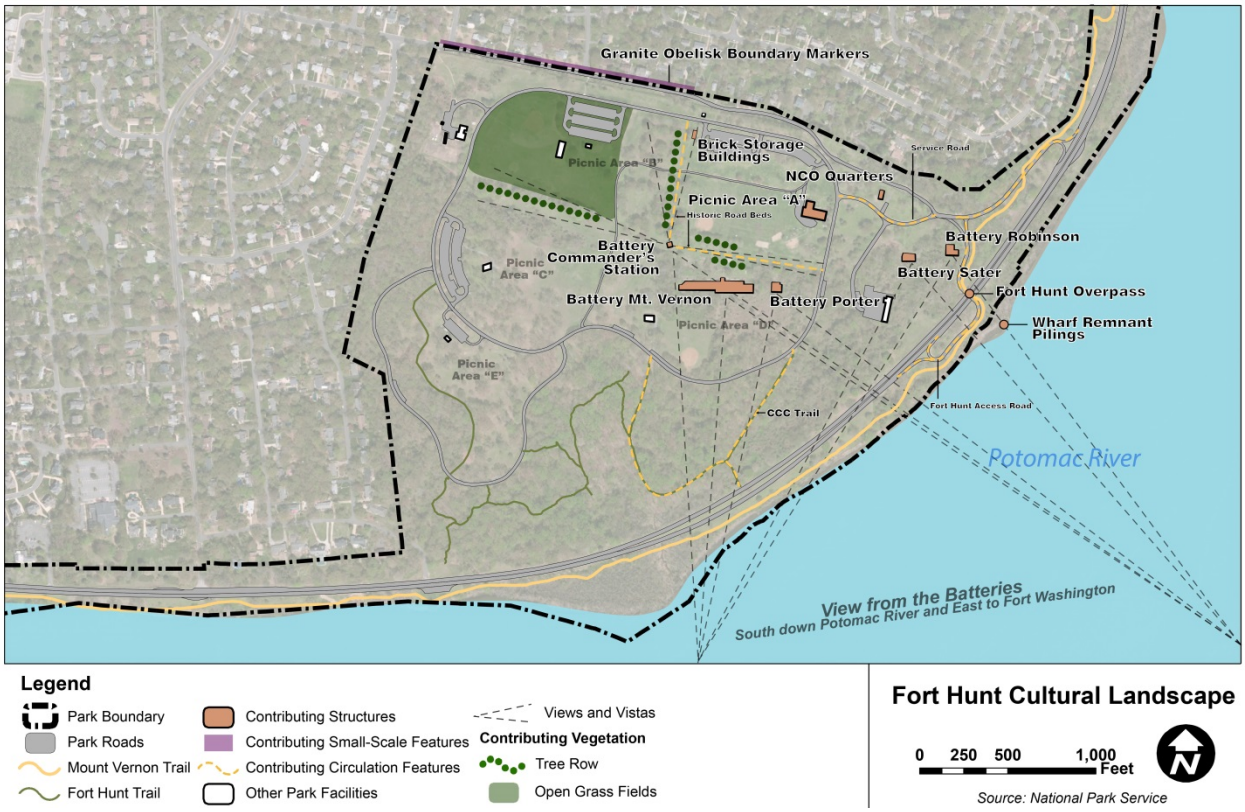

Figure 10. Cultural Landscape Features within the APE

Contributing structures to the CLI include Battery Mount Vernon, Battery Porter, Battery Robinson, Battery Sater, the Battery Commander's Station, the NCO Quarters, the Fort Hunt Overpass, the brick storage buildings and the wharf pilings.

Contributing circulation features include both road and trail elements. The CLI identified the Fort Hunt access road to the northbound George Washington Memorial Parkway, which travels under the Fort Hunt Overpass as a contributing element. Several routes of historic roads extant in Area A are also contributing elements; these include a service road that extends west from the picnic pavilion through picnic Area A, historic road beds lined with allées of trees, and historic road beds identified by raised grass lanes. A remnant loop road north of the CCC pond, which once led to an entrance to the parkway, is a contributing circulation feature. Finally, CCC trails in Area E and the wooded area at the south of the park were identified as contributing elements. The CLI determined that land-use activities, including picnicking and other types of family recreation contribute to the significance of Fort Hunt Park. Identified contributing small-scale features include an obelisk-shaped granite boundary marker on the NPS boundary at Fort Hunt Road and a wood marker located nearby. The CLI determined five stone fireplaces in the wooded area at the south of the park, examples of CCC- parkitecture, are also contributing.

Contributing vegetation includes allées and other older trees within Area A; open, grassed fields; a pair of Canadian oaks planted in 1939 in Area B to commemorate the visit of the King and Queen of England (these trees have more recently been identified as pin oaks; only one pin oak remains); dense, irregular grouping of native trees along the historic pasture line traversing the center of the site and separating areas A and D from B and C; a treeline of red maples growing along an old streambed separating Area C1 and Area B; a treeline defining an old roadbed between Areas C1 and C2; the woodland border around the entire perimeter; and the woodland to the south in Areas E and F.

The cultural landscape at Fort Hunt Park also includes views and vistas. Although many of these views are now obstructed by vegetation, some of the most important include historic views south down the Potomac River and east to Fort Washington from the four batteries and the Battery Commander's Station. Contributing internal views include views across fields in the central area; views down allées of trees lining historic road alignments; views of the surrounding woods from the central area; and vistas to the four batteries and to the Battery Commander's Station.

Although not yet formally evaluated, and not identified as contributing landscape features in the 2004 CLI, the cultural landscape of Fort Hunt Park appears to contain resources that are potentially significant for their association with Mission 66. The 2012 National Register Multiple Property Documentation Form for Mission 66-era resources in the National Capitol Region identifies Fort Hunt Park as having Mission 66 design significance. The form states, "NPS regarded Fort Hunt as an 'essential part of the federal parks serving the Washington Metropolitan area,' and in the 1960s, officials focused on developing the park for recreational and public use purposes with funds from the Mission 66 program" (Robinson and Associates 2012). According to the form, the Fort Hunt Park picnic pavilion is notably representative of Mission 66-era recreational facility design in the region's national parks. Also noted as part of the public use area design under Mission 66 are two comfort stations (at Areas C and E), three softball diamonds, and much of the current circulation system (loop roads, parking areas, service roads). Interpretive waysides were also installed under Mission 66 but have been replaced, possibly more than once, in the intervening years.

ARCHEOLOGICAL RESOURCES

This section addresses archeological resources present or potentially present within the APE defined by the NPS for this undertaking. The APE for Historic Resources includes the entire Fort Hunt Park National Historic District. However, at this point, ground-disturbing activities that could impact archeological resources include two alternative locations for a Visitor Services Zone, alteration of parking areas and picnic facilities, and associated infrastructure utilities, such as water and sewer, among others.

Few archeological investigations have been conducted within Fort Hunt Park. In 1985, NPS archeologists tested selected locations along a southern half of the Mount Vernon Memorial Highway at which archeological resources were found at several locations along the Parkway adjacent to Fort Hunt (Inashima 1985). In 1986, Inashima tested the alignment of a proposed parking lot between the main entrance road, maintenance facility, and park loop road in Fort Hunt Park, during which survey one archeological sites (44FX1064) was recorded (Inashima 1986). Virta (1991) reports on investigations conducted in advance of a sewer line connection, and Shellenhamer (2009) describes the results of a ground penetrating radar survey in the park conducted to locate WWII-era archeological resources. A memo has also been prepared that documents small scale investigations at picnic shelter locations (Bies 2005).

One archeological site has been registered with the Virginia Department of Historic Resources (VDHR) within the APE for the Fort Hunt Park SDP as of March 2015. In addition, six additional archeological sites have been located within one mile of Fort Hunt on the floodplain between the George Washington Memorial Parkway and the Potomac River. These seven sites document a continuous occupation of areas adjacent to Fort Hunt Park from the PaleoIndian period, almost 14,000 years ago, to the present. VDHR assigns what is known as a trinomial site number to each archeological site reported in the Commonwealth.

The one archeological resource within the APE, site 44FX1064, was reported during the course of one of the few professional archeological surveys that have been conducted at Fort Hunt (Inashima 1986). The site contained both prehistoric and historic-era artifacts, but the prehistoric artifacts cannot be ascribed to a specific time period in the prehistoric past. For the six archeological sites located within one-mile of Fort Hunt, PaleoIndian and Archaic period (7500- 1000 BC) occupations have been identified at site 44FX0211, while Middle Woodland (300 BC-AD1000) camps and villages have been identified at sites 44FX0618, 44FX2323, and 44FX2551. A Late Woodland (AD1000-contact) component is present at site 44FX2323 and unidentified Woodland occupations are present at 44FX0211 and 44FX0713. Historic period sites include a possible Civil War winter encampment at 44FX2745 and a late eighteenth to early nineteenth century domestic occupation at 44FX0713. The term “occupation” signifies the presence of some type of human settlement. Occupations can include camps, villages, farmsteads, forts, or towns, among others. While all of the sites near Fort Hunt are located on floodplain formations, and much of the park is situated on a high terrace plateau overlooking the Potomac River, the density of pre-contact Native American sites in the vicinity suggests that Fort Hunt Park has a high potential for the presence of unidentified pre-contact Native American sites. There is also a significant likelihood, based on the known archeological record in the region and the history of the site, for post-contact Native American sites.

Fort Hunt Park, once part of George Washington’s River Farm, may also contain archeological vestiges of its use as a farm in the eighteenth century. The earliest historic archeological remains that may be within the APE would be associated with the tenant farm depicted on Washington's 1766 map of the Clifton's Neck tract.

Fort Hunt is also associated with a rich military history that began in the last quarter of the nineteenth century. The Historic Structures and Districts section of Chapter 3 provides a more complete discussion of this history, which has been recognized by the listing of the Fort Hunt Historic District NRHP district. Many of the WWII facilities are represented within Fort Hunt Park as foundations. Much of the Park should be considered sensitive to undocumented, historic archeological remains.

VISITOR USE AND EXPERIENCE

Fort Hunt Park supports a number of recreational activities, including permitted picnics at four picnic areas, ballfields, volleyball courts, a playground, and trails. Park visitors come to the site to participate in recreation or to experience the cultural and natural resources. Fort Hunt Park saw a total of 324,223 visitors in 2014, the majority of which utilized the picnic pavilions and areas in the spring and summer months (Table 4) (NPS 2015b). Providing this recreational access to the community is important to maintaining an enjoyable visitor experience. According to NPS Management Policies (2006), the NPS is committed to providing appropriate,

high quality opportunities for visitors to enjoy parks, and maintain an open, inviting, and accessible atmosphere within parks for every segment of society.

Fort Hunt Park has experienced a decrease in visitation in the last five years. The park saw a total of 412,033 visitors in 2010 and a total of 324,243 visitors in 2014. The majority of visitors utilize the park's picnic facilities. The park has five designated picnic pavilions and areas. Picnic Area E is available on a first-come, first-served basis and contains no covered pavilion. Picnic Pavilions A, B, and D and Picnic Pavilion/Area C are available by online reservation from April through October; no waitlists are available. Instead, if a reservation is cancelled via the online reservation system, the next person searching for a reservation receives it. Picnic Pavilion A is the largest in the park and allows up to 600 users at a time, although groups often exceed the permitted number of users.

Table 5 displays the maximum capacity for each picnic pavilion and area and the number of parking spaces provided at each area. The total permitted number of users when all reservation-only picnic pavilions and areas are booked to capacity is 1,390 people (Recreation.gov n.d.). ADA-compliant picnic tables are provided at Picnic Pavilions A, B, and D and Picnic Area C-2. Visitors in 2014 totaled 324,243. The park sees the majority of visitors in the spring and summer months, when the picnic pavilions and areas throughout the park are available for reservation.

Table 4. Fort Hunt Visitor Use by Month

	2014	2013	2012	2011	2010
January	15,847	13,151	10,913	19,128	9,411
February	10,120	8,882	14,224	30,250	7,255
March	49,889	60,844	49,140	39,686	104,334
April	60,967	45,953	108,571	54,961	81,985
May	21,992	22,851	23,743	24,670	21,425
June	42,863	40,217	37,734	35,406	48,975
July	36,876	44,514	36,380	29,732	50,400
August	22,056	22,050	22,026	22,001	16,314
September	33,290	38,344	33,047	28,481	24,546
October	2,058	11,215	22,590	22,590	23,111
November	18,451	14,419	14,742	26,192	13,727
December	9,834	10,338	9,826	9,339	10,550
Total	**324,243**	**332,778**	**382,936**	**342,436**	**412,033**

Fort Hunt Park's picnic facilities are popular with users in the Washington metropolitan area because the cost of rental is low compared with other local parks and the park has a large green space associated with the pavilions. Additionally, Fort Hunt Park is one of few parks in the region which allows for the consumption of

alcohol on site. The park's reservation system prohibits the reservation of multiple pavilions by the same group, as this limits public use, creates traffic congestion, and stresses park infrastructure. Parking is provided at multiple lots in proximity to the picnic pavilions and areas. Neighbors experience overflow parking on local streets and disruptive noise levels during times of peak use.

Table 5. Picnic Facilities Summary

Picnic Pavilion/Area	Maximum Capacity	Parking Spaces
A	600	150
B	350	140
C-1	100	40
C-2	120	40
C-3	100	40
D	120	30

Restrooms, also referred to as comfort stations, are provided near the picnic pavilions. Picnic Area A has an indoor ADA-accessible restroom with electricity and flush toilets. Picnic Areas B, C, and E have indoor restrooms with flush toilets that are closed during the winter months. The restrooms at Picnic Areas B, C, and E do not meet current ADA accessibility standards. Picnic Area D has portable toilets during the summer months. Restroom facilities are not currently adequate to support times of peak visitor use; there are not enough facilities to support visitor numbers.

Currently, visitors to the park can explore the exteriors of former gun batteries and the Battery Commander's Station. A series of eight wayside exhibits interpret various aspects of the site's history. A WWII memorial consisting of a flagpole and memorial marker is on site. These resources, while providing some opportunities to interpret history, are limited in communicating the depth and diversity of history at Fort Hunt.

In addition to the picnic facilities, there are three ballfields, a playground, and two volleyball courts available for recreational use in Fort Hunt Park (see Figure 11). The ballfields are used for pick-up games by picnickers and casual visitors. No sport leagues utilize the park. Hiking and biking pathways are available to visitors along park roads and unpaved trails. Visitors expressed concern during the initial project scoping in 2011, with pedestrian and vehicular conflicts along the park loop road. These concerns were attributed to high vehicle speeds within the park. Fort Hunt Park is connected to the Mount Vernon Trail, an 18-mile trail along the Potomac leading to Theodore Roosevelt Island. Many visitors enjoy visiting the horses at the U.S. Park Police paddocks. The NPS offers Special Use Permits for activities such as high school races. On Sunday evenings throughout the summer, the park hosts the Fort Hunt Concert Series. The concerts are free, open to the public, and include a variety of jazz, folk, rock, and other musical styles.

Figure 11. Clockwise from Upper Left- tree allee; joggers on loop road; playground; trail; summer concert; and cyclist on loop road

CHAPTER 4 : ENVIRONMENTAL CONSEQUENCES

This Environmental Consequences chapter analyzes both beneficial and adverse impacts that would result from implementing any of the alternatives considered in this EA. This chapter also includes definitions of impact thresholds (e.g., negligible, minor, moderate, and major), methods used to analyze impacts, and the methods used for determining cumulative impacts. As required by CEQ regulations implementing NEPA, a summary of the environmental consequences for each alternative is provided in Table 3, which can be found in Chapter 2: Alternatives. The resource topics presented in this chapter, and the organization of the topics, correspond to the resource discussions contained in Chapter 3: Affected Environment.

GENERAL METHODOLOGY FOR ESTABLISHING IMPACT THRESHOLDS AND MEASURING EFFECTS BY RESOURCE

The following elements were used in the general approach for establishing impact thresholds and measuring the effects of the alternatives on each resource category:

- General analysis methods as described in guiding regulations, including the context and duration of environmental effects;
- Basic assumptions used to formulate the specific methods used in this analysis; thresholds used to define the level of impact resulting from each alternative;
- Methods used to evaluate the cumulative impacts of each alternative in combination with unrelated factors or actions affecting park resources; and
- Methods and thresholds used to determine if impairment of specific resources would occur under any alternative.

These elements are described in the following sections.

General Analysis Methods

The analysis of impacts follows CEQ guidelines and DO-12 procedures (NPS 2001) and is based on the underlying goal of supporting enhanced visitor experience and providing for long-term protection, conservation, and restoration of park resources. This analysis incorporates the best available scientific literature applicable to the region and setting, the species being evaluated, and the actions being considered in the alternatives.

As described in chapter 1, the NPS created an interdisciplinary science team to provide important input to the impact analysis. For each resource topic addressed in this chapter, the applicable analysis methods are discussed, including assumptions and impact intensity thresholds.

Impact Thresholds

Determining impact thresholds is a key component in applying NPS Management Policies (2006) and DO-12. These thresholds provide the reader with an idea of the intensity of a given impact on a specific topic. The impact threshold is determined primarily by comparing the effect to a relevant standard based on applicable or relevant/appropriate regulations or guidance, scientific literature and research, or best professional judgment.

Because definitions of intensity vary by impact topic, intensity definitions are provided separately for each impact topic analyzed in this document. Intensity definitions are provided throughout the analysis for negligible, minor, moderate, and major impacts. In all cases, the impact thresholds are defined for adverse impacts. Beneficial impacts are addressed qualitatively.

Potential impacts of all alternatives are described in terms of type (beneficial or adverse); context; duration (short- or long-term); and intensity (negligible, minor, moderate, or major). Definitions of these descriptors include:

Beneficial: A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.

Adverse: A change that declines, degrades, and/or moves the resource away from a desired condition or detracts from its appearance or condition.

Context: Context is the affected environment within which an impact would occur, such as local, park-wide, regional, global, affected interests, society as whole, or any combination of these. Context is variable and depends on the circumstances involved with each impact topic. As such, the impact analysis determines the context, not vice versa. Site-specific impacts would occur at the location of the action, local impacts would occur within the general vicinity of the project area, park-wide impacts would affect a greater portion outside the project area yet within the park, and region-wide impacts would extend beyond park boundaries.

Duration: Impacts can be either short-term or long-term. A short-term impact would be temporary in duration and would be associated with the construction process. Depending on the resource, impacts would last as long as construction was taking place, or up to one year after construction is completed. Long-term impacts last beyond the construction period, and the resources may need more than one year post-construction to resume their preconstruction condition. Impact duration for each resource may differ and is presented for each resource topic, where applicable.

Intensity: Because definitions of impact intensity (negligible, minor, moderate, and major) vary by impact topic, intensity definitions are provided separately for each impact topic analyzed.

Study Area

The project study area is generally the Fort Hunt Park, which is the 157.4-acre park under the jurisdiction of the NPS, part of GWMP, and adjacent to the Potomac River to the south and east and residential areas of Mount Vernon to the north and west (refer to Figure 1). In some cases, the study area for individual resource topics vary and are defined separately for each impact topic if it is different than the general study area.

CUMULATIVE IMPACTS ANALYSIS METHOD

The CEQ regulations to implement NEPA require the assessment of cumulative impacts in the decision making process for federal projects. Cumulative impacts are defined as the impact on the environment, which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions (40 CFR 1508.7). As stated in the CEQ handbook, Considering Cumulative Effects (CEQ 1997), cumulative impacts need to be analyzed in terms of the specific resource, ecosystem, and human community being affected and should focus on effects that are truly meaningful. Cumulative impacts are considered for all alternatives, including the No Action Alternative. To determine the potential cumulative impacts, existing and anticipated future projects within the study area and in the surrounding area were identified. The projects identified as cumulative actions are provided in Table 6.

The analysis of cumulative impacts was accomplished using four steps:

Step 1 — Identify Resources Affected - Fully identify resources affected by any of the alternatives. These include the resources addressed as impact topics in chapters 3 and 4 of the document.

Step 2 — Set Boundaries - Identify an appropriate geographic boundary for each resource. The geographic boundary for each resource topic is listed under each topic.

Step 3 — Identify Cumulative Action Scenario - Determine which past, present, and reasonably foreseeable future actions to include with each resource. Reasonably foreseeable projects are generally those anticipated to be implemented in a three to five years period. These are listed in Table 6 and described below.

Step 4 — Cumulative Impact Analysis - Summarize impacts of these other actions (x) plus impacts of the proposed action (y), to arrive at the total cumulative impact (z). This analysis is included for each resource in Chapter 4.

The locations of the cumulative impact projects identified for this EA are presented in Figure 12. Descriptions are presented in Table 6.

