



FINDING OF NO SIGNIFICANT IMPACT

Anacostia Park Management Plan

The National Park Service (NPS) proposes to implement a plan for managing Anacostia Park (the park) for the next 15 to 20 years. The purpose of this management plan is to develop a framework for future decision making consistent with the goals for the park; to provide broad guidance and long-term strategies for park operations, resource protection, and restoration; to promote partnership opportunities that will support and complement management of the park; and to define desired resource conditions and recommend actions that will lead to those conditions.

The National Park Service prepared an environmental assessment (EA) to evaluate alternatives for this management plan. The EA described the no-action alternative (alternative 1), the NPS preferred alternative (alternative 3), and two other action alternatives (alternatives 2 and 4). The EA also analyzed the potential impacts these alternatives would have on the natural, cultural, and human environment.

The EA and this finding of no significant impact (FONSI) have been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended [42 United States Code (USC) 4332(2) (C)]; the implementing regulations of the Council on Environmental Quality (CEQ) [40 Code of Federal Regulations (CFR) 1500-1508.9]; the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director's Order (DO) 12: *Conservation Planning, Environmental Impact Analysis and Decision-making* (DO-12) and the accompanying NPS NEPA Handbook.

NPS SELECTED ALTERNATIVE

The alternative selected by the National Park Service for implementation is identified as alternative 3, as described on page 23 and shown on figure 3 of the EA, with descriptions of the management zones on pages 14–20 of the EA. The management zones in the selected alternative establish management zones for the park that describe the desired future resource and visitor experience conditions for various areas of the park. The zoning plan in the selected alternative includes a natural resource recreation zone, organized sport zone, community activities zone, golf course zone, and areas for special and administrative uses. For more information on the management zones, see pages 14–20 of the EA, and figure 3 of the EA for how those management zones will be distributed throughout the park under the NPS selected alternative. It should be noted that on page 25, in Figure 3, the map shows the North Field with three delineated ballfields and mistakenly zoned as “Organized Sport and Recreation Zone.” There are no current or planned ball fields at this location and the North Field in its entirety was intended to be classified as “Community Activities and Special Events Zone.” These corrections are made in the attached Errata sheet. These corrections do not affect the decision to choose Alternative 3 as the selected alternative. The following summarizes the NPS selected alternative.

The vision for the NPS selected alternative is enhanced recreational and educational opportunities situated within an expanded and healthy natural areas system. Under the NPS selected alternative, 48 percent of the total park will consist of natural areas.

Visitors will experience a revitalized park with enhanced opportunities for land and water-based active and passive recreation in a naturalized park setting with a diverse river landscape and ecologically enhanced river system. The existing water and land trail systems along the east and west shores of the Anacostia River will be retained and enhanced, and the National Park Service will continue to work with its partners to further develop these systems.

Facilities supporting sports play will be consolidated, with the current organized sports capacity retained or slightly expanded. The park will maintain facilities for neighborhood and regional recreation. No new

major cultural facilities will be added, though programming for heritage tourism, natural area exploration, and park interpretation will be expanded. Concession food trucks and vendors will be limited to designated developed areas.

Public access to the river for boating will be enhanced throughout the park by providing boat launches, boat tie-ups, and sites potentially supporting concessioner-provided boat rental open to the public. More convenient park access and connectivity with city neighborhoods will be developed through enhanced and expanded land and water trails, bicycle infrastructure, gateways and portals, public transit, and waterborne transportation.

Environmental rehabilitation will continue along the waterfront, stream corridors, wetlands, and forests, as well as in management zones as needed. Remediation of contaminants affecting park resources will enhance, where possible, the riparian corridor, including its ecological functionality, scenery, habitat, wetlands, resiliency, and aesthetics. Within the natural resource recreation zone, natural areas will be created through wide bands of plantings along riparian corridors and between more developed recreational zones, creating a network of naturalized areas interwoven with more developed use-intensive areas.

Future memorials will be located based on the Memorials and Museums Master Plan (NCPC 2006) and incorporated into areas approved by the National Park Service.

RATIONALE FOR DECISION

The National Park Service selected alternative 3 because it provides the most balanced combination of recreation areas and natural areas (48% natural resource zone, and the balance of the park managed by a variety of sport and community zones); this will provide maximum flexibility and diversity in visitor activity and recreation opportunities in the park while limited impacts to resources. Alternative 3 also includes management actions that would balance the rehabilitation of natural areas with sports and recreation facilities in the park.