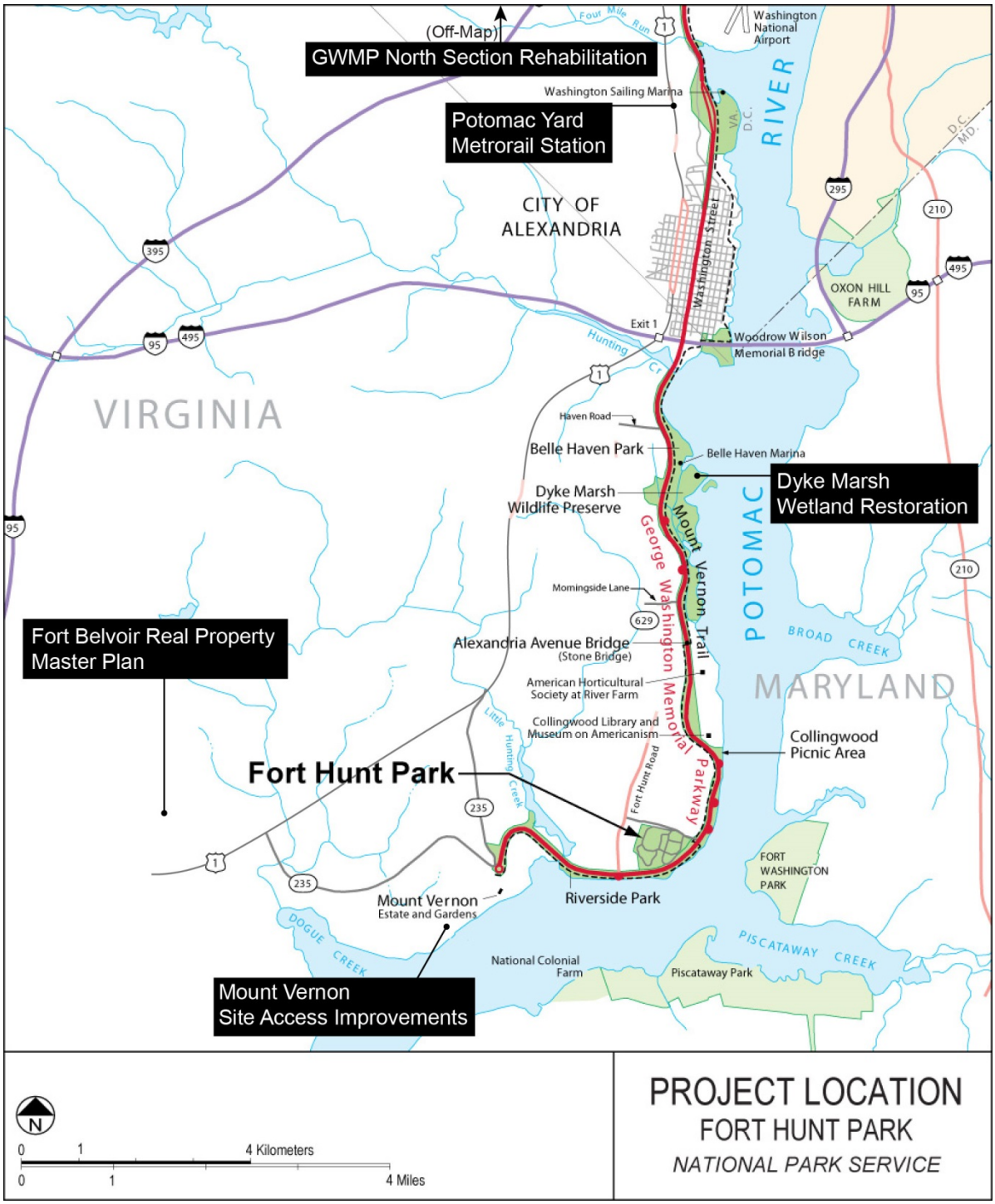

Figure 12: Location of Cumulative Projects

Table 6. Cumulative Impact Projects

Type of Action	Cumulative Impact Project	Description	Status
GWMP Projects	Dyke Marsh Wetland Restoration and Long Term Management Plan/ Final EIS (NPS 2014a)	The EIS evaluated alternatives to protect existing wetlands from erosion, exotic plant species, loss of habitat, and altered hydrologic regimes. **Affected Resource Areas:** The wetland restoration and management plan would potentially have impacts on soils, vegetation, wildlife, historic districts and structures, cultural landscapes, and visitor use and experience.	Ongoing
	GWMP North Section Rehabilitation	Improvements to the northern portion of GWMP would upgrade the roadway conditions on the northbound and southbound lanes and improve drainage and safety between Spout Run and the Capital Beltway (Interstate 495). **Affected Resource Areas:** The GWMP North Section Rehabilitation would potentially have impacts on soils, vegetation, wildlife, cultural resources, and visitor use and experience.	Past/Ongoing
Regional Projects in Vicinity of Fort Hunt Park	Fort Belvoir Real Property Master Plan/EIS (AECOM 2014)	Fort Belvoir would construct nearly 3.5 million square feet of new or expanded facilities and increase the number of personnel from the current working population of 39,000 to approximately 56,000 by 2030. Affected Resource Areas: The Draft EIS for the Fort Belvoir Real Property Master Plan identified impacts on the following resource areas: soils, vegetation, wildlife, and cultural resources.	Ongoing/Future
	George Washington's Mount Vernon Site Access Improvements	George Washington's Mount Vernon has recently undertaken improvements at the facility, such as expansion of parking. Other changes to the site may take place as part of ongoing facilities maintenance and improvements. Affected Resource Areas: George Washington's Mount Vernon improvements could have potential impacts on the following resource areas: soils, vegetation, wildlife, and cultural resources.	Past/Ongoing

Type of Action	Cumulative Impact Project	Description	Status
Regional Projects in Vicinity of Fort Hunt Park	Potomac Yard Metrorail Station	The Washington Metropolitan Area Transit Authority (WMATA) proposes to construct a new Metrorail station, associated track improvements, and pedestrian bridges at Potomac Yard within the City of Alexandria. The station would be located along the existing Metrorail Blue and Yellow Lines between the Ronald Reagan Washington National Airport Metrorail Station and the Braddock Road Metrorail Station. **Affected Resource Areas:** The Potomac Yard Metrorail Station would potentially have impacts on soils, vegetation, wildlife, cultural resources, and visitor use and experience.	Future
Local and Regional Plans	Chesapeake Bay Bald Eagle Recovery Plan (USFWS 1990)	An action plan dedicated to achieving recovery of the bald eagle population in the Chesapeake Bay region. Strategies for recovery include long-term maintenance of shoreline habitat and food resources and public awareness. 1990 revisions of the plan recognized the improving status of the bald eagle population in the region. **Affected Resource Areas:** The protection of bald eagles and their habitat has resulted in impacts on vegetation and wildlife.	Ongoing
Local and Regional Plans	Fairfax County Comprehensive Plan/Area Plan (Fairfax County 2011a)	A document used by County government and the public in order to guide decisions regarding the built and natural environment. The plan is reviewed every four years to ensure maximum citizen participation. **Affected Resource Areas:** All resource areas analyzed in this EA are addressed by the goals of the Comprehensive Plan.	Ongoing
Local and Regional Plans	Virginia Coastal Zone Management Program (VDEQ 2010c)	Program initiated by federal law in order to manage coastal zone resources. Enforceable laws are organized under Coastal Zone Management including wetlands, fisheries, dunes, and other environmental shoreline features. **Affected Resource Areas**: Coastal Zone Management has resulted in impacts on vegetation and wildlife.	Ongoing

SOILS

Methodology and Assumptions

For soil resources, potential impacts were assessed based on limitations associated with the soils and the extent of possible disturbance. The impact analysis and the conclusions for possible impacts on the resources were based on review of existing literature, soil and topography maps, and information provided by the NPS and other agencies.

Study Area

The soils study area consists of the entirety of Fort Hunt Park.

Impact Thresholds

Negligible: The effects on soils would be at or below the lower levels of detection. Any effects on soils would be slight.

Minor: The effects on soils would be detectable. Areas of soils affected would be relatively small. Mitigation may be needed to offset adverse effects and would be relatively simple to implement and likely be successful.

Moderate: The effect on soil would be readily apparent and result in a change to the soil character over a relatively wide area. Mitigation measures would be necessary to offset adverse effects and likely be successful.

Major: The effect on soil would be readily apparent and substantially change the character of the soils over a large area in and out of the park. Mitigation measures to offset adverse effects would be needed, would be extensive, and their success could not be guaranteed.

Duration: Short-term impacts would result in recovery in less than three years; Long-term impacts would take more than three years to recover.

IMPACTS OF ALTERNATIVE 1: NO ACTION

Under Alternative 1: No Action, existing conditions at Fort Hunt Park would continue. No facilities would be constructed or demolished, no vegetation would be planted or cleared, and the internal park roads and parking areas would remain in their current configurations. In addition, existing maintenance and operational procedures would continue unchanged. Existing areas of compacted soils would remain, and high use areas and slopes within the park would continue to experience limited erosion. While areas of compacted soils would limit the percolation of stormwater into underlying soils, such areas of the park are of minimal size in both the context of the park and the surrounding region. Areas of the park experiencing erosion are similarly small in the context of the park and the surrounding region, and contribute negligibly to the sedimentation of downstream watercourses. Therefore, continuing compaction and erosion would result in long-term minor adverse impacts on soils.

Cumulative Impacts

Other past, present and reasonably foreseeable future actions occurring within the vicinity of Fort Hunt Park could result in adverse impacts on soils within the geographic boundary for cumulative projects. The Dyke Marsh Wetland Restoration would alter and disturb soils on the Potomac River river bottom, resulting in both beneficial and adverse impacts. The GWMP North Section Rehabilitation, the proposed Potomac Yards Metrorail Station in the City of Alexandria, projects included in the Fort Belvoir Real Property Master Plan, site access improvements at George Washington's Mount Vernon, and projects implemented in fulfillment of the Fairfax County Comprehensive Plan/Area Plan could result in soil disturbance, the alteration of soil layer structure, soil compaction, short-term erosion during construction activities, and the creation of new impervious areas that would prevent the percolation of stormwater into underlying soils and increase the volume of stormwater runoff.. As described above, the No Action Alternative would result in long-term minor adverse impacts. When combined with the cumulative projects, the No Action Alternative would have long-term minor adverse cumulative impacts on soils.

Conclusion

Implementation of the No Action Alternative would have long-term minor adverse impacts on soils in Fort Hunt Park due to existing areas of soil compaction and erosion that would remain. Therefore, the No Action Alternative would have long-term minor adverse cumulative impacts on soils.

IMPACTS OF ALTERNATIVE 4: INTERIOR VISITOR SERVICES

Alternative 4: Interior Visitor Services includes elements that would result in soil disturbance. A new visitor services zone with a kiosk, wayside, and/or visitor services facility, along with restrooms, would be installed and parking and picnic areas in Area C would be removed. As part of the Roadway Realignment Option, two portions of the loop roadway would be relocated, the Area E parking and restrooms would be removed, the Area D Ballfield would be re-vegetated, and a portion of the Area D parking would be removed. Designated trails in the wooded area of Fort Hunt Park would be rehabilitated to correct 60-90 feet of trail erosion and would close some social trails through reseeding, replanting, and general site rehabilitation. Soil impacts resulting from the construction of visitor interpretation facilities in Area C will be analyzed in future NEPA documentation prepared for that project and are not discussed in this EA.

In the short term, localized construction-related earth disturbance and vegetation removal associated with the projects included in Alternative 4 would, to varying degrees, result in the alteration of soil layer structure, soil compaction, increased erosion and sedimentation from wind and water, and generation of fugitive dust. As noted in Chapter 2, construction contractors would prepare an erosion and sediment control plan and implement and maintain erosion and sediment control measures for projects involving 2,500 square feet or more of soil disturbance in accordance with Fairfax County's erosion and sediment control regulations. Such measures would minimize the migration of sediments from the project site and could include silt fences, storm drain dams, sweeping or wetting soils inadvertently deposited on paved areas, and wetting or vegetating soils that would remain exposed for extended periods. Further, for projects involving one acre or more of earth disturbance, the contractor would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) and obtain coverage under Virginia's General Permit for the Discharge of Water from Construction Activities (Construction General Permit) in accordance with the requirements of the Virginia

Department of Environmental Quality's (VDEQ) Stormwater Management Program. The Construction General Permit and SWPPP would specify additional measures for minimizing pollutants and sediments carried by stormwater from the project site.

As noted in Chapter 2, staging for construction-related materials and equipment, and parking for construction workers' vehicles, would likely be provided at the existing Fort Hunt Park maintenance facility. If this is determined to be impractical, or if the space required exceeds what is available at the maintenance facility, staging and construction vehicle parking would be provided in proximity to the project sites in previously-disturbed areas of the park to avoid or minimize impacts on undisturbed soils, vegetation, and other sensitive park resources. Such areas could include portions of existing paved parking areas or within the limits of disturbance of an active project. Stabilized vehicle entrances to the project sites would be established to minimize impacts from erosion and sedimentation.

Overall, the implementation of Alternative 4 would disturb approximately six acres of soils in Fort Hunt Park, including approximately three acres of soils disturbed due to implementation of the Realignment Option. While adherence to the procedures described above and the requirements of erosion and sediment control plans, the SWPPP and the Construction General Permit would not completely eliminate the migration of airborne or waterborne sediments, they would substantially minimize them. The phased implementation of the projects over a period of several years would further minimize erosion and sedimentation impacts. Thus, short-term impacts on soils from construction-related erosion and sedimentation would be minor. As noted above, soil impacts related to the potential removal of Pavilion C and construction of a visitor services facility in Area C are not addressed in the SDP EA.

Following the completion of each project, disturbed areas not paved or otherwise developed would be vegetated, thereby minimizing soil erosion and maintaining soil permeability. Similarly, the re-vegetation of the ballfield in Area D under the Roadway Realignment Option would improve soil permeability in that area of the park by removing compacted soils underlying the ballfield and replacing them with vegetation. Under the Roadway Realignment Option, the sites of the Area E parking lot and restroom, as well as the segments of the relocated loop road that would be removed as part of the roadway realignment, would be returned to a permeable condition following the completion of those projects. Some areas within the Visitor Services Zone would be impervious, although such surfaces could be minimized through the use of permeable pavers. Similarly, a portion of the development would occur in already impervious areas. Though the restoration of the historic sightline to the Potomac River from Battery Robinson would involve soil disturbance of approximately 0.1 acre associated with the thinning or removal of trees and vegetation, no new impermeable surface would be created; rather, areas where existing vegetation would be removed would be replanted with native vegetation, thereby maintaining soil permeability. Additionally, the correction of trail erosion and the reseeding of some social trails would minimize erosion and sedimentation impacts. Overall, Alternative 4 would result in net gain of less than two acres of impervious surface within Fort Hunt Park. For these reasons, long-term adverse impacts on soils resulting from the implementation of Alternative 4 would be minor.

Cumulative Impacts

The cumulative projects for Alternative 4 would be the same as those described in the No Action Alternative. As described above, the implementation of Alternative 4 would have long-term minor adverse impacts on soils. Therefore, Alternative 4 would have the potential to contribute to cumulatively adverse impacts on

soils potentially resulting from other past, present, and reasonably foreseeable future projects in the vicinity of Fort Hunt Park.

Conclusion

Under Alternative 4, minor short-term construction-related impacts on soils would be mitigated through the phased implementation of earth-disturbing projects over a period of several years, and the use of erosion and sediment control measures specified in project-related erosion and sediment control plans, SWPPP, and Construction General Permits, as applicable. Construction and demolition activities associated with Alternative 4 would disturb approximately six acres in Fort Hunt Park, including three acres of soil disturbance due to the Realignment Option. Alternative 4 would increase impervious surfaces within the park by approximately two acres in the long term. Therefore, Alternative 4 would have minor long-term adverse impacts on soils and, when combined with the cumulative projects, the Alternative 4 would have long-term minor adverse cumulative impacts on soils.

IMPACTS OF ALTERNATIVE 5: GATEWAY VISITOR SERVICES (PREFERRED ALTERNATIVE)

Alternative 5: Gateway Visitor Services includes elements that would result in soil disturbance. A new visitor services zone with a kiosk, wayside, and/or visitor services facility would be installed at the NCO quarters and/or the repurposed office space at Picnic Pavilion A. A parking area would be expanded near the NCO quarters. Like Alternative 4, as part of the Roadway Realignment Option, Alternative 5 would remove Area E parking and restrooms. The Area D Ballfield would be re-vegetated, and a portion of the Area D parking would be removed. Two portions of the loop roadway would be relocated as part of the Roadway Realignment Option.

Localized construction-related earth disturbance and vegetation removal associated with the projects included in Alternative 5 would, to varying degrees, result in the short-term alteration of soil layer structure, soil compaction, increased erosion and sedimentation from wind and water, and generation of fugitive dust. In accordance with Fairfax County's erosion and sediment control regulations, construction contractors would prepare an erosion and sediment control plan, and implement and maintain erosion and sediment control measures for projects involving 2,500 square feet or more of soil disturbance. Such measures, which could include silt fences, storm drain dams, sweeping or wetting soils inadvertently deposited on paved areas, and wetting or vegetating soils that would remain exposed for extended periods, would minimize the migration of sediments from the project site. In addition, the contractor would be required to prepare a SWPPP and obtain coverage under the Construction General Permit for projects involving one acre or more of earth disturbance. The Construction General Permit and SWPPP would specify additional measures for minimizing pollutants and sediments carried by stormwater from the project site.

It is likely that staging for construction-related materials and equipment, and parking for construction workers' vehicles, would be provided at the existing Fort Hunt Park maintenance facility. If this is determined to be impractical, or if the space required exceeds what is available at the maintenance facility, staging and construction vehicle parking would be provided in proximity to the project sites in previously-disturbed areas of the park to avoid or minimize impacts on undisturbed soils, vegetation, and other sensitive park resources. Such areas could include portions of existing paved parking areas or within the limits of disturbance of an

active project. Stabilized vehicle entrances to the project sites would be established to minimize impacts from erosion and sedimentation.

Overall, approximately four acres of soils in Fort Hunt Park would be disturbed through the implementation of Alternative 5, including approximately three acres disturbed due to implementation of the Realignment Option. Although adherence to the procedures described above and the requirements of erosion and sediment control plans, SWPPP and the Construction General Permit would not completely eliminate the migration of airborne or waterborne sediments, they would substantially minimize them. Further, the phased implementation of the projects over a period of several years would further minimize erosion and sedimentation impacts. Thus, short-term impacts on soils from construction-related erosion and sedimentation would be minor.

Disturbed areas not paved or otherwise developed would be vegetated following the completion of each project, thereby minimizing soil erosion and maintaining soil permeability. The sites of the Area E parking lot and restrooms, and the segments of the loop road in Areas D and E that would be removed as part of the loop road realignment, would be returned to a permeable condition following the completion of those projects as part of the Roadway Realignment Option. Similarly, the re-vegetation of the ballfield in Area D under the Roadway Realignment Option would improve soil permeability in that area of the park by removing compacted soils underlying the ballfield and replacing them with vegetation. Although the restoration of the historic sightline to the Potomac River from Battery Robinson would involve soil disturbance of approximately 0.1 acre associated with the thinning or removal of trees and vegetation, no new impermeable surface would be created; rather, areas where existing vegetation would be removed would be replanted with native vegetation, thereby maintaining soil permeability. Additionally, the correction of trail erosion and the reseeding of some social trails would minimize erosion and sedimentation impacts. Overall, Alternative 5 would result in a net gain of approximately one acre of impervious surface within Fort Hunt Park. Therefore, the implementation of Alternative 5 would have minor long-term adverse impacts on soils.

Cumulative Impacts

The cumulative projects for Alternative 5 would be the same as those described in the No Action Alternative. As described above, long-term impacts on soils resulting from the implementation of Alternative 5 would be minor. Thus, Alternative 5 would have the potential to contribute to cumulatively adverse impacts on soils potentially resulting from other past, present, and reasonably foreseeable future projects in the vicinity of Fort Hunt Park.

Conclusion

Under Alternative 5, minor short-term construction-related impacts on soils would be mitigated through the phased implementation of earth-disturbing projects over a period of several years, and the use of erosion and sediment control measures specified in project-related erosion and sediment control plans, SWPPP, and Construction General Permits, as applicable. Construction and demolition activities associated with Alternative 5 would disturb approximately four acres of soils in Fort Hunt Park, including the Realignment Option that would disturb approximately three additional acres. Alternative 5 would increase impervious surfaces within the park by approximately one acre over the long term. Therefore, Alternative 5 would have minor long-term adverse impacts on soils and when combined with the cumulative projects, would have long-term minor adverse cumulative impacts on soils.

VEGETATION

Methodology and Assumptions

Impacts on vegetation are based on general characteristics of conditions in Fort Hunt Park and consideration of the encroachment and removal of vegetation that would result from the implementation of the proposed alternatives.

Study Area

The study area for vegetation constitutes the entirety of Fort Hunt Park.

Impact Thresholds

Negligible: No native vegetation would be affected or some individual native plants could be affected as a result of the alternative, but there would be no effect on native species populations. The effects would be on a small scale and no species of special concern would be affected.

Minor: The alternative would affect some individual native plants and would also affect a relatively minor portion of that species' population. Mitigation to offset adverse effects, including special measures to avoid affecting species of special concern and on-site replacement of all trees removed over six inches diameter at breast height (DBH), could be required and would be effective.

Moderate: The alternative would affect some individual native plants and would also affect a sizeable segment of the species' population and over a relatively large area. Mitigation to offset adverse effects could be extensive, but would likely be successful. Some species of special concern could also be affected. The loss of trees over six inches Diameter at Breast Height (DBH) would be mitigated on site.

Major: The alternative would have a considerable effect on native plant populations, including species of special concern, and affect a relatively large area in and out of the park. Mitigation measures to offset the adverse effects would be required, extensive, and success of the mitigation measures would not be guaranteed. The loss of trees over six inches DBH will be mitigated on site.

Duration: Short-term impacts would result in recovery in less than three years; Long-term impacts would take more than three years to recover.

IMPACTS OF ALTERNATIVE 1: NO ACTION

Under Alternative 1: No Action Alternative, no new facilities would be constructed and no vegetation would be disturbed. Existing native vegetation management practices at Fort Hunt Park would continue under applicable NPS guidance and regulations. Therefore, the No Action Alternative would have no impacts on vegetation.

Cumulative Impacts

Other past, present and reasonably foreseeable future projects occurring within the vicinity of Fort Hunt Park could result in adverse impacts on vegetation within the geographic boundary for cumulative projects. The GWMP North Section Rehabilitation, the proposed Potomac Yards Metrorail Station, projects included in the

Fort Belvoir Real Property Master Plan, site access improvements at George Washington's Mount Vernon, and projects implemented in fulfillment of the Fairfax County Master Plan/Area Plan could result in adverse impacts as vegetation is cleared from project sites to construct new facilities or expand existing facilities. Other projects, such as the restoration of Dyke Marsh, and the implementation of projects in accordance with the Chesapeake Bay Bald Eagle Recovery Plan and Virginia Coastal Zone Management Program, would likely have few or no adverse impacts on vegetation because they would generally avoid disturbance, or would include the planting, of native vegetation. As noted above, the No Action Alternative would result in no impacts on vegetation. Therefore, the No Action Alternative would not contribute to cumulative impacts on vegetation.

Conclusion

The continuation of native vegetation management practices at Fort Hunt Park would continue under the No Action Alternative, resulting in no impacts on vegetation. The No Action Alternative would not cumulatively contribute to impacts on vegetation.

IMPACTS OF ALTERNATIVE 4: INTERIOR VISITOR SERVICES

Under Alternative 4: Interior Visitor Services, a new visitor services zone with a kiosk, wayside, and/or visitor services facility, along with restrooms, would be installed. Parking and picnic areas in Area C would be removed. Area E parking and restrooms would be removed, allowing for new vegetation. The Area D Ballfield would be re-vegetated, and a portion of the Area D parking would be removed. Two portions of the loop roadway would be relocated as part of the Roadway Realignment Option. (Note: Impacts on native vegetation resulting from the construction of the proposed visitor facilities in Area C will be analyzed in future NEPA documentation prepared for that project and are not discussed in this EA.)

In the short term, the implementation of Alternative 4 would require the removal of approximately three acres of trees, understory shrubs and grasses for the Roadway Realignment Option that would relocate the loop road in Area D and Area E. While adverse, these effects would occur on the individual – rather than the community or species – level, and would be limited to common species as opposed to rare or protected species. The thinning and/or clearing of vegetation under Alternative 4 would also include the removal of individual specimens of non-native invasive plant species, particularly of approximately 5,500 square feet in the area near Battery Robinson where the historic sightline to the Potomac River would be restored. It is estimated that approximately 23 trees would be removed in order to restore the sight line.

The loss of an estimated 373 trees (approximately 350 trees through the Roadway Realignment Option and 23 trees through the restoration of the historic Battery Robinson sightline) greater than six inches DBH would be mitigated through the implementation of Alternative 4 by planting new trees within Fort Hunt Park in accordance with NPS's tree mitigation policies. Evaluation of large trees and development of a Tree Preservation Plan by an arborist or licensed tree expert, installation of tree protection fencing, root pruning for trees whose critical root zones (CRZs) lie within a proposed construction area, and staging construction equipment to avoid damage to park vegetation would be implemented to mitigate potential adverse impacts.

Generally, the amount of vegetation that would be disturbed in Fort Hunt Park during the implementation of Alternative 4 would be minimal in the context of the quantity of vegetation within the park and its vicinity. In addition, the phased implementation of the projects over a period of several years would further minimize

impacts on vegetation. The reseeding of some social trails would add vegetation worn away by visitor use in areas. In the long-term, none of the proposed facilities or activities included in Alternative 4 involves the disturbance or expansive clearing of park vegetation, other than for routine management, as part of their operation. For these reasons, Alternative 4 would have negligible short-term adverse impacts and long-term negligible impacts on vegetation.

Cumulative Impacts

The cumulative projects for Alternative 4 would be the same as those described in the No Action Alternative. As described above, short-term adverse impacts on vegetation resulting from the implementation of Alternative 4 would be mitigated to negligible levels, and would not result in long-term adverse impacts. Therefore, Alternative 4 would have no potential to contribute to adverse cumulative impacts on vegetation in the vicinity of Fort Hunt Park.

Conclusion

Short-term adverse impacts on vegetation at Fort Hunt Park resulting from the implementation Alternative 4 would be mitigated to negligible levels. None of the proposed projects and activities included in Alternative 4 would have long-term adverse impacts on vegetation. Alternative 4 would not contribute to adverse cumulative impacts on vegetation in the vicinity of Fort Hunt Park.

IMPACTS OF ALTERNATIVE 5: GATEWAY VISITOR SERVICES (PREFERRED ALTERNATIVE)

Under Alternative 5: Gateway Visitor Services, a new visitor services zone with a kiosk, wayside, and/or visitor services facility would be installed at the NCO quarters and/or the repurposed office space at Picnic Pavilion A. The small parking area near the NCO quarters would be expanded. Like Alternative 4, Alternative 5 would implement the Roadway Realignment Option, which would remove Area E parking and restrooms. The Area D Ballfield would be re-vegetated, and a portion of the Area D parking would be removed. Two portions of the loop roadway would be relocated as part of the Roadway Realignment Option.

In the short term, approximately three acres of trees, understory shrubs, and grasses would be removed as part of the implementation of Alternative 5 to accommodate the Roadway Realignment Option relocation of the loop road in Area D and Area E. While this would be an adverse impact on vegetation, it would occur on the individual – rather than the community or species – level, and would be limited to common species rather than rare or protected species. The thinning and/or clearing of vegetation under Alternative 5 would also include the removal of individual specimens of non-native invasive plant species, particularly in approximately 5,500 square feet in the area near Battery Robinson where the historic sightline to the Potomac River would be restored, thereby resulting in a beneficial effect on vegetation in the park. However, the removal of the approximately 5,500 square feet would likely result in the removal of an estimated 23 trees.

Trees greater than six inches DBH lost through the implementation of Alternative 5, estimated to be approximately 350 trees (approximately 350 trees through the Roadway Realignment Option and 23 trees through the restoration of the historic Battery Robinson sightline), would be mitigated by planting new trees within Fort Hunt Park in accordance with NPS's tree mitigation policies. Evaluation of large trees and

development of a Tree Preservation Plan by an arborist or licensed tree expert; installation of tree protection fencing; root pruning for trees whose critical root zones (CRZs) lie within a proposed construction area; and staging construction equipment to avoid damage to park vegetation would be implemented to mitigate potential adverse impacts.

Generally, the amount of vegetation that would be disturbed in Fort Hunt Park during the implementation of Alternative 5 would be minimal in the context of the quantity of vegetation within the park and its vicinity. In addition, the phased implementation of the projects over a period of several years would further minimize impacts on vegetation. Additionally, the reseeding of some social trails would add vegetation worn away by visitor use in areas. None of the proposed facilities or activities included in Alternative 5 involves the disturbance or clearing of park vegetation, other than for routine management, as part of their long-term operation. Therefore, Alternative 5 would have short-term negligible adverse impacts and long-term negligible adverse impacts on vegetation.

Cumulative Impacts

The cumulative projects for Alternative 5 would be the same as those described in the No Action Alternative. Adverse short-term impacts on vegetation resulting from the implementation of Alternative 5 would be mitigated to negligible levels, and there would be no long-term adverse impacts. For these reasons, Alternative 5 would have no potential to contribute to adverse cumulative impacts on vegetation in the vicinity of Fort Hunt Park.

Conclusion

Short-term adverse impacts on vegetation at Fort Hunt Park resulting from the implementation Alternative 5 would be mitigated to negligible levels. None of the proposed projects and activities included in Alternative 5 would have long-term adverse impacts on vegetation. Alternative 5 would not contribute to adverse cumulative impacts on vegetation in the vicinity of Fort Hunt Park.

WILDLIFE AND ITS HABITAT

Methodology and Assumptions

NPS is dedicated to preserving the natural abundances, diversities, dynamics, distributions, habitats, and behaviors of native animal populations and the communities in which they occur. Impacts on wildlife and habitat are based on information obtained from NPS natural resource managers, USFWS, and the Virginia Department of Conservation and Recreation (VADCR).

Study Area

The study area for wildlife and habitat consists of the entirety of Fort Hunt Park and contiguous forested areas along the GWMP.

Impact Thresholds

Negligible: There would be no observable or measurable impacts on native species, their habitats, or the natural processes sustaining them. Impacts would be well within natural fluctuations.

Minor: Impacts would be detectable, but they would not be expected to be outside the natural range of variability of native species' populations, their habitats, or the natural processes sustaining them. Mitigation measures, if needed to offset adverse effects, would be simple and successful.

Moderate: Breeding animals of concern are present; animals are present during particularly vulnerable life-stages, such as migration or juvenile stages; mortality or interference with activities necessary for survival can be expected on an occasional basis, but is not expected to threaten the continued existence of the species in the park unit. Impacts on native species, their habitats, or the natural processes sustaining them would be detectable, and they could be outside the natural range of variability. Mitigation measures, if needed to offset adverse effects, would be extensive and likely successful.

Major: Impacts on native species, their habitats, or the natural processes sustaining them would be detectable, and they would be expected to be outside the natural range of variability. Key ecosystem processes might be disrupted. Loss of habitat might affect the viability of at least some native species. Extensive mitigation measures would be needed to offset any adverse effects and their success would not be guaranteed.

Duration: Short-term impacts last for the duration of construction related activities, while long-term impacts last beyond the proposed construction activities.

IMPACTS OF ALTERNATIVE 1: NO ACTION

Under the No Action Alternative, existing conditions at Fort Hunt Park would continue with no new disturbance to wildlife and its habitat. Therefore, Alternative 1 would result in no short-term or long-term impacts on wildlife and its habitat at Fort Hunt Park or its vicinity.

Cumulative Impacts

Other past, present, and reasonably foreseeable future actions occurring within the vicinity of Fort Hunt Park could result in adverse impacts on wildlife and habitat within the geographic boundary for cumulative projects. The GWMP North Section Rehabilitation, the proposed Potomac Yards Metrorail Station in the City of Alexandria, projects included in the Fort Belvoir Real Property Master Plan, site access improvements at George Washington's Mount Vernon, and projects implemented in fulfillment of the Fairfax County Comprehensive Plan/Area Plan could have adverse impacts on wildlife and habitat as project sites are disturbed and vegetation providing such habitat is cleared to construct new facilities or expand existing facilities. Other projects, such as the restoration of Dyke Marsh and the implementation of projects in accordance with the Chesapeake Bay Bald Eagle Recovery Plan and Virginia Coastal Zone Management Program, would likely have few or no adverse impacts on wildlife and habitat because they would generally avoid disturbance, or would include the planting of vegetation that provides habitat for wildlife. Because the No Action Alternative would have no short-term or long-term impacts on wildlife and its habitat, there would be no cumulative impacts.

Conclusion

The continuation of existing conditions at Fort Hunt Park under the No Action Alternative would have no short-term or long-term impacts on wildlife and its habitat, and no adverse cumulative impacts.

IMPACTS OF ALTERNATIVE 4: INTERIOR VISITOR SERVICES

Under Alternative 4: Interior Visitor Services, a new visitor services zone with a kiosk, wayside, and/or visitor services facility, along with restrooms, would be installed. Parking and picnic areas in Area C would be removed; Picnic Pavilion C could be removed. Area E parking and restrooms would be removed, allowing for new vegetation. With the roadway realignment option, the Area D Ballfield would be re-vegetated, and a portion of the Area D parking would be removed. Two portions of the loop roadway would be relocated as part of the Roadway Realignment Option.

Habitat and Common Species of Wildlife

Construction and demolition activities associated with the implementation of Alternative 4 involving the clearing of vegetation, demolition and/or site grading, including through the Roadway Realignment Option, could disturb wildlife and alter nesting, foraging, and/or breeding patterns. Such activities would have the potential to drive mobile individual specimens from the immediate area, while some less-mobile or sedentary specimens could be inadvertently destroyed. These activities would also disturb and remove vegetation providing habitat for wildlife in the park.

While such impacts would be adverse, they would last only for the duration of the construction and demolition activities, and would cease once the park returned to a pre-construction condition following the completion of those activities. Generally, the areas that would be affected by the proposed activities would be small in the context of the park; thus, the quantity of vegetation potentially providing habitat that would be disturbed during the construction and demolition activities would be similarly small in the context of the amount of vegetation within the park and its vicinity. No areas of unique or valuable habitat would be disturbed by the proposed projects. The preparation of and adherence to tree save plans would further minimize impacts on vegetation providing habitat for wildlife.

It is likely that the number of individual specimens of wildlife that would be inadvertently destroyed during the construction and demolition activities would remain small, as most animals would vacate the project sites and their surrounding areas as the presence of humans and equipment, and the intensity of activities increased. Individual animals driven from the sites by the activities, or animals similar to those driven away, would likely return to those areas following the completion of the projects. The phased implementation of the projects over a period of several years would further minimize impacts. None of the proposed projects would disturb wetlands, or the wildlife habitat they provide. The implementation of and adherence to erosion and sediment control measures and pollution control measures specified in erosion and sediment control plans and construction SWPPPs would minimize sediment and pollutant runoff from the project sites and degradation of downstream aquatic habitats. The replanting of vegetation for trees and other plants that would be lost as a result of the proposed projects, as well as the re-vegetation of areas currently used for other purposes and activities, would mitigate habitat lost during the implementation of the proposed action. Therefore, although short-term impacts on wildlife resulting from the implementation of Alternative 4 would be adverse, they would remain negligible.

Alternative 4 would have no impacts on the colony of ground-nesting bees near Parking Area B because none of the proposed projects would occur in that area. While construction and demolition activities associated with Alternative 4 may inadvertently destroy individual specimens of invertebrates in the park, resulting in an

adverse impact, such impacts would occur at the individual rather than species level. Thus, short-term impacts on invertebrates at Fort Hunt Park resulting from the implementation of Alternative 4 would be negligible.

None of the proposed projects and activities included in Alternative 4 would involve the disturbance of wildlife — including invertebrates — or their habitat in Fort Hunt Park as part of park operation. Therefore, the implementation of Alternative 4 would have negligible long-term adverse impacts on wildlife and their habitat.

Cumulative Impacts

The cumulative projects for Alternative 4 would be the same as those described for the No Action Alternative. Because it would have negligible long-term adverse impacts on wildlife and its habitat, Alternative 4 would have no potential to contribute to adverse cumulative impacts.

Conclusion

Alternative 4 would have negligible short-term impacts on wildlife and its habitat, and negligible long-term impacts. There would be no adverse cumulative impacts on wildlife and its habitat.

IMPACTS OF ALTERNATIVE 5: GATEWAY VISITOR SERVICES (PREFERRED ALTERNATIVE)

Under Alternative 5: Gateway Visitor Services, a new visitor services zone with a kiosk, wayside, and/or visitor services facility would be installed at the NCO quarters and/or the repurposed office space at Picnic Pavilion A. The small parking area near the NCO quarters would be expanded. Like Alternative 4, Alternative 5 would remove Area E parking and restrooms. The Area D Ballfield would be re-vegetated, and a portion of the Area D parking would be removed. Two portions of the loop roadway would be relocated as part of the Roadway Realignment Option.

Habitat and Common Species of Wildlife

Construction and demolition activities associated with the implementation of Alternative 5 involving the clearing of vegetation, demolition, and/or site grading, could disturb wildlife and alter nesting, foraging, and/or breeding patterns. Such activities would have the potential to drive mobile individual specimens from the immediate area, while some less-mobile or sedentary specimens could be inadvertently destroyed. These activities would also disturb and remove vegetation providing habitat for wildlife in the park.

Although these impacts would be adverse, they would last only for the duration of the construction and demolition activities, and would cease once the park returned to a pre-construction condition following the completion of those activities. Generally, the areas that would be affected by the proposed activities would be small in the context of the park; thus, the quantity of vegetation potentially providing habit that would be disturbed during the construction and demolition activities would be similarly small in the context of the amount of vegetation within the park and its vicinity. No areas of particularly unique or valuable habitat would be disturbed by the proposed projects. The preparation of and adherence to tree save plans would further minimize impacts on vegetation providing habitat for wildlife.

It is likely that the number of individual specimens of wildlife that would be inadvertently destroyed during the construction and demolition activities would remain small, as most animals would vacate the project sites and their surrounding areas as the presence of humans and equipment, and the intensity of activities, increased. Individual animals driven from the sites by the activities, or animals similar to those driven away, would likely return to those areas following the completion of the projects. The phased implementation of the projects over a period of several years would further minimize impacts. None of the proposed projects would disturb wetlands, or the wildlife habitat they provide. The implementation of and adherence to erosion and sediment control measures and pollution control measures specified in erosion and sediment control plans and construction SWPPPs would minimize sediment and pollutant runoff from the project sites and degradation of downstream aquatic habitats. The replanting of vegetation for trees and other plants that would be lost as a result of the proposed projects, as well as the re-vegetation of areas currently used for other purposes and activities, would mitigate habitat lost during the implementation of the proposed action. Therefore, although the implementation of Alternative 5 would have short-term adverse impacts on wildlife, those impacts would remain negligible.

Alternative 5 would have no impacts on the colony of ground-nesting bees near Parking Area B because none of the proposed projects would occur in that area. While construction and demolition activities associated with Alternative 5 may inadvertently destroy individual specimens of invertebrates in the park, resulting in an adverse impact, such impacts would occur at the individual rather than species level. Thus, short-term impacts on invertebrates at Fort Hunt Park resulting from the implementation of Alternative 5 would be negligible.

None of the proposed projects and activities would involve the disturbance of wildlife — including invertebrates — or their habitat in Fort Hunt Park as part of the park's long-term operation. Therefore, negligible long-term adverse impacts on wildlife and their habitat would result from the implementation of Alternative 5.

Cumulative Impacts

The cumulative projects for Alternative 5 would be the same as those described for the No Action Alternative. Because it would have negligible long-term adverse impacts wildlife and its habitat, Alternative 5 would have no potential to contribute to adverse cumulative impacts.

Conclusion

Alternative 5 would have negligible short-term impacts on wildlife and its habitat, and negligible long-term adverse impacts. There would be negligible adverse cumulative impacts on wildlife and its habitat.

RARE, THREATENED, AND ENDANGERED SPECIES

Methodology and Assumptions

As with common species of wildlife, the NPS is dedicated to preserving the natural abundances, diversities, dynamics, distributions, habitats, and behaviors of rare, threatened, and endangered species and their associated habitat. Impacts on rare, threatened, and endangered species are based on information obtained from NPS natural resource managers, USFWS, and VADCR.

Study Area

The study area for rare, threatened, and endangered species consists of the entirety of Fort Hunt Park and contiguous forested areas along the GWMP.

Impact Thresholds

Negligible: The action would result in a change to a population, individuals of a species, or designated critical habitat, but the change would be so small that it would not be of any measurable or perceptible consequence.

Minor: The action would result in a change to a population, individuals of a species, or designated critical habitat. The change would be measurable but small and localized and of little consequence.

Moderate: The action would result in a change to a population, individuals of a species, or designated critical habitat. The change would be measurable and of consequence.

Major: The action would result in a noticeable change to a population, individuals of a species, resource, or designated critical habitat.

IMPACTS OF ALTERNATIVE 1: NO ACTION

Under the No Action Alternative, existing conditions at Fort Hunt Park would continue with no new disturbance of rare, threatened, and endangered species. Therefore, Alternative 1 would have no short-term or long-term impacts on rare, threatened, and endangered species at Fort Hunt Park or its vicinity.

Cumulative Impacts

The No Action Alternative would have no short-term or long-term impacts on rare, threatened, and endangered species; therefore, it would have no potential to contribute to cumulative impacts on such species.

Conclusion

The No Action Alternative would have no short-term, long-term, or cumulative impacts on rare, threatened, and endangered species.

IMPACTS OF ALTERNATIVE 4: INTERIOR VISITOR SERVICES

Under Alternative 4: Interior Visitor Services, a new visitor services zone with a kiosk, wayside, and/or visitor services facility, along with restrooms, would be installed. Parking and picnic areas in Area C would be removed; Picnic Pavilion C could be removed. Approximately 5,500 square feet of vegetation, including up to 23 trees over 6 inches DbH located between Battery Robinson and the GWMP, would be removed, including invasive species. Area E parking and restrooms would be removed, allowing for new vegetation. With the roadway realignment option, the Area D Ballfield would be re-vegetated, and a portion of the Area D parking would be removed. Two portions of the loop roadway would be relocated as part of the Roadway Realignment Option.

Northern Long-eared Bat

The implementation of Alternative 4 would result in the clearing of trees that could potentially be used by the northern long-eared bat as summer roosting habitat, and/or displace specimens of the species using that vegetation for roosting. Noise and vibration associated with the clearing of vegetation in the vicinity of Battery Robinson would have the potential to disturb any bats using the battery as winter hibernacula.

As noted in Chapter 3, no specimens of the northern long-eared bat have been documented in Fort Hunt Park. To avoid adverse impacts on the northern long-eared bat during the implementation of Alternative 4, the NPS would adhere to time of year restrictions between June 1 and July 31 for the removal of vegetation that could potentially provide summer roosting habitat for the species. Further, the NPS would conduct surveys for the northern long-eared bat prior to implementing any projects that could potentially disturb the species' winter hibernacula. Ongoing consultation between the NPS and USFWS will comprehensively identify additional measures to avoid adverse impacts on the northern long-eared bat potentially resulting from the implementation of the proposed projects at Fort Hunt Park. For these reasons, Alternative 4 would have no short-term or long-term adverse impacts on the northern long-eared bat.

Tri-colored Bat and Little Brown Bat

Impacts on tri-colored bats and little brown bats potentially resulting from the implementation of Alternative 4 would be similar to those described above for the northern long-eared bat. As with that species, the NPS would adhere to time-of-year restrictions for the clearing of vegetation that could provide summer roosting habitat for tri-colored bats and little brown bats, and would conduct surveys for both species prior to the implementation of projects that could potentially disturb the species' winter hibernacula. Therefore, Alternative 4 would have no adverse impacts on tri-colored bats or little brown bats.

Bald Eagles

It is unlikely that the proposed optional realignment of the loop road and re-vegetation of the ballfield in Area D would be visible from the bald eagle nest at Fort Hunt Park due to the dense vegetation between the nest and the sites of those projects. The NPS would conduct further consultation with the USFWS prior to determining the most appropriate course of action to avoid disturbance of the nesting eagles, and would avoid implementing those projects during the nesting season between December and June if determined necessary. For these reasons, the implementation of Alternative 4 would comply with the Bald and Golden Eagle Protection Act and would have no adverse short-term effects on bald eagles at Fort Hunt Park.

None of the proposed projects and activities included in Alternative 4 would involve the disturbance of bald eagles or their nests in Fort Hunt Park as part of their operation. Therefore, the implementation of Alternative 4 would have negligible long-term adverse impacts on bald eagles.

Cumulative Impacts

Alternative 4 would have no short-term or long-term adverse impacts on rare, threatened, and endangered species. Thus, it would have no potential to contribute to cumulative impacts on such species.

Conclusion

Alternative 4 would have no short-term, long-term, or cumulative adverse impacts on rare, threatened, and endangered species.

IMPACTS OF ALTERNATIVE 5: GATEWAY VISITOR SERVICES (PREFERRED ALTERNATIVE)

Under Alternative 5: Gateway Visitor Services, a new visitor services zone with a kiosk, wayside, and/or visitor services facility would be installed at the NCO quarters and/or the repurposed office space at Picnic Pavilion A. The small parking area near the NCO quarters would be expanded. Like Alternative 4, Alternative 5 would remove Area E parking and restrooms. The Area D Ballfield would be re-vegetated, and a portion of the Area D parking would be removed. Approximately 5,500 square feet of vegetation, including up to 23 trees over 6 inches DbH located between Battery Robinson and the GWMP would be removed, including invasive species. Two portions of the loop roadway would be relocated as part of the Roadway Realignment Option.

Northern Long-eared Bat

The implementation of Alternative 5 would result in the clearing of trees that could potentially be used by the northern long-eared bat as summer roosting habitat, and/or displace specimens of the species using that vegetation for roosting. Noise and vibration associated with the clearing of vegetation in the vicinity of Battery Robinson would have the potential to disturb any bats using the battery as winter hibernacula.

As noted in Chapter 3, no specimens of the northern long-eared bat have been documented in Fort Hunt Park. To avoid adverse impacts on the northern long-eared bat during the implementation of Alternative 5, the NPS would adhere to time-of-year restrictions between June 1 and July 31 for the removal of vegetation that could potentially provide summer roosting habitat for the species. Further, the NPS would conduct surveys for the northern long-eared bat prior to implementing any projects that could potentially disturb the species' winter hibernacula. Ongoing consultation between the NPS and USFWS will comprehensively identify additional measures to avoid adverse impacts on the northern long-eared bat potentially resulting from the implementation of the proposed projects at Fort Hunt Park. For these reasons, Alternative 5 would have no short-term or long-term adverse impacts on the northern long-eared bat.

Tri-colored Bat and Little Brown Bat

Impacts on tri-colored bats and little brown bats potentially resulting from the implementation of Alternative 5 would be similar to those described above for the northern long-eared bat. As with that species, the NPS would adhere to time-of-year restrictions on the clearing of vegetation that could provide summer roosting habitat for tri-colored bats and little brown bats, and would conduct surveys for both species prior to the implementation of projects that could potentially disturb the species' winter hibernacula. Thus, Alternative 5 would have no adverse impacts on tri-colored bats or little brown bats.

Bald Eagles

It is unlikely that the proposed optional realignment of the loop road and re-vegetation of the ballfield in Area D would be visible from the bald eagle nest at Fort Hunt Park due to the dense vegetation between the nest and the sites of those projects. Further consultation between the NPS and USFWS would be conducted

prior to determining the most appropriate course of action to avoid disturbance of the nesting eagles, and the NPS would avoid implementing those projects during the nesting season between December and June if determined necessary. For these reasons, the implementation of Alternative 5 would comply with the Bald and Golden Eagle Protection Act and would have no adverse short-term effects on bald eagles at Fort Hunt Park.

None of the proposed projects and activities included in Alternative 5 would involve the disturbance of bald eagles or their nests in Fort Hunt Park as part of their operation. Therefore, the implementation of Alternative 5 would have negligible long-term adverse impacts on bald eagles.

Cumulative Impacts

Alternative 5 would have no adverse effects on rare, threatened, and endangered species. Thus, it would have no potential to contribute to cumulative impacts on such species.

Conclusion

Alternative 5 would have no short-term, long-term, or cumulative adverse impacts on rare, threatened, and endangered species.