MITIGATION

A variety of mitigation measures will be instituted as actions are taken to implement this alternative. The National Park Service will implement an appropriate level of monitoring when construction is taking place to help ensure that protective measures are being properly implemented and are achieving their intended results. The exact mitigation measures to be implemented will depend upon the future compliance and final designs and approvals of plans by relevant agencies. A list of actions that may take place is included in Appendix D.

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

As defined in 40 CFR 1508.27, the significance of an impact is determined by examining the criteria listed below. Please note that descriptions of impacts have been narrowed from those of the comprehensive alternatives to focus on those impacts relevant to the actions associated with the NPS selected alternative. Please note, as discussed in the description of the selected alternative, there was an error on the map on page 25, which depicted the North Field with three delineated ballfields and incorrectly zoned as "Organized Sports and Recreation Zone." This area should be classified as "Community Activities and Special Events Zone." These corrections are made in the attached Errata sheet. The area corrected on Figure 3 of the EA represents an approximate 1.4 percent change in these respective zones and does not affect the overall impact analysis of this alternative, as described in chapter 3 of the EA.

Impacts that may be both beneficial and adverse. A significant impact may exist even if the federal agency believes that on balance the effect will be beneficial. As described in chapter 3 of the EA, the NPS selected alternative will result in beneficial and/or adverse impacts on several park resources, including soils and sediments, wetlands, upland vegetation, floodplains, archeological resources, cultural resources, and visitor use and experience. No significant impacts were identified that require analysis in an environmental impact statement, as described in chapter 3 of the EA. Since many of the actions

implemented under this plan would require their own compliance and no design work has been completed, specific information regarding the actual area, exact extent of physical disturbance, and mitigations cannot be determined at this time. Anticipated impacts that will occur to the affected resources are summarized qualitatively below. For further details, see chapter 3 of the EA.

Soils and Sediments. The NPS selected alternative will result in both adverse and beneficial impacts on soils and sediments. Adverse impacts on soils and sediments will generally result from soil exposure and compaction during construction activities for development of park facilities during future projects tiered to the management plan. Impacts may include loss of soil, alterations in soil chemistry, and reduction in soil biological activity from compaction. Beneficial impacts on soils and sediment will generally occur due to the development and restoration of natural areas within the park. Beneficial impacts may include long term stabilization, improved soil fertility, soil chemical balance, soil moisture holding capacity, structure, soil temperature, and biological activity.

Wetlands. The NPS selected alternative will result in both adverse and beneficial impacts on wetlands. Adverse impacts will generally occur due to expansion of, improvements to, or new construction of water-related facilities, including piers, docks, boat ramps, and canoe/kayak launches. Beneficial impacts on wetlands will generally occur due to the possible wetland restoration efforts the National Park Service may undertake in the natural resource recreation zone. Potential wetland restoration projects will protect and preserve the existing wetlands, with the potential to increase the intrinsic function and value of the total park wetlands. Specific wetland and ecosystem rehabilitation projects will be determined at a later time and their impacts assessed in separate, tiered compliance documents.

Upland Vegetation. The NPS selected alternative will result in both adverse and beneficial impacts on upland vegetation. In general, adverse impacts will be due to upland vegetation disturbance by partial or complete clearing for implementation of recreational or other facility expansion projects, including rehabilitation of existing park facilities or construction of new park facilities and may include permanent removal of vegetation for new facilities. Beneficial impacts will result from ecosystem rehabilitation activities. Restoration of some upland woodland sites will result in a long-term beneficial impact on the park's upland vegetation in these areas.

Floodplains. The NPS selected alternative will result in both adverse and beneficial impacts on floodplains. Because much of the park is within the 100-year floodplain, new development and facility expansion will have the potential to displace a small volume of flood waters and impact floodplain functions and values, primarily water storage. Beneficial impacts will generally result from natural area restoration within the floodplain. Any natural area restoration within the floodplain will likely result in improvements related to flood dissipation, flood storage, water quality, and wildlife habitat functions of floodplains in several areas of the park. Newly created natural resources and recreation zones will include managed plantings at the Kenilworth Maintenance Yard, the shoreline of River Terrace, Fairlawn, the western shoreline of Kingman Lake, and the riparian area adjacent to Kingman Marsh at the Langston Golf Course. Beneficial impacts to the floodplain will occur at these sites because managed plantings will enhance wildlife habitat corridors, allow for sediment retention and greater nutrient absorption, and increase opportunities for environmental floodplain education and awareness.