CULTURAL RESOURCES

Guiding Regulations and Policies

The NHPA of 1966 governs federal agencies in their handling of historic properties. Section 106 of the Act requires that federal agencies take into account the effects of their actions on cultural resources. Under this provision, the NPS must evaluate effects to any district, site, building, structure, or object listed in or eligible for listing in the NRHP. Cultural resources are characterized as archeological resources, historic structures, and cultural landscapes. Historic properties, as defined by the implementing regulations of the NHPA (36 CFR800), are any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP. This term includes artifacts, records, and the remains that are related to and located within such properties, as well as traditional and culturally significant Native American sites and historic landscapes. Agencies must consult with the SHPO and the ACHP as required, and other interested parties in an effort to avoid, minimize, or mitigate adverse effects. In addition to the NHPA, protection and management of cultural resources held by the NPS is governed by *Directors Order #28: Cultural Resources Management Guidelines* (NPS 1988), NPS Management Policies (2006).

General Methodology and Assumptions

The NPS categorizes their cultural resources as archeological resources, cultural landscapes, historic structures and districts, museum objects, and ethnographic resources. Potential impacts on historic structures and districts, cultural landscapes, and archeological resources are of concern for this project. There would be no impacts museum collections or ethnographic resources.

The analyses of effects on cultural resources that are presented in this section respond only to the requirements of NEPA. In this Environmental Assessment, impacts to cultural resources are described in terms of type, context, duration, and intensity, which is consistent with the regulations of the Council on

Environmental Quality (CEQ) that implement the National Environmental Policy Act (NEPA). A separate Assessment of Effect documentation effort was completed in conjunction with the EA. The effects to historic properties in accordance with Section 106 of NHPA will occur as individual undertakings are determined as laid out in Chapter 5 of this document.

The NPS guide for evaluating impacts, DO-12 (NPS 2001), requires that impact assessment be scientific, accurate, and quantified to the extent possible. For cultural resources, it is rarely possible to measure impacts in quantifiable terms; therefore, impact thresholds must rely on the professional judgment of resource experts.

Area of Potential Effect

For the proposed undertaking, the Area of Potential Effect (APE) is the Fort Hunt Park boundary. The historic structures located within the APE are presented in Figure 9 in Chapter 3 and are described in the following sections. Archeological resources located within the APE are considered confidential information and are not presented in this document. The APE was determined by the visual influence of proposed actions identified in the SDP and approved by the NPS and VDHR.

HISTORIC STRUCTURES AND DISTRICTS

Methodology and Assumptions

This section addresses impacts to historic properties listed in or determined eligible for the NRHP. At Fort Hunt Park, these include listed historic districts and historic structures. A district is defined by the NRHP as "a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development." The NRHP defines a structure as "functional construction made usually for purposes other than creating human shelter."

The analysis of impacts on historic structures and districts presented in this section responds to the requirements of NEPA, as previously described. Chapter 5 outlines the NPS's commitment to complete additional assessment of individual project plans associated with the SDP as they are developed in more detail.

Study Area

The study area for cultural resources, including historic structures and districts, is the APE defined by the NPS under Section 106 regulations (see Chapter 3: Affected Environment). As indicated in Chapter 3, the APE for historic resources encompasses all historic properties that could be affected by the proposed action. Due to the nature of the undertaking and its location entirely within the park, the potential effects would be limited to Fort Hunt Park, its contributing resources, and the George Washington Memorial Parkway.

The undertaking has the potential to affect three historic districts listed in the NRHP: Fort Hunt Park Historic District, the George Washington Memorial Parkway Historic District, and the Mount Vernon Memorial Highway Historic District.

Impact Thresholds

For an historic structure or district to be listed in the NRHP, it must possess significance and the features that convey its significance must have integrity. For purposes of evaluating potential impacts on historic structures and districts, the thresholds of change are defined as follows:

Negligible: The impact is at the lowest level of detection with neither adverse nor beneficial consequences.

Minor: Alteration of the patterns or features of a historic structure or district would not diminish the integrity of the character defining features or the overall integrity of the historic property.

Moderate: The project would alter the character defining features of the historic structure or district and diminish the integrity of the features of the historic property.

Major: The project would alter the character defining features of the historic structure or district and severely diminish the integrity of the features and the overall integrity of the historic property.

Duration: Short-term impacts last for the duration of construction related activities, while long-term impacts last beyond the proposed construction activities.

IMPACTS OF ALTERNATIVE 1: NO ACTION

Alternative 1: No Action would not introduce any large-scale changes or remove any historic listed features that contribute to existing historic districts, resulting in a negligible impact on historic districts. However, long-term deterioration of their contributing features has the potential to result in long-term minor adverse impacts to districts.

Under the No Action Alternative, the current active recreational use of the park by visitors would be expected to continue, resulting in incremental deterioration of historic structures. Under this alternative, the NCO Quarters would remain in its present condition and would continue to be closed to the public. The batteries would continue to be subjected to potential damage from park visitors climbing on structures as well as natural deterioration from wind, moisture, and weather. NPS would protect districts and structures to ensure the integrity of the resources would not be diminished to a level that would constitute more than a minor adverse impact.

Cumulative Impacts

Other past, present, and reasonably foreseeable future actions have or could have adverse cumulative impacts on historic districts and structures in the study area. Dyke Marsh Wetland Restoration would have overall beneficial impacts on historic structures and districts due to the stabilization of marsh along the GWMP. The GWMP North Section Rehabilitation would have an overall adverse impact on historic structures through potential changes to the historic guardwalls as part of the safety improvements. Site access improvements at George Washington's Mount Vernon could potentially have adverse impacts due to visibility along the GWMP and Mount Vernon Memorial Parkway. The Potomac Yard Metrorail Station project could potentially have an adverse impact on historic structures due to the visibility of the project from the GWMP. Implementation of the Fairfax County Comprehensive Plan could have adverse impacts on historic districts and structures due to new development and redevelopment in the Fort Hunt Sector of the county.

As described above, the No Action Alternative would have long-term minor adverse impacts on historic districts and structures. Therefore, the No Action Alternative would result in long-term minor adverse cumulative impacts.

Conclusion

Under the No Action Alternative, the NPS would maintain and preserve historic structures and contributing elements of historic districts; however, there would be no expected change to current management strategies or uses for these features. Structures would not be rehabilitated or adapted for reuse; they would remain vulnerable to incremental deterioration over time. The No Action Alternative would result in long-term minor adverse impacts to historic structures and districts. The alternative would also result in long-term minor adverse cumulative impacts to historic structures and districts.

IMPACTS OF ALTERNATIVE 4: INTERIOR VISITOR SERVICES

Under Alternative 4, the potentially-contributing restroom structure at Parking Area E would be removed, as would non-contributing parking and Ballfield D features. Picnic Pavilion C could be removed. Parking areas and the ballfield would be re-vegetated. Some of these structures may be Mission 66-era resources that have not yet been evaluated would be adversely affected. Non-contributing pavilions could be removed, potentially improving the integrity of the setting for contributing buildings and structures. An evaluation of NRHP eligibility of park resources potentially significant for their association with the Mission 66 program, including the picnic pavilion at Area A; the Area C and E restrooms and associated ornamental plantings; the loop road, parking areas and other elements of the circulation system; and the ballfields would be undertaken prior to implementation.

Construction activities would not directly alter the existing structures. Construction equipment would block views of historic structures as improvements are made. However, the primary areas of construction would not be near the contributing elements of Fort Hunt Park historic district. Such changes would be temporary in nature. As a result, Alternative 4 could result in short-term minor impacts on Fort Hunt Park.

The establishment of a Visitor Services Zone in the location of Parking Area C would not noticeably alter the historic districts and does not physically alter any of the contributing elements of the historic districts. The setting of Fort Hunt Park historic district would be enhanced by the reestablishment of the historic view corridor from Battery Robinson to the Potomac River. Changes within the Fort Hunt Park would not be detectable from the GWMP and Mount Vernon Memorial Highway historic districts. Therefore, Alternative 4 would result in long-term beneficial and potentially moderate adverse impacts on the Fort Hunt Park historic district and long-term negligible impacts on the GWMP and the Mount Vernon Memorial Highway historic districts.

Cumulative Impacts

The cumulative projects for Alternative 4 would be the same as those described in the No Action Alternative. As described above, Alternative 4 would have short-term minor adverse impacts and long-term beneficial impacts on Fort Hunt Park historic district and negligible impacts on the GWMP and Mount Vernon Memorial Highway historic districts. Therefore, Alternative 4 would result in beneficial and negligible cumulative impacts.

Conclusion

The removal of potentially-contributing features within the landscape such as ballfield features and picnic pavilions could result in moderate adverse impacts on the Fort Hunt Park historic district; removal of non-contributing features would result in beneficial impacts to the Fort Hunt Park historic district, but would not be detectable from the other historic districts. The creation of open views where historic views have been overgrown would be beneficial. Overall, the actions proposed by the NPS as part of Alternative 4 would have long-term beneficial impacts and potentially moderate adverse impacts on the Fort Hunt Park historic district and negligible impacts on the GWMP and Mount Vernon Memorial Highway historic districts. Alternative 4 would result in beneficial and moderate adverse cumulative impacts.

IMPACTS OF ALTERNATIVE 5: GATEWAY VISITOR SERVICES (PREFERRED ALTERNATIVE)

Alternative 5 includes similar actions to Alternative 4, with one substantial difference: the Visitor Services Zone would be located at the NCO Quarters, and would involve the rehabilitation of the structure as a visitor facility with the expansion of a small parking area. As in Alternative 4, these structures may be Mission 66-era resources that have not yet been evaluated would be adversely affected. Non-contributing pavilions could be removed, potentially improving the integrity of the setting for contributing buildings and structures. An evaluation of NRHP eligibility of park resources potentially significant for their association with the Mission 66 program, including the picnic pavilion at Area A; the Area C and E restrooms and associated ornamental plantings; the loop road, parking areas and other elements of the circulation system; and the ballfields would be undertaken prior to implementation.

Construction activities would directly alter the existing NCO Quarters during the adaptation of the building to a visitor use facility. Construction equipment would block views of historic structures as improvements are made, including the expansion of a small parking area next to the NCO Quarters. Such changes would be temporary in nature. As a result, Alternative 5 could result in short-term moderate impacts on Fort Hunt Park.

Although Picnic Pavilion A is not currently recognized as a contributing resource, it is potentially historic for its association with the Mission 66 program; it has not yet been formally evaluated, although it is noted in the 2012 National Register Multiple Property Listing Form as an example of a significant building type and design associated with Mission 66. Alternative 5 would result in limited changes to the interior and exterior of the pavilion. As with the NCO Quarters, the NPS would be expected to undertake the rehabilitation according to policy that would limit the potential for incompatible changes to the building and its surroundings, and work would follow the *Secretary of the Interior's Standards*.

The adaptive reuse of the NCO Quarters would result in noticeable changes to the structure and its immediate surroundings. The interior of the building would be rehabilitated with new features to support visitor use. The exterior would remain similar to its current appearance, but the NPS would add necessary features in its immediate setting, such as HVAC or other equipment, accessibility features like handrails, and signage. These new elements, in addition to the expansion of the small parking area, would result in noticeable modifications to the exterior vicinity of the NCO Quarters, as well as its interior. The NPS would undertake the rehabilitation according to the *Secretary of Interior's Standards* that would limit the potential

for incompatible changes to the building and its surroundings. However, the rehabilitation would also involve repairs and restoration of some aspects of the historic building's fabric, as well as a desirable change from its current disused status to an active, compatible new use.

Other elements of the site design plan are common to both Alternatives 4 and 5, including the removal and/or relocation of parking, removal of restroom facilities, re-vegetation of Ballfield D, and the optional loop road realignment. As a result, impacts from these elements on historic districts and structures would be similar to those described above in Alterative 4. Therefore, Alternative 5 would result in long-term moderate adverse and beneficial impacts on the Fort Hunt Park historic district due to the alterations of the NCO Quarters, potential removal of Mission 66 features, and alterations to Picnic Pavilion A; and negligible impacts on the GWMP and Mount Vernon Memorial Highway historic districts.

Cumulative Impacts

The cumulative projects for Alternative 5 would be the same as those described in the No Action Alternative. As described above, Alternative 5 would have long-term moderate adverse and beneficial impacts on Fort Hunt Park historic district. Therefore, when combined with cumulative projects, Alternative 5 would result in long-term moderate adverse and beneficial cumulative impacts on Fort Hunt Park historic district.

Conclusion

Alternative 5 would adaptively reuse the historic NCO Quarters and would remove some non-contributing elements of the park. Under Alternative 5, proposed actions would result in short- and long-term moderate adverse impacts and long-term beneficial impacts on the Fort Hunt Park historic district and negligible impacts on the GWMP and Mount Vernon Memorial Highway historic districts. Alternative 5 would result in long-term moderate adverse and beneficial cumulative impacts on Fort Hunt Park historic district.

CULTURAL LANDSCAPES

Methodology and Assumptions

Cultural landscapes, are defined by The Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes* as "a geographic area (including both cultural and natural resources and the wildlife or domestic animals therein) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values." The proposed alternatives have the potential to affect, directly or indirectly, one individually significant cultural landscape: Fort Hunt Park. A CLI was completed by the NPS for Fort Hunt Park in 2001, and revised in 2004. The cultural landscape's contributing resources identified by the CLI are detailed in Chapter 3.

The analysis of impacts on cultural landscapes presented in this section responds to the requirements of NEPA as previously described. Chapter 5 outlines the NPS commitment to complete additional assessment of individual project plans associated with the SDP as they are developed in more detail. In some cases, restoring a historical land use, such as recreation, is a beneficial impact to the cultural landscape as the case with the SDP and this described in the visitor use and experience analysis.

Study Area

The study area is the extent of the cultural landscape as defined in the CLI and described in the Cultural Landscape section of Chapter 3; it is effectively the same as the APE for the project, encompassing Fort Hunt Park and the adjacent segments of the George Washington Memorial Parkway and Mount Vernon Memorial Highway. The CLI documents contributing features of the landscape include buildings and structures, circulation features, land use activities, small-scale features, vegetation, and views.

Impact Thresholds

For a cultural landscape to be listed in the NRHP, it must possess significance and the features that convey its significance must have integrity. For purposes of evaluating potential impacts on cultural landscapes, the thresholds of change are defined as follows:

Negligible: The impact is at the lowest level of detection with neither adverse nor beneficial consequences.

Minor: Alteration of the patterns or features of a cultural landscape would not diminish the integrity of the character defining features or the overall integrity of the historic property.

Moderate: The project would alter the character defining features of the cultural landscape and diminish the integrity of the features of the historic property.

Major: The project would alter the character defining features of the cultural landscape and severely diminish the integrity of the features and the overall integrity of the historic property.

Duration: Short-term impacts last for the duration of construction related activities, while long-term impacts last beyond the proposed construction activities.

IMPACTS OF ALTERNATIVE 1: NO ACTION

Under Alternative 1: No Action, the current heavy visitor use of the park for active recreation would be expected to continue, with use levels that often overwhelm park infrastructure, resulting in the incremental deterioration of the landscape. Under this alternative, buildings and structures would see the same impacts as described above in Historic Structures and Districts, with minor adverse impacts from incremental deterioration. Over time, contributing vegetation and circulation features would be expected to decline or suffer incremental damage similar to what would be expected for buildings and structures. However, based on agency policy regarding cultural resources, NPS would protect contributing landscape features to ensure the integrity of the resources would not be diminished to a level that would constitute more than a minor adverse impact. The spatial organization patterns that contribute to the cultural landscape would not be altered, and would be maintained as they are currently.

Overall, the No Action Alternative would result in long-term minor adverse impacts on Fort Hunt Park's cultural landscape because contributing historic resources would continue to slowly deteriorate due to high levels of visitor use and weathering.

Cumulative Impacts

Other past, present, and reasonably foreseeable future actions have or could have adverse cumulative impacts to cultural landscape of Fort Hunt Park. Implementation of the Fairfax County Comprehensive Plan could have adverse impacts due to new development and redevelopment in the Fort Hunt Sector of the county. Site access improvements at George Washington's Mount Vernon could potentially have adverse impacts due to visibility along the GWMP and Mount Vernon Memorial Parkway.

As described above, the No Action Alternative would have long-term minor adverse impacts on cultural landscapes. When combined with cumulative projects, the No Action Alternative would result in long-term minor adverse cumulative impacts on cultural landscapes.

Conclusion

Under the No Action Alternative, the NPS would be expected to maintain and preserve the cultural landscape's contributing features. However, the NPS would not undertake any rehabilitations or change current management strategies or uses for these features. The No Action Alternative would have long-term minor adverse impacts due to slow deterioration caused by ongoing visitor use and weathering. The No Action Alternative would have long-term minor cumulative impacts to cultural landscapes.

IMPACTS OF ALTERNATIVE 4: INTERIOR VISITOR SERVICES

Under Alternative 4, the potentially-contributing restroom at Parking Area E would be removed. Structures identified as contributing to the cultural landscape would be retained, maintained, and interpreted, including Battery Mount Vernon, Battery Porter, Battery Robinson, Battery Sater, the Battery Commander's Station, the NCO Quarters, the Fort Hunt Overpass, the brick storage building and the wharf pilings. However, structures that have not yet been formally evaluated, but are potentially significant for Mission 66 program – the Area C and E restrooms – would be removed, resulting in an adverse effect if they are determined to be historically significant. An evaluation of NRHP eligibility of park resources potentially significant for their association with the Mission 66 program, including the picnic pavilion at Area A; the Area C and E restrooms and associated ornamental plantings; the loop road, parking areas and other elements of the circulation system; and the ballfields would be undertaken prior to implementation.

Changes to circulation include the removal of Parking Area E, a portion of Parking Area D, potentially a portion of Parking Area C and/or the Picnic Pavilion C in order to establish a Visitor Services Zone, and construction of an interpretive and recreation trail.

Construction activities would not directly alter the existing structures. Construction equipment would block views of contributing features as improvements are made. However, the primary areas of construction would not be near the contributing features of Fort Hunt Park cultural landscape. Such changes would be temporary in nature. As a result, Alternative 4 could result in short-term minor impacts on Fort Hunt cultural landscape.

The removal of Parking Area E, a portion of Parking Area D, and potentially a portion of Parking Area C would not have an adverse effect on features currently identified as contributing to the cultural landscape; in addition, this change would reinforce the character-defining grassy open spaces. However, the parking areas

are potentially significant for their association with the Mission 66 program, although they have not yet been formally evaluated.

The addition of the Visitor Services Zone would result in an adverse impact to the cultural landscape by adding non-contributing features at Parking Area C that have the potential to be visible from elsewhere in the park landscape. The modification of the loop road and parking area could result in an adverse effect to resources that are associated with Mission 66, although, as with other Mission 66 designed elements of the park landscape, these have not yet been formally evaluated.

The contributing historic road beds would be reused as part of the new interpretive and recreation trail route, which would have both beneficial impacts – the reuse of the circulation features – and potential for adverse impacts due to the physical changes necessary to construct a trail on the alignments. The interpretive trail would change the character of the road traces through new surfacing, signage, and potential wear and tear from the expected higher level of visitor use. The Alternative 4 proposed action does not involve changes to contributing circulation features including the Fort Hunt access road, the George Washington Memorial Parkway, the service road through picnic Area A, the remnant loop road north of the CCC pond, CCC trails in Area E and the wooded area at the south of the park.

Under Alternative 4, contributing land use activities identified by the CLI, including picnicking and other types of recreation, would continue to occur.

Alternative 4 would modify some vegetation that would enhance and be compatible with the landscape's historic character. Removal and re-vegetation of Parking Lots D, E, and Ballfield D (through re-vegetation) would remove associated features from the landscape. However, the revegetation of parking areas and the ballfield would substantially modify Mission 66-associated landscape features that have not yet been formally evaluated, but may be considered contributing. Addition of a trail that reuses existing historic roadbeds would be undertaken in a way that would preserve associated allées and lines of trees. Alternative 4 preserves other contributing vegetation, including the older trees, open grass fields, historic commemorative pin oak, native trees along the historic pasture line in the center of the park, and woodland areas around the park perimeter and to the south.

Under Alternative 4, no changes to contributing small-scale features are anticipated. The proposed actions would not affect the obelisk-shaped granite boundary marker at Fort Hunt Road, the nearby wood marker, or five stone fireplaces constructed by the CCC in the southern wooded area.

Actions affecting views and vistas proposed under Alternative 4 include creating an open viewshed that would focus on clearing exotic invasive vines and limited tree removal or pruning from Battery Robinson to the Potomac River. This would reestablish an important historic view currently blocked by vegetation, which would enhance the integrity of a contributing feature of the cultural landscape. The addition of the Visitor Services Zone has the potential to remove potentially-contributing features and add visible non-contributing, non-compatible features within internal park viewsheds; therefore long-term impacts on cultural landscapes would be beneficial and could be moderate and adverse.

Cumulative Impacts

The cumulative projects for Alternative 4 would be the same as those described in the No Action Alternative. As described above, Alternative 4 would have long-term beneficial and moderate adverse impacts on cultural landscapes. Therefore, Alternative 4 would result in long-term beneficial and moderate adverse cumulative impacts on cultural landscapes.

Conclusion

Under Alternative 4, impacts to the cultural landscape would be both beneficial and moderate adverse in nature. Non-contributing features could be removed, potentially resulting in beneficial impacts to the cultural landscape of Fort Hunt Park. Alternative 4 could result in adverse impacts due to the removal of several Mission 66-era buildings that have not yet been formally evaluated for National Register eligibility. The creation of open views where historic views have been overgrown would be beneficial. The addition of new facilities in the Visitor Services Zone would not directly affect contributing cultural landscape features, but could have a minor adverse impact to views from within the park landscape from other contributing features. The addition of new trails on old road beds could result in physical changes to the contributing road beds that would destroy historic materials and alter their character, resulting in a minor adverse impact. However, the reuse of the roadbeds would also reintroduce them as part of the park's active circulation system, which would be a beneficial impact. The actions proposed by the NPS as part of Alternative 4 would have a long-term beneficial and moderate adverse impact on the cultural landscape of Fort Hunt Park. As a result, Alternative 4 would have long-term beneficial and could have moderate adverse cumulative impacts on cultural landscapes.

IMPACTS OF ALTERNATIVE 5: GATEWAY VISITOR SERVICES (PREFERRED ALTERNATIVE)

Alternative Concept 5 places a Visitor Services Zone inside the rehabilitated NCO Quarters building and/or Pavilion A, and expands a small parking area and access path near the NCO Quarters to serve this new use. Alternative 5 also includes similar elements to Alternative 4, including removal of Parking Area E, a portion of Parking Area D, and associated restroom; removal and re-vegetation of Ballfield D; creation of a viewshed from Battery Robinson to the Potomac River; and construction of an interpretive/recreation trail. An evaluation of NRHP eligibility of park resources potentially significant for their association with the Mission 66 program, including the picnic pavilion at Area A; the Area C and E restrooms and associated ornamental plantings; the loop road, parking areas and other elements of the circulation system; and the ballfields would be undertaken prior to implementation.

Changes to circulation include the removal of Parking Area E, a portion of Parking Area D, addition of a small parking area associated with the rehabilitated NCO Headquarters, and construction of an interpretive and recreation trail.

Construction activities would directly alter the existing NCO Quarters during the adaptation of the building to a visitor use facility, however its adaptive re-use would be in keeping with the *Secretary of Interior's Standards*. Construction equipment would block views of built and landscape features as improvements are made, including the expansion of a small parking lot next to the NCO Quarters. Such changes would be

temporary in nature. As a result, Alternative 5 could result in short-term moderate impacts on Fort Hunt cultural landscape.

The removal of Parking Areas D and E would result in adverse impacts on the cultural landscape as described above under Alternative 4. The addition of the Visitor Services Zone and expansion of a small parking area at the NCO Headquarters could result in a minor adverse impact to the cultural landscape by adding non-contributing features adjacent to this contributing building, possibly diminishing the integrity of its setting. The contributing historic road beds would be reused as part of the new interpretive and recreation trail route, which would have both beneficial impacts and potential for adverse impact, as described above in Alternative 4. The proposed action does not involve changes to other known contributing circulation features.

Some landscape features that are not currently documented as contributing, but may potentially be contributing for their association with the Mission 66 program, would be adversely affected. These include the parking areas, loop road, Area E restroom, ballfield, and the setting of the picnic pavilion at Area A. However, these resources have not yet been formally evaluated for significance associated with the Mission 66 context.

As under Alternative 4, contributing land use activities identified by the CLI, including picnicking and other types of recreation, would continue to occur as part of Alternative 5.

Alternative 5 includes some modifications to vegetation that would enhance and be compatible with the landscape's historic character, as noted in Alternative 4 above.

Under Alternative 5, no changes to contributing small-scale features are anticipated.

Actions affecting views and vistas proposed under Alternative 5 include creating an open viewshed from Battery Robinson to the Potomac River, which would result in beneficial impacts described in Alternative 4. The addition of the Visitor Services Zone and parking at the NCO Quarters has the potential to add visible non-contributing, non-compatible features around a contributing structure, resulting in the potential for minor adverse impacts to contributing views.

Cumulative Impacts

The cumulative projects for Alternative 5 would be the same as those described in the No Action Alternative. As described above, Alternative 5 would have long-term beneficial and minor adverse impacts on cultural landscapes. Therefore, Alternative 5 would result in long-term minor adverse cumulative impacts on cultural landscapes.

Conclusion

Under Alternative 5, impacts to the cultural landscape would be both beneficial and moderate adverse in nature. The removal of potentially-contributing landscape features such as parking areas, ballfield features, and picnic pavilions could result in moderate adverse impacts on the cultural landscape of Fort Hunt Park. The creation of open views where historic views have been overgrown, and the removal of non-contributing features from internal park viewsheds, would be beneficial. The expansion of the existing parking area and a Visitor Services Zone at the NOC Quarters could alter views from within the park landscape, as well as to the

historic building's character within the landscape. As in Alternative 4, the addition of new trails on old road beds could result in a minor adverse impact as well as a beneficial impact from reuse. The actions proposed by the NPS under Alternative 5 would have a long-term beneficial and minor adverse impact on the cultural landscape of Fort Hunt Park. Alternative 5 would result in long-term beneficial and minor adverse cumulative impacts on cultural landscapes.

ARCHEOLOGICAL RESOURCES

Methodology and Assumptions

The NPS defines their archeological resources as "any material remains of human life or activities which are at least 100 years of age, and which are of archeological interest" (43CFR 7.3(a)). To be of archeological interest any remains of human life or activities must be capable of providing "scientific or humanistic understandings of past human behavior, cultural adaptation" (*ibid.*). The capability of providing that understanding is established by professional archeologists through the application of scientific methods of excavation and the analysis of material remains of past life or past activities.

43CFR7, issued in 1990, act as the implementing regulations to the Archaeological Resources Protection Act of 1979 (ARPA), which is designed to protect archeological resources on public lands for the present and future benefit of the American people (16 U.S.C. 470aaa-470mmm; Public Law 96-95 and amendments). The Environmental Assessment for the Fort Hunt Park SDP utilizes the definition of archeological resources under 43CFR7.3a and is designed to ensure that any resources within the APE that meet that definition and are, or may be, defined as significant under Criterion D of NHPA are granted protection, as required under ARPA.

Study Area

For the Environmental Assessment, the Study Area will be the equivalent of the APE, which has been defined as the boundary of Fort Hunt Park. The impact analysis conducted for this Environmental Assessment has considered all archeological resources documented within the APE as well as the potential for undocumented archeological sites that may also be present in the APE.

Impact Thresholds

Impacts to archeological sites occur when proposed alternatives result in complete or partial destruction of the resource, and are equivalent to a loss of integrity as defined in Section 106 of NHPA. In determining the appropriate impact threshold, both the extent to which the proposed alternative results in a loss of integrity and the degree to which losses can be compensated by mitigating activities, including preservation or data recovery, are considered. Only those resources considered significant for listing in the NRHP are protected by federal regulations. Resources are eligible for listing in the NRHP if they meet one or more eligibility criteria (for archeological sites, generally Criterion D, having the potential to provide information important to history or prehistory) and if they possess integrity.

For the analysis of impacts to archeological resources, the determination of the intensity of an impact is based on the foreseeable loss of integrity to known or potential resources. The analysis considers only the direct impacts of construction-related activities as the facility should have no ground-disturbing activities and no additional effects upon archeological resources under any of the alternatives under consideration upon

completion of construction. However, all impacts are considered long term, in that the impact to an archeological resource would last past the period of construction. The definition of impact thresholds used in this analysis are:

Negligible: The lowest level of detection that would have neither adverse nor beneficial impacts.

Minor: Disturbance of archeological resources would result in little, if any, loss of site integrity.

Moderate: Site disturbance would result in a loss of integrity and a partial loss of the character-defining features and information potential that form the basis of the site's NRHP eligibility. Mitigation is accomplished by a combination of archeological data recovery and in-place preservation.

Major: The disturbances result in a loss of site integrity to the extent that the resource is no longer eligible for listing in the NRHP. The site's character-defining features and information potential are lost to the extent that archeological data recovery is the primary form of mitigation.

Beneficial: Beneficial impacts can occur when an archeological site is stabilized in its current condition to maintain its existing level of integrity or when an archeological site is preserved in accordance with the *Secretary of Interior's Standards for the Treatment of Historic Properties* (NPS 1992).

Duration: Short-term impacts last for the duration of construction-related activities while long-term impacts last beyond the proposed construction activities and are permanent. All impacts to archeological sites are considered long-term impacts.

IMPACTS OF ALTERNATIVE 1: NO ACTION

Under the No Action Alternative, no new facilities would be constructed. No changes to road structure throughout the park would occur. Current maintenance and operation procedures and facilities would remain unchanged. Current drainage patterns would continue, and soil compaction would occur in the recreational areas, which could result in minor soil erosion and compaction on the site. Soil compaction prevents water from infiltrating soils, resulting in increased runoff and erosion. Because no new construction would occur, no new earth disturbances would occur, but compaction and erosion issues have minor impacts to soils, the No Action Alternative would result in long-term minor adverse impacts on archeological resources.

Cumulative Impacts

Other past, present, and reasonably foreseeable future actions have or could have adverse cumulative impacts to archeological resources of Fort Hunt Park. Dyke Marsh Wetland Restoration would have beneficial impacts on archeological resources within the GWMP by marsh stabilization and reduced erosion. The GWMP North Section Rehabilitation could have an overall adverse impact on archeological resources through ground-disturbing activities, such as changes to the roadway, drainage, and shoulder improvements. Site access improvements at George Washington's Mount Vernon could potentially have adverse impacts on archaeological resources through ground-disturbing activities, such as parking improvements. The Potomac Yard Metrorail Station project could have an adverse effect on archeological resources due to the excavation required near the GWMP. The Fort Belvoir Real Property Master Plan would result in adverse impacts on archeological resources due to construction projects. Implementation of the Fairfax County Comprehensive Plan could have adverse impacts due to new development and redevelopment and the associated ground

disturbance in the Fort Hunt Sector of the county. As described above, the No Action Alternative would have long-term minor adverse impacts on archeological resources. When combined with cumulative projects, the No Action Alternative would result in long-term minor adverse cumulative impacts on archeological resources.

Conclusion

The No Action Alternative would not construct new facilities within Fort Hunt Park. As a result, implementation of the No Action Alternative would result in long-term minor adverse impacts to archeological deposits in the APE due to minor soil erosion and compaction on the site. The No Action Alternative would result in long-term minor adverse cumulative impacts on archeological resources.

IMPACTS OF ALTERNATIVE 4: INTERIOR VISITOR SERVICES

Under Alternative 4, Parking Area E and its associated restroom would be removed, as would a portion of Parking Area D. A portion of Parking Area C and potentially Picnic Pavilion C would be replaced with visitor services features. Alternative 4 also includes the construction of an interpretive and recreation trail, as well as the restoration of viewsheds from Battery Robinson to the Potomac River.

The areas for removal of Parking Area E and its restroom, as well as a portion of Parking Area D and the Ballfield D (through re-vegetation) are situated in areas of Fort Hunt formerly occupied by POW enclosures used during the Second World War. The archeological potential of any remains in the APE resulting from the use of Fort Hunt as an internment camp has not been fully documented. An archeological survey would be undertaken by NPS to determine the location of archeological deposits or features and, if present, define the appropriate avoidance or mitigation measures to be taken.

Under Alternative Concept 4, the proposed Visitor Services Zone would be located at the existing Parking Area C. Locating the visitor facility at Parking Area C removes its visibility from contributing elements to the Fort Hunt Historic District (the NCO Quarters, CCC-era Oil Storage House; Battery Commander's Station, the batteries, Fort Hunt Overpass, and wharf pilings). No archeological sites are reported at this location and no undocumented archeological resources are suspected to be present at this location.

Construction of a new trail for interpretation and recreation across much of the northern half of the Park would have the potential to affect undocumented archeological deposits. Segments of the proposed alignment in the vicinity of the NCO Quarters, CCC-era Oil Storage House, and the Battery Commander's Station should be considered particularly sensitive for potentially significant archeological remains. Additional sections of the proposed pathway may also be sensitive for archeological deposits or features associated with other aspects of the Park's history for which there are no longer extant surface features (for example, the Bonus Army Camp or the CCC camp). Although impacts to the ground surface for the proposed trail could be relatively surficial, archeological deposits associated with any of these historic events or activities could be located very near the current ground surface. NPS would conduct an archeological survey to determine the presence or absence of archeological deposits in the footprint of disturbance for the proposed vegetation clearing. If eligible archeological resources are present, NPS would define the appropriate avoidance or mitigation measures to be taken.

Re-establishing an open viewshed from Battery Robinson to the Potomac River would likely use heavy equipment and machinery to remove vegetation. This construction has the potential to adversely affect archeological resources. No archeological sites are documented in the area between Battery Robinson and the river, but the riparian edge of the river is a particularly sensitive area for prehistoric archeological sites. Numerous, significant sites have been documented in this setting within and just beyond Fort Hunt. NPS would conduct an archeological survey to determine the presence or absence of archeological deposits in the footprint of disturbance for the proposed vegetation clearing. If eligible archeological resources are present, NPS would define the appropriate avoidance or mitigation measures to be taken.

Not only does Fort Hunt contain significant prehistoric archeological resources, the property has been host to a number of historic activities. Little is known about what archeological resources are present at Fort Hunt that may shed light on these significant aspects of our nation's history and prehistory.

No recorded archeological sites are located within the limits of disturbance for the various activities proposed under Alternative 4 and long-term impacts to those resources would be negligible. If archeological resources are present in the limits of disturbance, they remain unrecognized and potentially subject to destruction. In compliance with NEPA and NHPA, the NPS would undertake the necessary technical studies to identify any currently undocumented archeological resources within the footprint of disturbance under Alternative 4 and assess their eligibility for inclusion on the NRHP. If NRHP-eligible archeological resources are present, the NPS will take the necessary measures to avoid or mitigate adverse impacts to those resources. The net effect would be a long-term minor to moderate impacts for currently undocumented archeological resources in the Study Area.

Cumulative Impacts

The cumulative projects for Alternative 4 would be the same as those described in the No Action Alternative. As described above, the Alternative 4 could have long-term moderate adverse impacts on archeological resources. When combined with cumulative projects, Alternative 4 could result in long-term moderate adverse cumulative impacts on archeological resources.

Conclusion

The removal of structures such as parking areas, roadway, Ballfield D, and potentially a portion of Picnic Pavilion C could disturb undocumented archeological features at Fort Hunt Park. Additionally, construction of the proposed visitor facility and related infrastructure, such as an access road, water, sewer, and electricity, would be associated with an increased level of ground disturbance. Most areas of ground disturbance associated with Alternative 4 have not been surveyed for the presence of archeological resources, and additional survey is needed prior to construction. The measures proposed by NPS under Alternative 4 would have long-term moderate impacts on archeological resources at Fort Hunt. Therefore, Alternative 4 could result in long-term moderate adverse cumulative impacts on archeological resources.

IMPACTS OF ALTERNATIVE 5: GATEWAY VISITOR SERVICES (PREFERRED ALTERNATIVE)

Alternative 5 would establish a Visitor Services Zone in the NCO quarters building and/or Pavilion A, as well as expand a small parking area with an access path near the NCP quarters building. Like Alternative 4,

Alternative 5 would also remove Parking Area E and its associated restroom, as well as a portion of Parking Area D; and would construct an interpretive and recreation trail and restore viewsheds from Battery Robinson to the Potomac River.

Removal of Parking Area E and its restroom, as well as a portion of Parking Area D and Ballfield D (through re-vegetation) would be situated in areas of Fort Hunt formerly occupied by POW enclosures used during the Second World War. The archeological potential of any remains in the APE resulting from the use of Fort Hunt as an internment camp has not been fully documented. An archeological survey would be undertaking by the NPS to determine the location of archeological deposits or features and, if present, define the appropriate avoidance or mitigation measures to be taken.

Under Alternative 5, the proposed Visitor Services Zone would be located in the existing NCO Quarters and/or Pavilion A, and would be accompanied by an expanded parking area and path to the NCO Quarters building. No archeological sites are recorded in this area, but it should be considered highly sensitive to historic archeological resources associated with Fort Hunt. The NPS would conduct an archeological survey to determine the presence or absence of archeological deposits in the footprint of disturbance for the proposed vegetation clearing. If significant archeological resources are present, the NPS would define the appropriate avoidance or mitigation measures to be taken.

Construction of a new trail for interpretation and recreation across much of the northern half of the Park also has the potential to affect undocumented archeological deposits. Segments of the proposed alignment in the vicinity of the NCO Quarters, CCC-era Oil Storage House, and the Battery Commander's Station should be considered particularly sensitive for potentially significant archeological remains. Additional sections of the proposed pathway may also be sensitive for archeological deposits or features associated with other aspects of the Park's history for which there are no longer extent surface features (for example, the Bonus Army Camp or the CCC camp). Although impacts on the ground surface for the proposed trail may be relatively surficial, archeological deposits associated with any of these historic events or activities may be located very near the current ground surface. The NPS would conduct an archeological survey to determine the presence or absence of archeological deposits in the footprint of disturbance for the proposed vegetation clearing. If eligible archeological resources are present, the NPS would define the appropriate avoidance or mitigation measures to be taken.

Re-establishing an open viewshed from Battery Robinson to the Potomac River would likely use heavy equipment and machinery to remove vegetation and therefore would have the potential to adversely affect archeological resources. No archeological sites are documented in the area between Battery Robinson and the river, but the riparian edge of the river is a particularly sensitive area for prehistoric archeological sites. Numerous sites have been documented in this setting within and just beyond Fort Hunt. The NPS would conduct an archeological survey to determine the presence or absence of archeological deposits in the footprint of disturbance for the proposed vegetation clearing. If eligible archeological resources are present, NPS would define the appropriate avoidance or mitigation measures to be taken.

Not only does Fort Hunt contain significant prehistoric archeological resources, the property has been host to a number of significant historic activities. Little is known about what archeological resources are present at Fort Hunt that may shed light on these significant aspects of our nation's history and prehistory.

No recorded archeological sites are located within the limits of disturbance for the various activities proposed under Alternative 5. If archeological resources are present in the limits of disturbance, they remain unrecognized and potentially subject to destruction. In compliance with NEPA and NHPA, the NPS would undertake the necessary technical studies to identify any currently undocumented archeological resources within the footprint of disturbance under Alternative 5 and assess their eligibility for inclusion on the NRHP. Prior to construction, the NPS would conduct an archeological survey to identify and evaluate for listing in the NRHP archeological resources within the construction limit of disturbance. If NRHP-eligible archeological resources are present, the NPS will take the necessary measures to avoid or mitigate adverse impacts to those resources. The resources, if present, would be identified and recorded and measures will be taken, as required, to mitigate any adverse impacts to those resources. Protective measure may also be taken by NPS to assure the future preservation of archeological resources whose existence is currently unknown. Therefore, Alternative 5 would result in long-term moderate adverse impacts on undocumented archeological resources in the APE.

Cumulative Impacts

The cumulative projects for Alternative 5 would be the same as those described in the No Action Alternative. As described above, the Alternative 5 could have long-term moderate adverse impacts on archeological resources. When combined with cumulative projects, Alternative 5 could result in long-term moderate adverse cumulative impacts on archeological resources.

Conclusion

The removal of structures such as picnic pavilions, parking areas, roadway, and ballfields could result in moderate impacts to currently undocumented 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. Prior to construction, the NPS would conduct an archeological survey to identify and evaluate for listing in the NRHP archeological 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. As a result, Alternative 5 would have a long-term moderate adverse impacts on archeological resources at Fort Hunt. Alternative 5 could result in long-term moderate adverse cumulative impacts on archeological resources.

VISITOR USE AND EXPERIENCE

Methodology and Assumptions

NPS Management Policies (2006) state that the enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks, and that NPS is committed to providing appropriate high-quality opportunities for visitors to enjoy the parks. Fort Hunt Park provides a diversity of recreational opportunities and the potential for change in visitor experience was evaluated.

Study Area

The study area for visitor use and experience is within the Fort Hunt Park boundary.

Impact Thresholds

The thresholds of change for the intensity of impacts on visitor use and experience are defined as follows:

Negligible: Changes in visitor use and recreation resources would be barely perceptible. The visitor would not likely be aware of the effects associated with the action.

Minor: The visitor might be aware of the effects associated with the action, but would likely not express an opinion about it.

Moderate: Changes in visitor experience and recreation resources would be readily apparent. The visitor would be aware of the effects associated with the action and would likely express an opinion about the changes.

Major: Changes in visitor experience and recreation resources would be readily apparent and severely adverse. The visitor would be aware of the effects associated with the action and would likely express a strong opinion about the changes.

Duration: Short-term impacts would occur only during the treatment action or construction; long-term impacts would occur after the treatment action or construction.

IMPACTS OF ALTERNATIVE 1: NO ACTION

Under Alternative 1, the No Action Alternative, no changes would occur to visitor facilities or their operation within Fort Hunt Park, maintaining the existing visitor use and experience. The parking lots, pavilions, picnic areas, and ballfields would remain intact and available for permitted use. Visitors would continue to use the playground equipment and the existing restrooms, some of which are operated on a seasonal basis. The existing pedestrian- and bicycle-only loop trail in the southwest portion of the park would continue to be closed to vehicular traffic. The Park's main loop round would continue its existing alignment and circulation patterns for both vehicular and non-vehicular transportation. The existing programming at the site, such as the summer concert series, would continue.

The existing signs would continue to interpret features within the Park, covering a portion of the site's history; no additional signs or interpretation with comprehensive coverage of the Park's history would be provided. Overall, Alternative 1 would result in negligible long-term impacts on visitor use and experience.

Cumulative Impacts

Other past, present, and reasonably foreseeable future actions have or could have cumulative impacts on visitor use and experience. Planning activities at Jones Point Park could affect visitor use and experience within the southern portion of the GWMP. The Dyke Marsh Wetland Restoration and Long-term Management Plan would have beneficial impacts on visitor use and experience within the southern portion of the GWMP through expanded wetland habitats and interpretative opportunities. The GWMP North Section Rehabilitation would have a beneficial impact on visitor use and experience by improving safety and the visibility of GWMP. The Potomac Yard Metrorail Station project could potentially have an adverse effect on visitor use and experience due to the visibility of the project from the GWMP. The Fort Belvoir Master Plan effort anticipates approximately 17,000 new civilian and military personnel to be relocated to the

installation over the next 15 years. These new personnel would likely increase visitor use at the site and potentially increase demand for permitted facilities.

As described above, Alternative 1 would result in overall long-term negligible adverse impacts on visitor use and experience. When combined with the long-term beneficial and adverse impacts of the cumulative projects, Alternative 1 would result in long-term negligible adverse cumulative impacts on visitor use and experience.

Conclusion

Alternative 1 would not alter existing facilities or operations at the park, and park visitors would continue to use the park for active recreation, picnicking, and other recreation opportunities. The interpretation of the site would remain intact, and would therefore continue to provide inadequate learning experiences. Therefore, Alternative 1 would result in negligible adverse impacts on visitor use and experience. When combined with the long-term impacts of cumulative projects, Alternative 1 would result in long-term minor adverse cumulative impacts on visitor use and experience.

IMPACTS OF ALTERNATIVE 4: INTERIOR VISITOR SERVICES

Alternative 4 would establish a new visitor services zone near Picnic Area C in the western portion of Fort Hunt Park. Amenities in this zone could range from a wayside sign and support materials, an interactive kiosk, and/or a visitor services facility. A portion of the picnic area would be adapted for the visitor services facility, including the possible removal of Picnic Area C. Alternative 4 could also include the construction of new restroom facilities, replacing those located at Area E. Under Alternative 4, Ballfield D would be re-vegetated to create a multi-purpose open recreation space. Changes to circulation include the removal of Parking Area E, a portion of Parking Area D, replacement of a portion of Parking Area C with a Visitor Services Zone, the construction of an interpretive and recreation trail, the designation of some existing social trails into the trail network and the re-seeding of other social trails. A fitness circuit would be incorporated into the existing closed road. Upgraded playground equipment would be installed near Picnic Pavilion A. The existing programming at the site, such as the summer concert series, would continue.

The construction of visitor services facilities, the re-vegetation of Ballfield D, and the installation of playground equipment would interrupt use of these facilities during the construction. Other facilities within the park, such as other picnic areas and ballfields, would continue to operate under current conditions. Signage would be used to notify park visitors of temporary closures or changes in traffic patterns. Additionally, plans for construction equipment and materials staging areas would be developed to cause the least disruption to park visitors. Therefore, Alternative 4 would result in short-term minor adverse impacts on visitor use and experience.

Under Alternative 4, visitor interpretation would expand to include new facilities at Parking Area C and interpretive trails throughout the site. These interpretation facilities would offer opportunities to learn about the history of Fort Hunt Park. Additionally, the visitor services zone would serve as a clear location to help orient visitors and provide information about the services and recreation opportunities provided at the park.

Under Alternative 4, the re-vegetated Ballfield D would offer visitors flexible open space to accommodate a variety of sports, rather than the single baseball use. The fitness trail along the closed road loop would

provide opportunities for visitors to complete a fitness circuit, offering a new recreation opportunity at the park. The designation of some existing social trails would expand the trail network for park visitors and improve access to existing trails. New playground equipment would allow for a greater number of users and a wider variety of play experiences for youth. Although restrooms in Area E would be closed, potential new restrooms at Area C would offer new facilities and would meet accessibility standards. By offering new interpretation opportunities and new facilities, Alternative 4 would result in long-term beneficial impacts on visitor use and experience.