Archeological Resources. The NPS selected alternative will result in both adverse and beneficial impacts on archeological resources. Adverse impacts on archeological resources will generally result from future ground-disturbing activities that may tier to this management plan and could include disturbance of unknown intact archeological resources. As appropriate, proposed construction sites will be surveyed to identify archeological resources that may be present, with the goal of avoiding, minimizing, or mitigating any potential adverse impacts. Future construction actions involving ground surface disturbance throughout the park will be subject to individual NEPA compliance and Section 106 compliance.

Cultural Resources. The NPS selected alternative will result in both adverse and beneficial impacts on cultural resources. Adverse impacts will generally result from changes to the cultural landscapes and historic setting within the park from future projects that may tier to this management plan. However, all future development projects will require separate compliance and mitigation measures, as appropriate.

Beneficial impacts will generally occur from preservation or rehabilitation of the cultural landscapes and historic structures within the park. Areas designated as natural resource recreation zone will generally preserve and restore the natural setting and landscape of these areas of the park. Additionally, all zones containing cultural resources include preservation of those resources within the desired resource condition.

Visitor Use and Experience. The NPS selected alternative will result in both adverse and beneficial impacts on visitor use and experience. Adverse impacts will generally result from temporary closures of portions of the park during construction activities. Beneficial impacts will generally result from expanded recreational and educational opportunities within the park. The NPS selected alternative will provide a mix of developed and natural recreation experiences, which will result in a wide range of activities available to visitors. The NPS selected alternative will also facilitate more convenient park access and connectivity with city neighborhoods through enhanced and expanded land and water trails, bicycle infrastructure, gateways and portals, public transit, and waterborne transportation.

The degree to which the proposed action affects public health or safety. The NPS selected alternative has some risk to public safety during the time that construction activities are occurring; however, this risk is considered to be very low and will be further minimized during construction/demolition by implementing measures such as fencing and monitoring to block visitor access to the site.

Unique characteristics of the geographical area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas. No prime farmlands, wild and scenic rivers, ecologically critical areas, sacred sites, or Indian Trust resources are located within the project area; therefore, none will be affected by the NPS selected alternative.

Several cultural resources that are listed or are eligible for listing on the National Register exist within the park boundaries. These include cultural landscapes, historic structures and objects, and ethnographic resources. Specific resources within the project area include Kenilworth Aquatic Gardens, Langston Golf Course Historic District, Anacostia Park cultural landscape, Anacostia Field House, the Anacostia River seawall, DC Water Poplar Point Pump House, Bonus Army Encampment site, and the National Capital Parks–East (NACE) Headquarters and US Park Police (USPP) Facilities. Although adverse impacts on these cultural resources will occur, there will be no major changes in the site's design or obstruction of significant views or viewsheds. With the exception of the seawall, there will be no destruction of character-defining features. Small portions of the Anacostia seawall may be removed to encourage wetland function within the natural resource recreation zone. However, the loss of historic material will be localized with specific locations for removal determined during future projects tied to this management plan and subject to additional NEPA and National Historic Preservation Act (NHPA) Section 106 compliance.

Archeological resources are known to be located within the vicinity of the project area. Some areas of the park are known to be archeologically sensitive. Implementation of the NPS selected alternative will likely require ground disturbance for new facilities throughout the park. However, future construction actions involving ground surface disturbance throughout the park will be subject to individual tiered NEPA compliance and Section 106 compliance. As appropriate, proposed construction sites will be surveyed to identify archeological resources that may be present and identified resources will be avoided to the extent practicable.

Several wetlands exist within the park, including both tidal and non-tidal wetlands. Adverse impacts will generally occur due to expansion of, improvements to, or new construction of water-related facilities and routine maintenance for existing water dependent uses. During construction activities, prior to stabilization of exposed soils, storm water runoff from disturbed sites will have the potential to cause erosion and sedimentation and to convey sediments to tributary streams, storm water drains, and the river. However, use of best management practices as part of an approved Storm Water Pollution Prevention Plan will mitigate the adverse impacts on wetlands. In addition, potential wetland restoration projects will protect and preserve the existing wetlands, with the potential to increase the intrinsic function and value of the total park wetlands. Specific wetland and ecosystem rehabilitation projects will be determined later

and their impacts assessed in separate, tiered compliance documents. Required compliance may include Wetlands Statement of Findings and other federal or state reviews.