Visitors would continue to picnic at the site, although the potential removal of a portion of the picnic facilities in Area C, which could include the removal of Picnic Pavilion C, would reduce the capacity of events. Users of the park and its picnic areas would also experience a reduction and/or relocation of parking, making it more difficult to reach Picnic Areas C, D, and E. Therefore, Alternative 4 would result in moderate adverse impacts for those visitors using Picnic Area C.

Cumulative Impacts

The cumulative projects for Alternative 4 would be the same as those described in the No Action Alternative. As described above, Alternative 4 would result in overall short-term minor adverse impacts and long-term beneficial and moderate adverse impacts on visitor use and experience. When combined with the long-term beneficial and adverse impacts of the cumulative projects, Alternative 4 would result in short-term minor adverse and long-term beneficial and moderate adverse cumulative impacts on visitor use and experience.

Conclusion

Alternative 4 would provide new interpretive facilities, restrooms, playground equipment, and fitness circuit, as well as re-vegetate Ballfield D, remove or relocate parking, and reduce the size of picnic facilities in Area C. Overall, Alternative 4 would result in long-term beneficial impacts through increased interpretation and moderate adverse impacts due to the reduction in picnic areas and parking. Short-term minor adverse impacts would occur due to the reduction in facility availability during construction. Alternative 4 would result in short-term minor and long-term beneficial and moderate adverse cumulative impacts on visitor use and experience.

IMPACTS OF ALTERNATIVE 5: GATEWAY VISITOR SERVICES (PREFERRED ALTERNATIVE)

Alternative 5 would also establish a new visitor services center, although it would be located near the primary entrance to Fort Hunt Park. The new services, which could be interpretation, visitor orientation, and archives, would be located at the NCO quarters and/or the repurposed office space in Picnic Pavilion A. An expanded parking area near the NCO quarters, new access to the NCO quarters, and a new path to the repurposed office space would be constructed. Similar to Alternative 4, under Alternative 5, Ballfield D would be re-vegetated to create a multi-purpose open recreation space. Changes to circulation include the removal of Parking Area E, a portion of Parking Area D, and construction of an interpretive and recreation trail. A fitness circuit would be incorporated into the existing closed road. Upgraded playground equipment would be installed near Picnic Pavilion A. The existing programming at the site, such as the summer concert series, would continue.

The construction of visitor services facilities, the re-vegetation of Ballfield D, and the installation of playground equipment would interrupt use of these facilities during the construction. Other facilities within the park, such as other picnic areas and ballfields, would continue to operate under current conditions. Signage would be used to notify park visitors of temporary closures or changes in traffic patterns. Additionally, plans for construction equipment and materials staging areas would be developed to cause the least disruption to park visitors. Therefore, Alternative 5 would result in short-term minor adverse impacts on visitor use and experience.

Under Alternative 5, visitor interpretation would expand to include new facilities at the NCO quarters and Picnic Pavilion A and interpretive trails throughout the site. These interpretation facilities would offer visitors opportunities to learn about the history of Fort Hunt Park. Additionally, the visitor services zone would serve as a clear location at the entrance to the park to help orient visitors and provide information about the services and recreation opportunities provided at the park.

Like Alternative 4, Alternative 5 would offer visitors flexible open space at the re-vegetated Ballfield D and additional fitness opportunities along the closed road loop. The designation of some existing social trails would expand the trail network for park visitors and improve access to existing trails. New playground equipment would allow for a greater number of users and a wider variety of play experiences for youth. By offering new interpretation opportunities and new facilities, Alternative 5 would result in long-term beneficial impacts on visitor use and experience.

Visitors would continue to picnic at the site and no changes would be made to existing picnic facilities. Although additional parking could be located next to the NCO quarters, some people utilizing the visitor services functions at the NCO quarters and/or the repurposed office at Picnic Pavilion A would likely utilize Parking Area A. Visitors to Picnic Area A could experience an increased demand for existing parking, resulting in picnickers parking further away from the permitted pavilion. Therefore, Alternative 5 would result in minor adverse impacts for those visitors using Picnic Area A.

Cumulative Impacts

The cumulative projects for Alternative 5 would be the same as those described in the No Action Alternative. As described above, Alternative 5 would result in overall short-term minor adverse impacts and long-term beneficial and minor adverse impacts on visitor use and experience. When combined with the long-term beneficial and adverse impacts of the cumulative projects, Alternative 5 would result in short-term minor adverse and long-term beneficial and minor adverse cumulative impacts on visitor use and experience.

Conclusion

Alternative 5 would provide new interpretive facilities at the NCO quarters and/or the repurposed office space of Pavilion A, playground equipment, and fitness circuit, as well as re-vegetate Ballfield D, and remove or relocate parking. Overall, Alternative 5 would result in long-term beneficial impacts through increased interpretation and minor adverse impacts due to the reduction in picnic areas and parking. Short-term minor adverse impacts would occur due to the reduction in facility availability during construction. Alternative 5 would result in short-term minor and long-term beneficial and minor adverse cumulative impacts on visitor use and experience.

CHAPTER 5 : CONSULTATION AND COORDINATION

The NPS places a high priority on public involvement in the NEPA process and on giving the public an opportunity to comment on proposed actions. As part of the NPS NEPA process, issues associated with the proposed action were identified during the internal scoping meeting held with NPS and have been communicated to other affected agencies and stakeholders.

AGENCY CONSULTATION

Coordination with local and federal agencies and various interest groups was conducted during the NEPA process to identify issues and/or concerns related to the SDP at Fort Hunt Park. In accordance with Section 7 of the Endangered Species Act, consultation letters were sent from the NPS to the U.S. Fish and Wildlife Service (USFWS) and the Virginia Department of Conservation and Recreation (VDCR) (See Appendix A).

NPS notified the Advisory Council on Historic Preservation (ACHP), VDHR, and others of this undertaking during the scoping period and solicited comments on both NEPA and Section 106. The ACHP, VDHR, and Fairfax County Park Authority (FCPA) will all receive a copy of this EA for review and comment.

AGENCY SCOPING

Agency scoping for the Fort Hunt SDP EA began January 10, 2011 and concluded March 11, 2011. During this time, scoping letters were sent requesting information on potential issues or resources associated with the project. The agencies were also invited to attend the public scoping meeting.

In response to the comments received, GWMP revised the alternatives and presented the adjusted concepts in June 2012. The review period was open for 30 days, between June 13, 2012 and July 28, 2012. Further refinements to the alternatives concepts were presented in early 2015, with the comment period open between January 26, 2015 and March 4, 2015, with additional notifications made to agencies.

SECTION 7 CONSULTATION

Coordination with local and federal agencies and various interest groups was conducted during the NEPA process to identify issues and/or concerns related to the SDP at Fort Hunt Park. In accordance with Section 7 of the Endangered Species Act, consultation letters were initially sent from the NPS to the USFWS and the VDCR on December 13, 2010. An additional communication was sent from NPS to USFWS and the VDCR in March 2015 as part of the reinitiated alternative concept development and it was determined that no federally listed species occurred within the project area. However, in May 2015, the northern long-eared bat was listed as a threatened species, which prompted ongoing consultation which is being conducted as part of a comprehensive effort for multiple projects. VDCR responded to the initial 2011 EA efforts via a letter and stated that the project area is within the Mount Vernon Shoreline Conservation Site. This conservation site contains the natural heritage resource of concern, the Bald Eagle (*Haliaeetusleucocephalus*). This species is classified as Threatened by the Virginia VDGIF. VDCR recommends coordination with VDGIF to ensure compliance with protected species legislation. VDCR confirmed that the project would not impact any documented state-listed plants or insects or any State Natural Area Preserves.

SECTION 106 CONSULTATION

In accordance with the provisions at 36 CFR 800.8(c), NPS contacted parties with an interest in historic preservation, including the State Historic Preservation Office and local governments, and identified the Fairfax County Parks Authority and the Friends of Fort Hunt, Inc. as potentially interested consulting parties. Friends of Fort Hunt, Inc accepted status as a consulting party and GWMP did not receive a reply from the Fairfax County Parks Authority. In consultation with the State Historic Preservation Office and the Friends of Fort Hunt, Inc., the NPS was able to identify known historic properties listed in or eligible for inclusion in the National Register of Historic Places within the broadly defined area of potential effects for this SDP.

The SDP is part of the nondestructive project planning for these prospective undertakings, and as such does not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate [a specific] undertaking's adverse effects on historic properties in accordance with 36 CFR 800.1(c). Alternatives 4 and 5 include actions that result in the removal of structures that have not been fully evaluated for eligibility for listing in the NRHP. A separate Assessment of Effects has been completed and each Alternative has the potential to cause an adverse effect on historic properties. Additional coordination with consulting parties will be necessary. Further, the NPS commits in this document to complete the Section 106 review for each undertaking that may stem from the SDP in accordance with the Programmatic Agreement among the National Park Service, the ACHP, and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act (2008) and the ACHP's regulations. NPS will invite the Friends of Fort Hunt, Inc. as a consulting party on all undertakings stemming from this SDP, as well as any additional parties identified during the public review of this EA or subsequently.

VIRGINIA COASTAL ZONE MANAGEMENT PROGRAM

All federal actions within the Virginia Coastal Zone must be consistent with the Virginia Coastal Zone Management Program (VCP). The VCP is administered by several agencies; however, Virginia Department of Environmental Quality (VDEQ) is the lead agency which coordinates review of federal consistency determinations. The federal consistency regulations implement the CZMA requirement that federal actions (regardless of location) that have reasonably foreseeable effects on any land or water use or natural resource of the coastal zone (also referred to as coastal uses or resources, or coastal effects) must be consistent with the enforceable policies of a coastal state's federally approved coastal management program, before they can occur (VDEQ 2010c).

A CZMA Consistency Determination is required for all federal development projects taking place within a designated Coastal Zone. In Virginia, consistency for federal projects is reviewed by the VDEQ. The state designated coastal zone includes all of Fairfax County; therefore, Fort Hunt Park is entirely within the Coastal Zone. Appendix C provides the Fort Hunt Park Consistency Determination. As outlined in the Fort Hunt Park Consistency Determination, the No Action and Action Alternatives would have negligible direct, indirect, secondary or cumulative impacts on resources associated with the Coastal Zone. Correspondingly, the proposed actions would not require any Coastal Zone permits from the Virginia Marine Resource Commission (VMRC), the State Air Pollution Control Board, or other state agencies. All new construction is proposed in previously disturbed areas.

COMMENT PERIOD

To comment on this EA, you may mail comments or submit them online within 30 days of the publication of this EA. Please be aware that your comments and personal identifying information may be made publicly available at any time. While you may request that NPS withhold your personal information, we cannot guarantee that we will be able to do so. Please submit comments online at parkplanning.nps.gov/forthunt and follow the appropriate links. Comments may also be submitted via mail addressed to:

Claire Rozdilski, Acting Environmental Protection Specialist
George Washington Memorial Parkway
C/o Turkey Run Park
McLean, VA 22101

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GLOSSARY AND ACRONYMS

GLOSSARY OF TERMS

Affected Environment — The existing environment to be affected by a proposed action and alternatives.

Best Management Practices — Methods that have been determined to be the most effective, practical means of preventing or reducing pollution or other adverse environmental impacts.

Contributing Resource — A building, site, structure, or object that adds to the historic significance of a property or district.

Council on Environmental Quality — Established by Congress within the Executive Office of the President with passage of the *National Environmental Policy Act* of 1969. CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives.

Cultural Landscape – Environments that include natural and cultural resources associated with a historical context.

Cultural Resources — Prehistoric and historic districts, sites, buildings, objects, or any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or other reason.

Cumulative Impacts — Under NEPA regulations, the incremental environmental impact or effect of an action together with the effects of past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions (40 CFR Part 1508.7).

Endangered Species — Any species that is in danger of extinction throughout all or a significant portion of its range. The lead federal agency for the listing of a species as endangered is the U.S. Fish and Wildlife Service, and it is responsible for reviewing the status of the species on a five-year basis.

Endangered Species Act (16 U.S.C. 1531 et seq.) — An Act which provides a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved and which provides a program for the conservation of such endangered species and threatened species.

Environmental Assessment — An environmental analysis prepared pursuant to the *National Environmental Policy Act* to determine whether a federal action would significantly affect the environment and thus require a more detailed environmental impact statement (EIS).

Executive Order — Official proclamation issued by the President that may set forth policy or direction or establish specific duties in connection with the execution of federal laws and programs.

Floodplain — The flat or nearly flat land along a river or stream or in a tidal area that is covered by water during a flood.

Impairment— Within this document, the term impairment has two separate definitions. The NPS requires an analysis of potential effects to determine whether actions would impact or impair Park resources. NPS is

empowered with the management discretion to allow impacts on Park resources and values (when necessary and appropriate) to fulfill the purposes of a Park, as long as the impact does not constitute impairment of the affected resources and values. Impairment is also a classification of poor water quality for a surface water body under the U.S. Clean Water Act.

National Environmental Policy Act (NEPA) — The Act as amended, articulates the federal law that mandates protecting the quality of the human environment. It requires federal agencies to systematically assess the environmental impacts of their proposed activities, programs, and projects including the —no build alternative of not pursuing the proposed action. NEPA requires agencies to consider alternative ways of accomplishing their missions in ways which are less damaging to the environment.

National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.) — An Act to establish a program for the preservation of historic properties throughout the nation, and for other purposes, approved October 15, 1966 [Public Law 89-665; 80 STAT. 915; 16 U.S.C. 470 as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575].

National Register of Historic Places (NRHP) — A register of districts, sites, buildings, structures, and objects important in American history, architecture, archeology, and culture, maintained by the Secretary of the Interior under authority of Section 2(b) of the *Historic Sites Act* of 1935 and Section 101(a)(1) of the *National Historic Preservation Act* of 1966, as amended.

Scoping — Scoping, as part of NEPA, requires examining a proposed action and its possible effects; establishing the depth of environmental analysis needed; and determining analysis procedures, data needed, and task assignments. The public is encouraged to participate and submit comments on proposed projects during the scoping period.

Threatened Species — Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

ACRONYMS

ABA	Architectural Barriers Act
ABAAS	Architectural Barriers Act Accessibility Standard
ADA	Americans with Disabilities Act
ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effect
ARPA	Archeological Resources Protection Act
BMPs	Best Management Practices
CCC	Civilian Conservation Corps
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLI	Cultural Landscape Inventory
CRZ	critical root zone
CT	Census Tract
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
DM	Departmental Manual
DO	Director's Order
EA	Environmental Assessment
EDA	Economic Development Authority
EIS	Environmental Impact Statement
EO	Executive Order
EPA	Environmental Protection Agency
FCPA	Fairfax County Parks Authority
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
GWMP	George Washington Memorial Parkway
IPM	Integrated Pest Management
LEED	Leadership in Energy and Environmental Design
MBTA	Migratory Bird Treaty Act
MS4	Municipal Separate Storm Sewer System
NCO	Non-Commissioned Officer
NRCS	Natural Resource Conservation Service
NCR	National Capital Region
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
OCRM	Office of Ocean and Coastal Resource Management
PEPC	Planning, Environment and Public Comment
PL	Public Law
RPA	Resource Protection Area
SDP	Site Development Plan
SHPO	State Historic Preservation Office
SSI	Sustainable Sites Initiative
USDA	United States Department of Agriculture
USFWS	United Stated Fish and Wildlife Service
VCOI	Virginia Council on Indians
VCP	Virginia Coastal Zone Management Program
VDCR	Virginia Department of Conservation and Recreation
VDEQ	Virginia Department of Environmental Quality
VDGIF	Virginia Department of Game and Inland Fisheries
VDHR	Virginia Department of Historical Resources
VMRC	Virginia Marine Resources Commission
VSMP	Virginia Stormwater Management Program
VWP	Virginia Water Protection

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Appendix A

Agency
Consultation

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Virginia Ecological Services Field Office
6669 SHORT LANE
GLOUCESTER, VA 23061
PHONE: (804)693-6694 FAX: (804)693-9032
URL: www.fws.gov/northeast/virginiafield/

Consultation Code: 05E2VA00-2015-SLI-1965 May 13, 2015
Event Code: 05E2VA00-2015-E-01972
Project Name: Fort Hunt

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. 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

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (http://www.fws.gov/windenergy/) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm; http://www.towerkill.com; and http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment

United States Department of Interior
Fish and Wildlife Service

Project name: Fort Hunt

Official Species List

Provided by:

Virginia Ecological Services Field Office
6669 SHORT LANE
GLOUCESTER, VA 23061
(804) 693-6694
http://www.fws.gov/northeast/virginiafield/

Expect additional Species list documents from the following office(s):

Chesapeake Bay Ecological Services Field Office
177 ADMIRAL COCHRANE DRIVE
ANNAPOLIS, MD 21401
(410) 573-4599

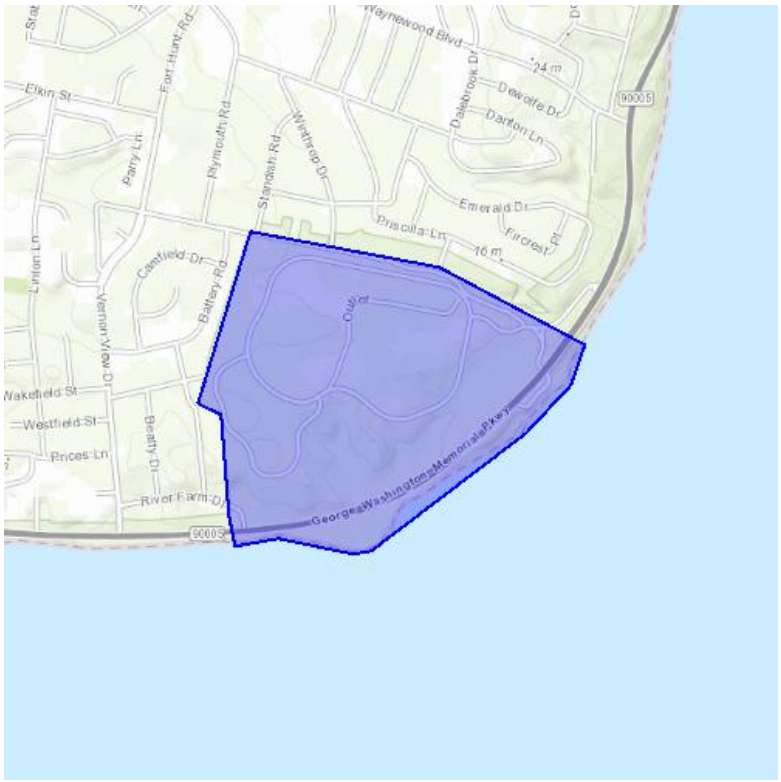
Consultation Code: 05E2VA00-2015-SLI-1965
Event Code: 05E2VA00-2015-E-01972

Project Type: DEVELOPMENT

Project Name: Fort Hunt
Project Description: Multiple projects to enhance visitor use, service and experience.

Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-77.05749928951263 38.718750015233915, -77.05067574977875 38.71774549846859, -77.04544007778168 38.71555225446743, -77.04595506191254 38.714430492973015, -77.04756438732147 38.713057566887876, -77.05314338207245 38.709775831843274, -77.05378711223601 38.709692112141944, -77.05651223659515 38.7100939658142, -77.05805718898772 38.70990978316147, -77.0582503080368 38.71076371691501, -77.05857217311859 38.71359334605844, -77.05940902233124 38.7139114630409, -77.05749928951263 38.718750015233915)))

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

United States Department of Interior
Fish and Wildlife Service

Project name: Fort Hunt

Endangered Species Act Species List

There are a total of 1 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Mammals	**Status**	**Has Critical Habitat**	**Condition(s)**
Northern long-eared Bat *(Myotis septentrionalis)*	Threatened		

Critical habitats that lie within your project area

There are no critical habitats within your project area.

COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

March 8, 2015

Alexcy Romero, Superintendent
National Park Service
George Washington Memorial Parkway
Turkey Run Park
McLean, Virginia 22101

Re: Revised Alternative Concepts
Fort Hunt Park Development Plan
Fairfax County, Virginia
DHR File No. 2011-0141

Dear Mr. Romero:

Thank you for offering us the opportunity to comment on the new alternative concepts for the development plan at Fort Hunt Park. We understand that the new alternative concepts being presented for review reflect public and agency comment received from three rounds of review; public scoping in early 2011, feedback on the Environmental Assessment in late 2011, as well as renewed public scoping in mid-2012. As you know, we have earlier agreed with your approach to development of the plan and have concurred that the National Park Service' planning process here will not restrict the subsequent consideration of alternatives to avoid, minimize or mitigate any future undertaking's adverse effects on historic properties. At this time we would like to encourage further consideration of Alternative Concept 5 – because it proposes a visitor services zone that could include the historic NCO quarters. Our view is that use and interpretation of that building will likely serve as a greater incentive for its preservation that creating a new visitors center in area C (which in any case will require archaeological survey before final plans are developed. We have no further comments at this time.

If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me at (804)482-6088; fax (804) 367-2391; e-mail ethel.eaton@dhr.virginia.gov.

Sincerely,

Ethel R. Eaton, Ph.D., Senior Policy Analyst
Division of Resource Services and Review

c. Matthew Virta, Cultural Resource Manager

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:
1.A.2 (GWMP)

January 16, 2015

Dr. Dorothy Canter
Friends of Fort Hunt Park, Inc.
19 Maplewood Park Court
Bethesda, MD 20814

Dear Dr. Canter:

The National Park Service (NPS) is preparing new alternative concepts for the Fort Hunt Park Site Development Plan Environmental Assessment/Assessment of Effects (SDP EA/AOE). Renewed public scoping for the alternative concepts is open for public and agency review through February 18, 2015.

This project was initiated in late 2010, with Section 106 consultation and public scoping conducted in early 2011 and an EA/AOE released for review in September 2011. Based on the issues highlighted through the public review, GWMP determined that none of the alternatives presented in the 2011 EA/AOE would move forward as originally proposed. The decision was made to complete a new EA/AOE that would look at additional alternatives, with further analysis and a reinitiated public scoping. Revised alternative concepts were developed to reflect public comment received during the September 2011 EA/AOE review and were released for public review in June 2012. After careful analysis of public comment and additional investigations of potential resource impacts, revisions were made to the alternative concepts presented in June 2012. The new alternative concepts being presented for review through February 18, 2015 respond to public feedback on concepts presented in 2012, as well as additional NPS analysis conducted since that time.

In accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and implementing regulations (36 CFR Part 800), federal agencies are required to consider the effect of their actions on historic properties listed or eligible for listing in the National Register of Historic Places. The NPS has initiated consultation under Section 106 with the Advisory Council on Historic Preservation (ACHP) and the Virginia Department of Historic Resources. The NPS is also currently conducting an analysis of the proposed project through an Environmental Assessment process as required by the National Environmental Policy Act (NEPA).

A joint Public Scoping/Section 106 consultation Open House is planned on Thursday, February 5, 2015 from 6:00p.m. to 8:30p.m. at Mary Washington Library at 6614 Fort Hunt Road, Alexandria, VA. We welcome your attendance and comments on the new alternatives. Information will be posted electronically on the National Park Service's web-based program "Planning, Environment, and Public Comment (PEPC)." The project web address is http://parkplanning.nps.gov/forthunt.

The NPS has identified your organization as a possible consulting party. If you desire to participate as a consulting party for the Section 106 review of the proposed rehabilitation, please reply in writing via letter or e-mail, no later than February 1, 2015, to my attention at gwmp_superintendent@nps.gov or to the address above. In your letter or e-mail, please provide complete contact information and identify whether you will be consulting on behalf of an individual or as a representative of an organization.

For further explanation of consulting parties, and their role in the process, please reference the ACHP's *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available at http://www.achp.gov/citizensguide.pdf .

If you have any questions concerning the proposed project or the role of consulting parties, please contact Mr. Matthew Virta, Cultural Resources Program Manager for the GWMP, at 703-289-2535 or matthew_virta@nps.gov

Sincerely,

Alexcy Romero
Superintendent

cc: Dr. Ethel Eaton, Office of Review and Compliance, Virginia Department of Historic Resources

bcc:

GWMP-RM M. Virta, Cultural Resources Program Manager
GWMP-RM S. Monteleone, Chief of Resource Management

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:
1.A.2 (GWMP)

January 16, 2015

Mr. Kirk W. Kincannon, Director
Fairfax County Park Authority
Herrity Building
12055 Government Center Parkway
Suite 927
Fairfax, VA 22035

Dear Mr. Kincannon:

The National Park Service (NPS) is preparing new alternative concepts for the Fort Hunt Park Site Development Plan Environmental Assessment/Assessment of Effects (SDP EA/AOE). Renewed public scoping for the alternative concepts is open for public and agency review through February 18, 2015.

This project was initiated in late 2010, with Section 106 consultation and public scoping conducted in early 2011 and an EA/AOE released for review in September 2011. Based on the issues highlighted through the public review, GWMP determined that none of the alternatives presented in the 2011 EA/AOE would move forward as originally proposed. The decision was made to complete a new EA/AOE that would look at additional alternatives, with further analysis and a reinitiated public scoping. Revised alternative concepts were developed to reflect public comment received during the September 2011 EA/AOE review and were released for public review in June 2012. After careful analysis of public comment and additional investigations of potential resource impacts, revisions were made to the alternative concepts presented in June 2012. The new alternative concepts being presented for review through February 18, 2015 respond to public feedback on concepts presented in 2012, as well as additional NPS analysis conducted since that time.

In accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and implementing regulations (36 CFR Part 800), federal agencies are required to consider the effect of their actions on historic properties listed or eligible for listing in the National Register of Historic Places. The NPS has initiated consultation under Section 106 with the Advisory Council on Historic Preservation (ACHP) and the Virginia Department of Historic Resources. The NPS is also currently conducting an analysis of the proposed project through an

Environmental Assessment process as required by the National Environmental Policy Act (NEPA).

A joint Public Scoping/Section 106 consultation Open House is planned on Thursday, February 5, 2015 from 6:00p.m. to 8:30p.m. at Mary Washington Library at 6614 Fort Hunt Road, Alexandria, VA. We welcome your attendance and comments on the new alternatives. Information will be posted electronically on the National Park Service's web-based program "Planning, Environment, and Public Comment (PEPC)." The project web address is http://parkplanning.nps.gov/forthunt.

The NPS has identified your organization as a possible consulting party. If you desire to participate as a consulting party for the Section 106 review of the proposed rehabilitation, please reply in writing via letter or e-mail, no later than February 1, 2015, to my attention at gwmp_superintendent@nps.gov or to the address above. In your letter or e-mail, please provide complete contact information and identify whether you will be consulting on behalf of an individual or as a representative of an organization.

For further explanation of consulting parties, and their role in the process, please reference the ACHP's *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available at http://www.achp.gov/citizensguide.pdf.

If you have any questions concerning the proposed project or the role of consulting parties, please contact Mr. Matthew Virta, Cultural Resources Program Manager for the GWMP, at 703-289-2535 or matthew_virta@nps.gov

Sincerely,

Alexcy Romero
Superintendent

cc: Dr. Ethel Eaton, Office of Review and Compliance, Virginia Department of Historic Resources

bcc:

GWMP-RM M. Virta, Cultural Resources Program Manager
GWMP-RM S. Monteleone, Chief of Resource Management

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:
1.A.2 (GWMP)

January 16, 2015

Dr. Ethel Eaton
Virginia Department of Historic Resources
Office of Review and Compliance
2801 Kensington Avenue
Richmond, VA 23221

RE: Re-initiation of Section 106 Consultation; and Public Scoping for New Alternative Concepts, Fort Hunt Park Site Development Plan Environmental Assessment/Assessment of Effects VDHR File # 2011-0141

Dear Dr. Eaton:

In accordance with the Council of Environmental Quality, the National Environmental Policy Act, and the National Historic Preservation Act, the George Washington Memorial Parkway (GWMP) is notifying you that three revised alternative concepts have been developed for the Fort Hunt Park Site Development Plan Environmental Assessment/Assessment of Effects (SDP EA/AOE). Renewed public scoping for the revised alternative concepts is open for public and agency review through February 18, 2015.

This project was initiated in late 2010, with Section 106 consultation and public scoping conducted in early 2011 and an EA/AOE released for review in September 2011. Based on the issues highlighted through the public review, GWMP determined that none of the alternatives presented in the 2011 EA/AOE would move forward as originally proposed. The decision was made to complete a new EA/AOE that would look at additional alternatives, with further analysis and a reinitiated public scoping. Revised alternative concepts were developed to reflect public comment received during the September 2011 EA/AOE review and were released for public review in June 2012. After careful analysis of public comment and additional investigations of potential resource impacts, revisions were made to the alternative concepts presented in June 2012. The new alternative concepts being presented for review through February 18, 2015 respond to public feedback on concepts presented in 2012, as well as additional NPS analysis conducted since that time. As a result of the length of time since the earlier initiation for this project, the NPS would like to formally re-establish Section 106 consultation with your office.

As communicated in correspondence dated December 10, 2010 that initiated Section 106 consultation with your office on the Fort Hunt Park SDP, NPS is coordinating our efforts under NEPA and Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, in accordance with 36 CFR Part 800.8(c): *Use of the NEPA process for Section 106 purposes*. NPS will use the EA/AOE to evaluate the potential effects to historic properties in accordance with strategies for a planning undertaking previously discussed with your office and acknowledged in your letter of October 5, 2011. The current EA/AOE will be distributed for public review and comment in the spring of 2015.

A joint Public Scoping/Section 106 consultation Open House is planned on Thursday, February 5, 2015 from 6:00p.m. to 8:30p.m. at Mary Washington Library at 6614 Fort Hunt Road, Alexandria, VA. We welcome your attendance and comments on the new alternatives. Information will be posted electronically on the National Park Service's web-based program "Planning, Environment, and Public Comment (PEPC)." The project web address is http://parkplanning.nps.gov/forthunt.

Comments can be submitted on PEPC or mailed to:

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

Please forward any comments on the revised alternative concepts by February 18, 2015. If you have any questions, please contact Matt Virta, Cultural Resources Program Manager for GWMP, at 703-289-2535 or at matthew_virta@nps.gov .

Thank you for your time in reviewing this project.

Sincerely,

Alexcy Romero
Superintendent

cc: Katry Harris, Advisory Council on Historic Preservation

bcc:

GWMP-RM M. Virta, Cultural Resources Program Manager
GWMP-RM S. Monteleone, Chief of Resource Management

D18

Preserving America's Heritage

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

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,

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

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

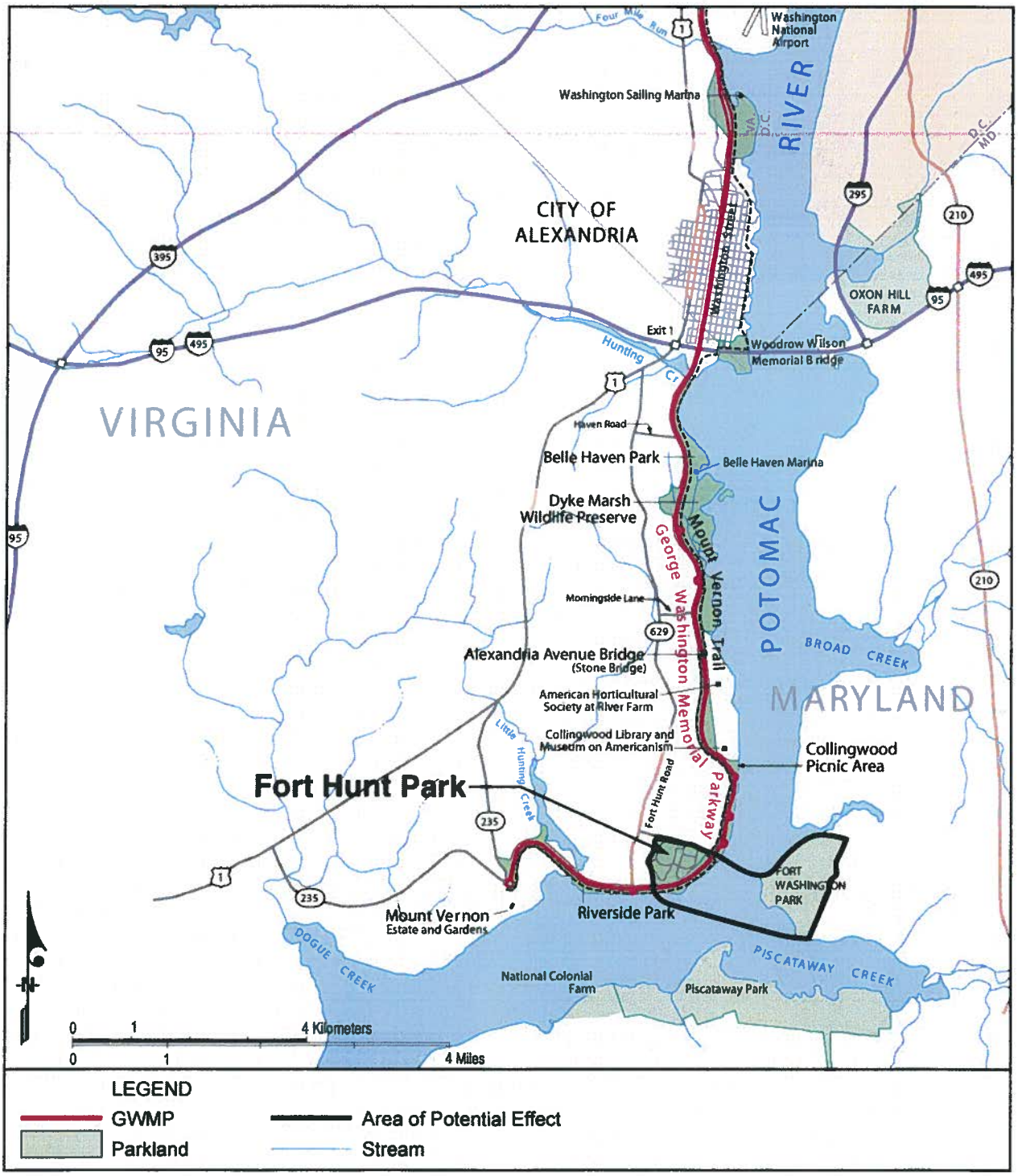


Figure 1. Project Location Map with Preliminary Area of Potential Effect

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

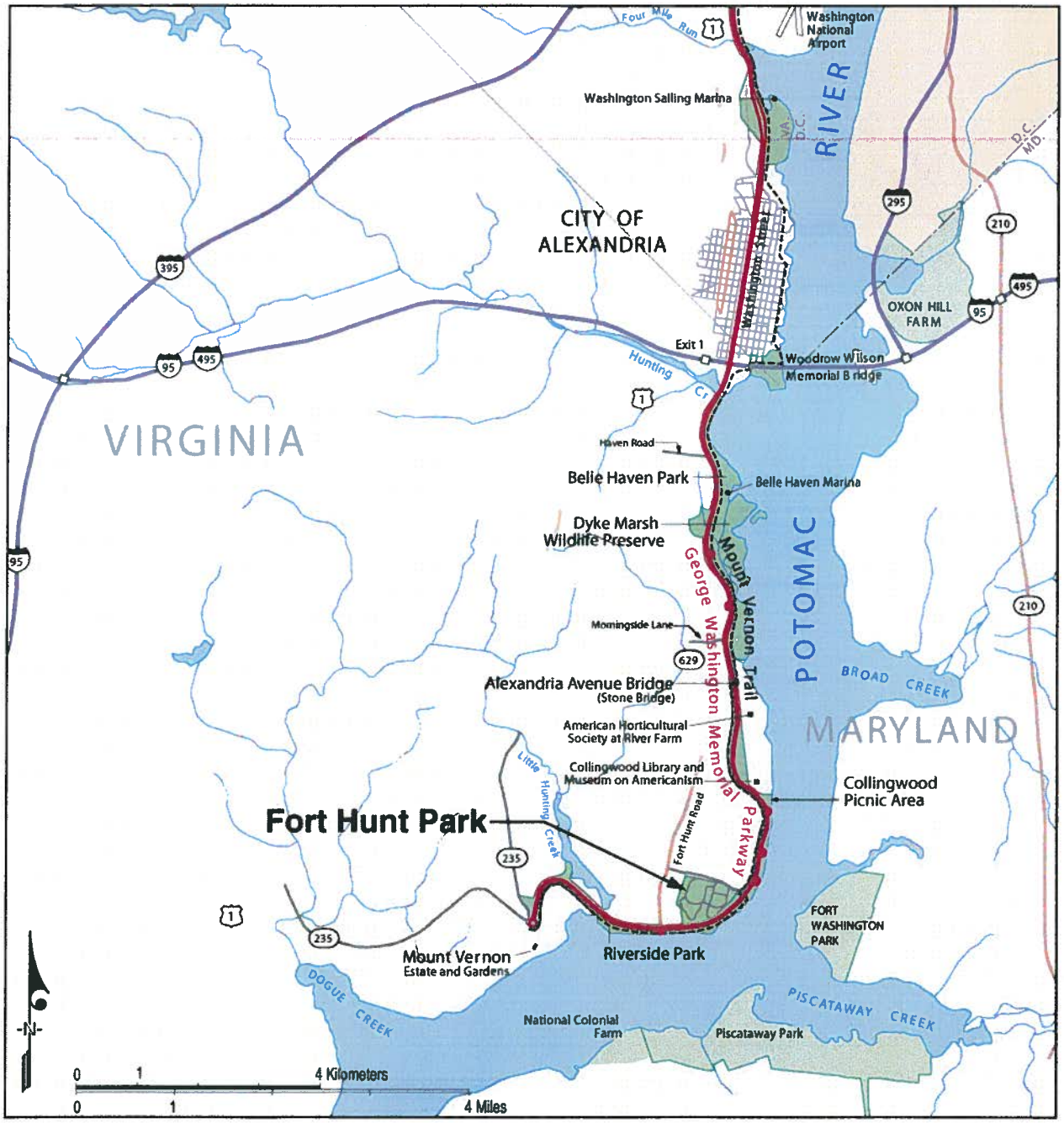


Figure 1. Project Location Map

Appendix B

Assessment of Effects

ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

A. DESCRIPTION OF UNDERTAKING

1. Park: George Washington Memorial Parkway

2. Project Description:

Project Name: Fort Hunt Park Site Development Plan EA
Prepared by: **Date Prepared:** **Telephone:**
PEPC Project Number: 33621
Locations:
Describe project:

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 remains of four Endicott-era batteries, the vacant shell of a fire control station, and an Non-Commissioned Officer's quarters constructed between 1901 and 1906, there is little to indicate that Fort Hunt's 157.4 acres has 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 has 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.

The goal of this project is to develop a Site Development Plan (SDP) and Environmental Assessment (EA) for Fort Hunt Park. The purpose of the SDP and EA 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 will be accomplished by balancing historic preservation with the planned upgrading or removal of current facilities and the construction of future facilities at Fort Hunt Park while maintaining the need for recreational, educational and research activities. This comprehensive planning effort will incorporate new historical and archeological resource data obtained by the park during the past five 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.

The SDP should exemplify the vision of the Park and guide all future planning, design and construction for the development of Fort Hunt Park. The plan should include the following elements: • physical site planning, the layout of facilities and infrastructure (minimum 3 alternatives) • design program utilizing the Facility Planning Model • sketches, renderings, elevations, and photo simulations that reflect the architectural and site character

as it would look at proposed sites • conceptual functional diagrams of facilities indicating the flow of operation/circulation and visitor use • LEED planning and design principles with current sustainable thinking • phasing plan and implementation schedule prioritized based on Park goals and funding possibilities • construction cost information for each developed alternative, including the preferred alternative • marketing brochure to effectively communicate the Park vision and need for the project to the stakeholders, which include congressional delegation, WASO (Washington Support Office), NCR (National Capital Region), potential investors or concessioners, active NGOs (Non-Government Organizations), and numerous other public and private sector partners that may be interested in advancing and funding this project.

Area of potential effects (as defined in 36 CFR 800.16[d])

3. Has the area of potential effects been surveyed to identify historic properties?

____ **No**

_X_ **Yes**

4. Potentially Affected Resource(s):

5. The proposed action will: (check as many as apply)

_X_ **Destroy, remove, or alter features/elements from a historic structure**

____ **Replace historic features/elements in kind**

_X_ **Add non-historic features/elements to a historic structure**

____ **Alter or remove features/elements of a historic setting or environment (inc. terrain)**

____ **Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape**

____ **Disturb, destroy, or make archeological resources inaccessible**

____ **Disturb, destroy, or make ethnographic resources inaccessible**

_X_ **Potentially affect presently unidentified cultural resources**

____ **Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources**

____ **Involve a real property transaction (exchange, sale, or lease of land or structures)**

____ **Other (please specify):** _____

6. Supporting Study Data:
(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

Fort Hunt Park Site Development Plan Environmental Assessment pp. 95-110

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

---

[x] 106 Advisor
Name: Matthew Virta
Date: 03/06/2015

Check if project does not involve ground disturbance **[ ]**
Assessment of Effect: __ No Potential to Cause Effect __ No Historic Properties Affected __ No Adverse Effect __ Adverse Effect __ Streamlined Review
Recommendations for conditions or stipulations:

[ ] Anthropologist
Name:
Date:

Check if project does not involve ground disturbance **[ ]**
Assessment of Effect: __ No Potential to Cause Effect __ No Historic Properties Affected __ No Adverse Effect __ Adverse Effect __ Streamlined Review
Recommendations for conditions or stipulations:

[X] Archeologist
Name: Matt Virta
Date: 03/06/2015

Check if project does not involve ground disturbance **[ ]**
Assessment of Effect: __ No Potential to Cause Effect __ No Historic Properties Affected __ No Adverse Effect __ Adverse Effect __ Streamlined Review
Recommendations for conditions or stipulations:

[X] Historian
Name: Simone Monteleone
Date: 03/06/2015

Check if project does not involve ground disturbance **[ ]**
Assessment of Effect: __ No Potential to Cause Effect __ No Historic Properties Affected __ No Adverse Effect __ Adverse Effect __ Streamlined Review
Recommendations for conditions or stipulations:

[X] Historical Architect
Name: Stephen Pisani
Date: 03/06/2015

Check if project does not involve ground disturbance **[ ]**
Assessment of Effect: __ No Potential to Cause Effect __ No Historic Properties

Affected __ No Adverse Effect __ Adverse Effect __ Streamlined Review
Recommendations for conditions or stipulations:

[X] Historical Landscape Architect
Name: Maureen Joseph
Date: 03/06/2015

Check if project does not involve ground disturbance **[ ]**
Assessment of Effect: __ No Potential to Cause Effect __ No Historic Properties
Affected __ No Adverse Effect __ Adverse Effect __ Streamlined Review
Recommendations for conditions or stipulations:

[X] Other Advisor
Name: Claire Rozdilski
Date: 03/06/2015

Check if project does not involve ground disturbance **[ ]**
Assessment of Effect: __ No Potential to Cause Effect __ No Historic Properties
Affected __ No Adverse Effect __ Adverse Effect __ Streamlined Review
Recommendations for conditions or stipulations:

[ ] Curator
Name:
Date:
Comments:

Check if project does not involve ground disturbance **[ ]**
Assessment of Effect: __ No Potential to Cause Effect __ No Historic Properties Affected __ No Adverse Effect __ Adverse Effect __ Streamlined Review
Recommendations for conditions or stipulations:

Doc Method:

Streamlined Activity:

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:

_____ No Potential to Cause Effects

_____ No Historic Properties Affected

_____ **No Adverse Effect**

X **Adverse Effect**

2. Documentation Method:

[x] A. STANDARD 36 CFR PART 800 CONSULTATION
Further consultation under 36 CFR Part 800 is needed.

[ ] B. STREAMLINED REVIEW UNDER THE 2008 SERVICEWIDE PROGRAMMATIC AGREEMENT (PA)

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

APPLICABLE STREAMLINED REVIEW Criteria
(Specify 1-16 of the list of streamlined review criteria.)

[ ] C. PLAN-RELATED UNDERTAKING

Consultation and review of the proposed undertaking were completed in the context of a plan review process, in accordance with the 2008 Servicewide PA and 36 CFR Part 800.
Specify plan/EA/EIS:

[ ] D. UNDERTAKING RELATED TO ANOTHER AGREEMENT
The proposed undertaking is covered for Section 106 purposes under another document such as a statewide agreement established in accord with 36 CFR 800.7 or counterpart regulations.

_____

[ ] E. COMBINED NEPA/NHPA Document
Documentation is required for the preparation of an EA/FONSI or an EIS/ROD has been developed and used so as also to meet the requirements of 36 CFR 800.3 through 800.6

[ ] G. Memo to SHPO/THPO

[ ] H. Memo to ACHP

3. Additional Consulting Parties Information:

Additional Consulting Parties: No

4. Stipulations and Conditions:

Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

5. Mitigations/Treatment Measures:

Measures to prevent or minimize loss or impairment of historic/prehistoric properties:
To mitigate potential adverse effects as the planning and design of the Fort Hunt Park project moves forward, it is recommended that a Memorandum of Agreement (MOA) or Programmatic Agreement (PA) be developed. The development of design and construction adhering to the standards and policies appropriate for new construction in historic landscapes and involving historic structures would serve to mitigate potential adverse effects of the action in both Alternative 4 and Alternative 5.

Consider undertaking an evaluation of National Register eligibility of park resources potentially significant for their association with the Mission 66 program, including the picnic pavilion at Area A; the Area C and E restrooms and associated ornamental plantings; the loop road, parking areas and other elements of the circulation system; and the ballfields.

Consider establishing design criteria for the rehabilitation of the NCO Quarters, design of the interpretive and recreation trail, and design of new visitor service facilities to provide guidance to ensure the impacts to historic resources are minimized. Guidance should be firmly based in the appropriate NPS historic resource policy documents and Secretary of Interior's standards for treatment of historic properties.

Undertake addition of the trail that reuses historic roadbeds in a way that preserves associated tree rows.

The MOA or PA should stipulate what steps would be taken to identify undocumented archeological resources in the limits of disturbance for any of the selected improvements once an alternative is selected. If previously undocumented but potentially eligible archeological deposits are identified, the MOA or PA should stipulate the steps required to evaluate their eligibility for NRHP listing and possible mitigation options to be adopted, if necessary.

The MOA or PA should also consider provisions for Consulting Parties to be invited to review and comment on the design process at defined points along the way. The MOA or PA should also consider incorporating public presentations to update interested stakeholders on the progress of the design of the projects.

D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:

Compliance Specialist:

NHPA Specialist

Matthew Virta _____ **Date:** _____

E. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Signature

Superintendent: _____ **Date:** _

Alex
Romero

Appendix C

Federal Coastal Consistency Determination

Federal Coastal Consistency Determination
Fort Hunt Park Site Development Plan / Environmental Assessment
Fairfax County, Virginia

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

The NPS proposes to redevelop Fort Hunt Park in a manner that balances current visitor uses with an expanded interpretation program that enhances the park's cultural and historical resources (Proposed Action). 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 a number of historic structures including four Spanish-American War-Era gun batteries, a Battery Commander's Station, and a Non-Commissioned Officer's (NCO) quarters.

The NPS is preparing an environmental assessment (EA) that analyzes impacts potentially resulting from the implementation of the Proposed Action at Fort Hunt Park. The EA analyzes two action alternatives in addition to the No Action Alternative. The NPS has determined that the Proposed Action would have less than significant effects on land and water uses and natural resources of the Commonwealth of Virginia's coastal zone and is consistent to the maximum extent practicable with the enforceable policies of the Virginia Coastal Zone Management Program.

Proposed Action Alternatives

The following elements are common to both Action Alternatives included in the Proposed Action:

- Construct a new interpretative trail approximately 6,200 linear feet in length
- Restore the historic sight line from Battery Robinson to the Potomac River
- Establish Historic Land Use Restoration Areas, including the repurposing of an existing ball field to accommodate multiple types of recreation
- Enhance access and recreational amenities on an existing shared use trail
- Upgrades to safety and accessibility of selected playground equipment
- Maintain existing internal park roadway configuration with option for road removal and realignment

Enforceable Policies

Virginia's federally-approved Coastal Zone Management Program encompasses nine enforceable policies for the coastal area pertaining to:

- Fisheries management
- Subaqueous lands management
- Wetlands management
- Dunes management
- Non-point source pollution control
- Point source pollution control
- Shoreline sanitation
- Air pollution control

- Coastal lands management

A summary analysis of how the Proposed Action would affect each of the enforceable policies is presented in Table 1. This analysis is based on the more detailed analyses contained in the EA being prepared by the NPS.

Table 1 – Summary of Effects of the Proposed Action on Virginia's Enforceable Coastal Zone Management Policies

Policy	Consistent to the Maximum Extent Practicable?
Fisheries Management The program stresses the conservation and enhancement of finfish and shellfish resources and the promotion of commercial and recreational fisheries to maximize food production and recreational opportunities. This program is administered by the Marine Resources Commission (MRC) (Virginia Code §28.2-200 through §28.2-713) and the Department of Game and Inland Fisheries (DGIF) (Virginia Code §29.1-100 through §29.1-570). The State Tributyltin (TBT) Regulatory Program has been added to the Fisheries Management program. The General Assembly amended the Virginia Pesticide Use and Application Act as it related to the possession, sale, or use of marine antifoulant paints containing TBT. The use of TBT in boat paint constitutes a serious threat to important marine animal species. The TBT program monitors boating activities and boat painting activities to ensure compliance with TBT regulations promulgated pursuant to the amendment. The MRC, DGIF, and Virginia Department of Agriculture and Consumer Services share enforcement responsibilities (Virginia Code §3.2-3904 and §3.2-3935 to §3.2-3937).	**Not Applicable (NA)** Activities included in the Proposed Action would occur entirely on uplands within Fort Hunt Park and would have no potential to affect fisheries. None of the proposed projects would involve the user of marine paints. Therefore, this enforceable policy is not applicable to the Proposed Action.
Subaqueous Lands Management The management program for subaqueous lands establishes conditions for granting or denying permits to use state-owned bottomlands based on considerations of potential effects on marine and fisheries resources, wetlands, adjacent or nearby properties, anticipated public and private benefits, and water quality standards established by the DEQ Water Division. The program is administered by the MRC (Virginia Code §28.2-1200 through §28.2-1213).	**NA** None of the activities included in the Proposed Action would occur in, on or over bodies of surface water and would not involve disturbance of state-owned bottomlands. For these reasons, this enforceable policy is not applicable to the Proposed Action.

Policy	Consistent to the Maximum Extent Practicable?
Wetlands Management The purpose of the wetlands management program is to preserve tidal wetlands, prevent their despoliation, and accommodate economic development in a manner consistent with wetlands preservation. (i) The tidal wetlands program is administered by the MRC (Virginia Code §28.2-1301 through §28.2-1320). (ii) The Virginia Water Protection Permit program administered by the DEQ includes protection of wetlands --both tidal and non-tidal. This program is authorized by Virginia Code §62.1-44.15.20 and §62.1-44.15-21 and the Water Quality Certification requirements of §401 of the Clean Water Act of 1972.	**NA** None of the activities included in the Proposed Action involve draining, filling, or disturbances to wetlands. Thus, this policy is not applicable to the Proposed Action.
Dunes Management Dune protection is carried out pursuant to the Coastal Primary Sand Dune Protection Act and is intended to prevent destruction or alteration of primary dunes. This program is administered by the Marine Resources Commission (Virginia Code §28.2-1400 through §28.2-1420).	**NA** No dunes are located within the boundary of Fort Hunt Park. Therefore, this enforceable policy is not applicable to the Proposed Action.
Non-point Source Pollution Control Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. This program is administered by DEQ (Virginia Code §62.1-44.15:51 et seq.).	**YES** Construction activities associated with the implementation of the Proposed Action would adhere to erosion and sediment control practices specified in erosion and sediment control plans, stormwater pollution prevention plans (SWPPPs), General Permits for the Discharge of Stormwater from Construction Activities (Construction General Permits), and/or other applicable permits and documentation. The implementation of the Proposed Action would not create new, permanent non-point sources of pollution. For these reasons, the Proposed Action would be consistent to the maximum extent practicable with this enforceable policy.

Policy	Consistent to the Maximum Extent Practicable?
Point Source Pollution Control The point source program is administered by the State Water Control Board pursuant to Virginia Code §62.1-44.15. Point source pollution control is accomplished through the implementation of the National Pollutant Discharge Elimination System (NPDES) permit program established pursuant to §402 of the federal Clean Water Act and administered in Virginia as the VPDES permit program. The Water Quality Certification requirements of §401 of the Clean Water Act of 1972 is administered under the Virginia Water Protection Permit program.	**NA** The Proposed Action would not create new, permanent point sources of pollution. Therefore, this enforceable policy is not applicable to the Proposed Action.
Shoreline Sanitation The purpose of this program is to regulate the installation of septic tanks, set standards concerning soil types suitable for septic tanks, and specify minimum distances that tanks must be placed away from streams, rivers, and other waters of the Commonwealth. This program is administered by the Department of Health (Virginia Code §32.1-164 through §32.1-165).	**NA** This enforceable policy is not applicable because no septic tanks are located within Fort Hunt Park, and none would be installed as part of the Proposed Action.
Air Pollution Control The program implements the federal Clean Air Act to provide a legally enforceable State Implementation Plan for the attainment and maintenance of the National Ambient Air Quality Standards. This program is administered by the State Air Pollution Control Board (Virginia Code §10.1-1300 through 10.1-1320).	**YES** Emissions of criteria pollutants from construction activities associated with the implementation of the Proposed Action would be typical of small- to medium-sized earth-moving and construction projects and are anticipated to be minimal. Construction-related emissions would be distributed over a period of several years during the implementation phase of the Proposed Action, further minimizing impacts. Best management practices such as wetting pavements, vegetating soils that would be exposed for extended periods, and covering loads hauled to and from the project sites, would minimize the generation of fugitive dust. No new, permanent sources of emissions would be created as part of the Proposed Action. For these reasons, the Proposed Action would be consistent to the maximum extent practicable with this enforceable policy.

Policy	Consistent to the Maximum Extent Practicable?
Coastal Lands Management Coastal Lands Management is a state-local cooperative program administered by DEQ's Water Division and 84 localities in Tidewater, Virginia established pursuant to the Chesapeake Bay Preservation Act (Virginia Code §§ 62.1-44.15:67 through 62.1-44.15:79) and Chesapeake Bay Preservation Area Designation and Management Regulations (Virginia Administrative Code 9 VAC 25-830-10 et seq.).	**YES** None of the activities included in the Proposed Action would occur within designated 100-foot Resource Protection Areas (RPAs), nor would they involve the filling or disturbance of tidal and non-tidal wetlands. As applicable, Construction contractors would obtain a Construction General Permits and would prepare a site-specific SWPPP and an erosion and sediment control plan as a condition of receiving the permit. Erosion and sediment control measures specified in the SWPPP and erosion and sediment control plans would be implemented to minimize erosion and sediment impacts on downstream watercourses resulting from exposed, disturbed, and/or stockpiled soils and the temporary loss of impervious and/or vegetative cover. The vegetation of disturbed areas not paved or otherwise built on following construction activities, and the re-vegetation of areas of compacted soils within the park, would partially offset any increases in impervious surface resulting from the implementation of the Proposed Action. Therefore, the Proposed Action would be consistent to the maximum extent practicable with this enforceable policy.

Summary of Findings

Based upon the preceding information, data, and analysis, the NPS finds that the Fort Hunt Park Site Development Plan / EA 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 concurrence of the Virginia Coastal Zone Management Program 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:

Claire Rozdilski
George Washington Memorial Parkway
Turkey Run Park
McLean, VA 22101

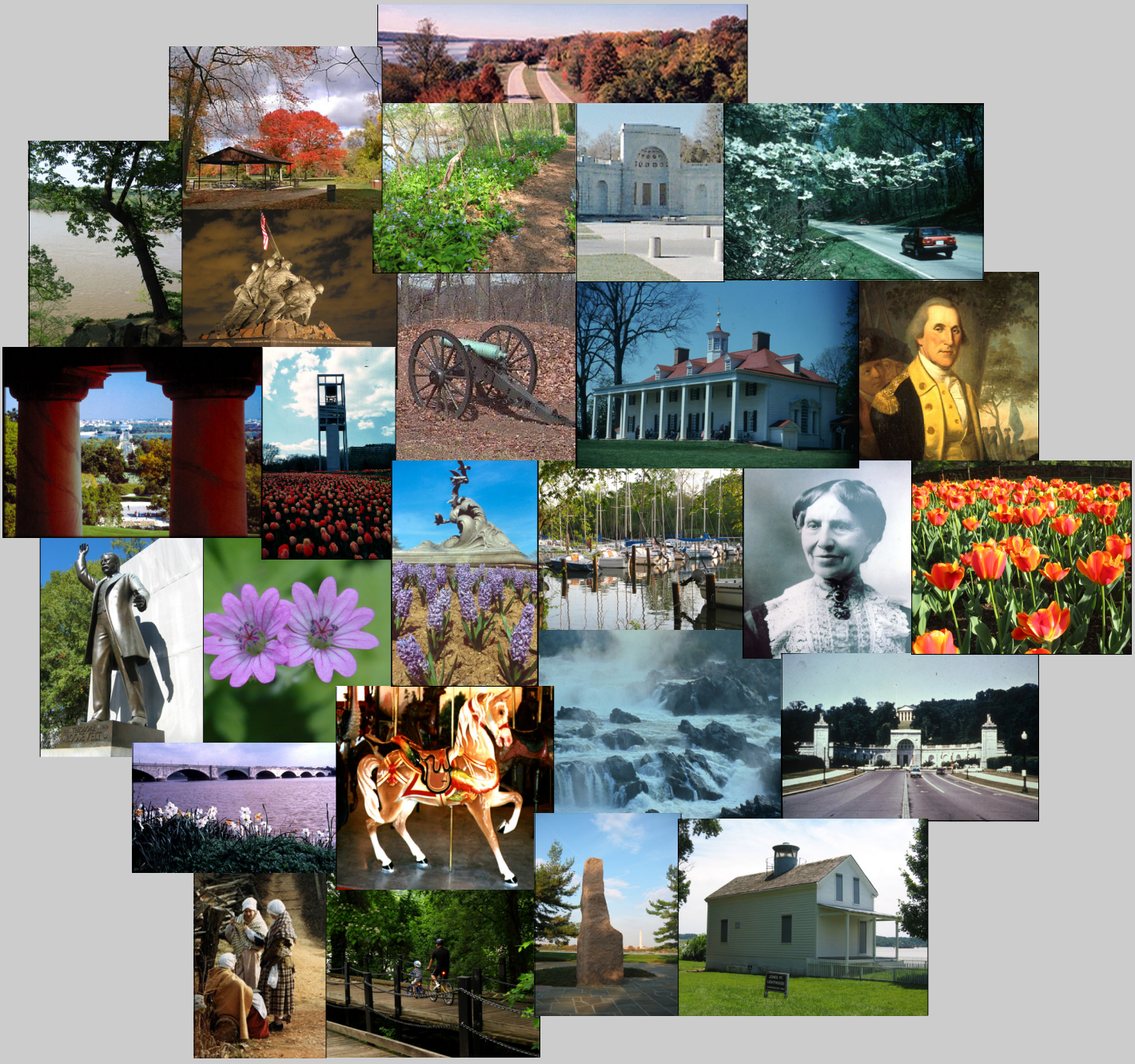
Appendix D

George
Washington
Memorial
Parkway Long
Range Interpretive
Plan

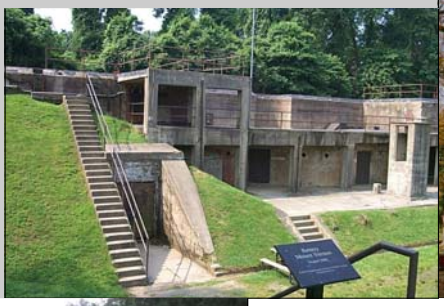
National Park Service
U.S. Department of the Interior

George Washington Memorial Parkway
Virginia/Maryland

George Washington Memorial Parkway
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.

"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"

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.

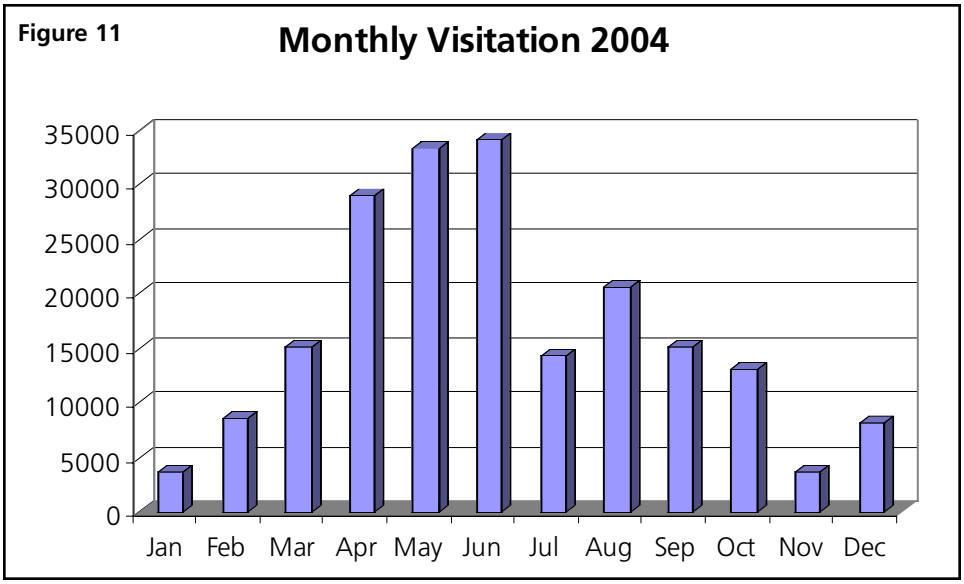
The parkway web site includes a separate page on Fort Hunt Park. This page describes the recreation activities available and the site's multi-faceted history. Two expanded pages provide more in-depth historic accounts.

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

Figure 11



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.

The George Washington Memorial Parkway has several pieces of significant legislation that collectively define the unique character of the park. The parkway also has a diversity of resources that have been put under its administrative control without benefit of any legislation. This would include the U.S. Marine Corps War Memorial.

The following excerpts from legislation associated with the George Washington Memorial Parkway contain language that was considered to have potential influence on the interpretive program.

June 6, 1924 (Public No. 202) - **An Act**
For a comprehensive development of the park and playground system of the National Capital.

That to preserve the flow of water in Rock Creek, to prevent pollution of Rock Creek and the Potomac and Anacostia Rivers, to preserve forests and natural scenery in and about Washington, and to provide for the comprehensive systematic, and continuous development of the park, parkway, and playground system of the National Capital, there is hereby constituted a commission, to be known as the National Capital Park Commission…

March 4, 1925 (Public Resolution - No. 74) - **Joint Resolution**
Authorizing the restoration of the Lee Mansion in the Arlington National. Cemetery, Virginia.

Whereas the era of internecine strife among the States having yielded to one of better understanding, of common loyalty, and of a more perfect Union: and
Whereas, now honor is accorded Robert E. Lee as one of the great military leaders of history, whose exalted character, noble life, and eminent services are recognized and esteemed, and whose manly attributes of percept and example were compelling factors in cementing the American people in bonds of patriotic devotion and action against common external enemies in the war with Spain and in the World War, thus consummating the hope of a reunited country that would again swell the chorus of the Union: Therefore be it,

Resolved…That the Secretary of War be, and he is hereby, authorized and directed, as nearly as may be practicable, to restore the Lee Mansion in the Arlington National Cemetery, Virginia, to the condition in which it existed immediately prior to the Civil War and to procure, if possible, articles of furniture and equipment which were then in the mansion and in use by the occupants thereof. He is also authorized, in his discretion, to procure replicas of the furniture and other articles in use in the mansion during the period mentioned, with a view to restoring, as far as may be practicable, the appearance of the interior of the mansion to the condition of its occupancy by the Lee family.

May 23, 1928 - An Act
Authorizing the construction of the Mount Vernon Memorial Highway.

That the United States Commission for the Celebration of the Two Hundredth Anniversary of the Birth of George Washington…is hereby authorized and directed to take such steps as may be necessary to construct a suitable memorial highway to connect Mount Vernon, the home and burial place of George Washington, in the State of Virginia, with the south end of the Arlington Memorial Bridge, now being constructed across

the Potomac River at the city of Washington, District of Columbia…

May 29, 1930 (46 Stat. 482) - An Act
For the acquisition, establishment, and development of the George Washington Memorial Parkway along the Potomac from Mount Vernon and Fort Washington to the Great Falls, and to provide for the acquisition of lands in the District of Columbia and the States of Maryland and Virginia requisite to the comprehensive park, parkway, and playground system of the National Capital.

(a) For the George Washington Memorial Parkway, to include the shores of the Potomac, and adjacent lands, from Mount Vernon to a point above the Great Falls on the Virginia side…*and including the protection and preservation of the natural scenery of the Gorge and the Great Falls of the Potomac, the preservation of the historic Patowmack Canal, and the acquisition of that portion of the Chesapeake and Ohio Canal below Point of Rocks…That the acquisition of any land in the Potomac River Valley for park purposes shall not debar or limit, or abridge its use for such works as Congress may in the future authorize for the improvement and the extension of navigation, including the connecting of the upper Potomac River with the Ohio River, or for flood control or irrigation or drainage, or for the development of hydroelectric power.*

(b) For the extension of Rock Creek Park into Maryland as may be agreed upon between the National Capital Park and Planning Commission and the Maryland National Capital Park and Planning Commission.
Sec. 3. Whenever the use of the Forts Washington, Foote, and Hunt, or either of them, is no longer deemed necessary for military purposes they shall be turned over to the Director of Public Buildings and Public Parks of the National Capital, without cost, for administration and maintenance as a part of the said George Washington Memorial Parkway.

June 29, 1955 (Public Law 107, Res. 62) - **Joint Resolution** Dedicating the Lee Mansion in Arlington National Cemetery as a permanent memorial to Robert E. Lee.

Whereas the ninth day of April 1955 is the ninetieth anniversary of the Appomattox cessation of hostilities between our states; and

Whereas of the two great figures therein involved, one, General Ulysses S. Grant, has been highly honored by becoming President of the United States, but the other, Robert E. Lee, has never been suitably memorialized by the National Government; and

Whereas Robert E. Lee had graduated by West Point, dedicated himself to an Army career, and became a colonel in the United States Army, then the commander of the Confederate forces, attained world renown as a military genius, and after Appomattox fervently devoted himself to peace, to the reuniting of the Nation, and to the advancement of youth education and the welfare and progress of mankind, becoming president of the Washington and Lee University at Lexington, Virginia; and

Whereas the desire and hope of Robert E. Lee for peace and unity within our Nation has come to pass in the years since his death, and the United States of America now stands united and firm, indivisible, and unshakable; and
Whereas Public Resolution Numbered 74, Sixty-eight Congress, approved March 4, 1925, provided for the physi-

cal restoration of the Lee Mansion but did not dedicate the same as a permanent memorial to Robert E. Lee: Now, therefore, be it

Resolved…That the Congress of the United States, at this anniversary time, does hereby pay honor and tribute to the everlasting memory of Robert E. Lee, whose name will ever be bright in our history as a great military leader, a great educator, a great American, and a truly great man through the simple heritage of his personal traits of high character, his grandeur of soul, his unfailing strength of heart.

Sec. 2. That the Congress of the United States does here by express its humble gratitude to a kind Providence for blessing our Nation with leaders of true greatness who, like Robert E. Lee, have been able to see beyond their times, and by whose vision, guidance, and wisdom this Nation has gone forward to a place of world leadership as the unfaltering and powerful champion of peace, liberty, and justice.

Sec. 3. That the magnificent manor house situated in its prominent position at the brow of a hill overlooking the Potomac River in Arlington National Cemetery, and popularly know as Lee Mansion, be officially designated as the Custis-Lee Mansion, so as to give appropriate recognition to the illustrious Virginia family in which General Lee found his wife, and that the Custis-Lee Mansion is hereby dedicated as a permanent memorial to Robert E. Lee…

August 18, 1959 (Public Law 86 - 170, Res. 5138) **- An Act**
To extend the grounds of the Custis-Lee Mansion in Arlington National Cemetery.

That to make possible the restoration and preservation of a portion of the historic grounds associated with the Custis-Lee Mansion which, pursuant to the Act of June 29, 1955, has been dedicated as a permanent memorial to Robert E. Lee, the Secretary of the Army is authorized and directed to transfer to the jurisdiction of the Secretary of the Interior, without remuneration, for addition to the Custis-Lee Mansion, approximately 0.76 acre of land within the Arlington National Cemetery lying immediately south of the Custis-Lee Mansion,…

June 30, 1972 (Public Law 92 - 333, Res. 10595) **- An Act**
To restore to the Custis-Lee Mansion located in the Arlington National Cemetery, Arlington, Virginia, its original historical name, followed by the explanatory memorial phrase, so that it what be known as Arlington House, The Robert E. Lee Memorial.

January 11, 1973 (H.R. 1892) - **A Bill**
To provide for the establishment of the Clara Barton National Historic Site in the State of Maryland, and for other purposes.

…to preserve in public ownership the historically significant property associated with the life of Clara Barton, for the benefit and inspiration of the people of the United States…