The degree to which the effects on the quality of the human environment are likely to be highly controversial. No highly controversial effects in terms of scientific uncertainties as a result of the NPS selected alternative were identified during the preparation of the EA or by the public during the public and agency review period.

The degree to which the potential impacts are highly uncertain or involve unique or unknown risks. No highly uncertain, unique, or unknown risks were identified during preparation of the EA or by the public during the public and agency review period.

The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration. The NPS selected alternative neither establishes NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Impacts of the NPS selected alternative on soils and sediments, wetlands, upland vegetation, floodplains, archeological resources, cultural resources, and visitor use and experience were identified. As described in chapter 3 of the EA, cumulative impacts were determined by combining the impacts of the actions associated with the NPS selected alternative with other present and reasonably foreseeable future actions. Cumulative actions include the following: the construction and use of the Anacostia Riverwalk Trail; the rehabilitation of Langston Golf Course; wetland and resident Canada goose management actions; actions proposed in the Anacostia Watershed Restoration Plan; development of the 11th Street Bridge Park; construction and use of the DC United Soccer Stadium; the land transfer and development of Poplar Point; actions related to the DC Water Clean Rivers project; District of Columbia transportation infrastructure improvement projects including the South Capitol Street corridor, the Barney Circle and Southeast Boulevard transportation and planning feasibility study, the Pennsylvania Avenue–Minnesota Avenue intersection improvement, and the Kenilworth Avenue corridor study; and investigation or remediation of contaminated sites including the Kenilworth Park Landfill site, the Anacostia River bottom, the Poplar Point site, and the Washington Gas site. The impacts of the other present and reasonably foreseeable future actions on resources, in conjunction with the NPS selected alternative, will result in cumulative impacts that are both adverse and beneficial, however, none, in this analysis, will result in the NPS selected alternative contributing or resulting in significant cumulative impacts.

The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources. Several cultural resources that are listed or are eligible for listing on the National Register exist within the park boundaries. These include cultural landscapes, historic structures and objects, and ethnographic resources. Specific resources within the project area include Kenilworth Aquatic Gardens, Langston Golf Course Historic District, Anacostia Park cultural landscape, Anacostia Field House, the Anacostia River seawall, DC Water Poplar Point Pump House, Bonus Army Encampment site, and the National Capital Parks–East (NACE) Headquarters and US Park Police (USPP) Facilities. Although adverse impacts on these cultural resources will occur, there will be no major changes in the site's design or obstruction of significant views or viewsheds. With the exception of the seawall, there will be no destruction of character-defining features. Small portions of the Anacostia seawall may be removed to encourage wetland function within the natural resource recreation zone. However, the loss of historic material will be localized with specific locations for removal determined during future projects tiered to this management plan and subject to additional NEPA and NHPA Section 106 compliance.

Archeological resources are known to be located within the vicinity of the project area. Some areas of the park are known to be archeologically sensitive. Implementation of the NPS selected alternative will likely require ground disturbance for new facilities throughout the park. However, future construction actions involving ground surface disturbance throughout the park will be subject to individual tiered

NEPA and Section 106 compliance. As appropriate, proposed construction sites will be surveyed to identify archeological resources that may be present and identified resources will be avoided to the extent practicable.

Letters were sent to the Advisory Council on Historic Preservation, and the District of Columbia Historic Preservation Office on March 15, 2013. Compliance with Section 106 of the National Historic Preservation Act was conducted separately from, but concurrently to, the EA process. Through conversations with the Historic Preservation Office in April of 2017, it was determined that due to the Plan's broad guidance and long-term strategies for park management and given its general nature, the NPS will conduct full Section 106 consultation as individual elements of the Plan get implemented. As such, on July 10, 2017, the Historic Preservation Office concurred that the proposed plan will have "no adverse effect," conditioned upon future Section 106 consultation being carried out early enough to ensure that a broad range of alternatives may be considered to avoid minimize or mitigate any potential adverse effects on historic properties (see attached).

The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. The National Park Service consulted with the US Fish and Wildlife Service (USFWS) to identify any potential rare, threatened, and endangered species that may occur within the project area. In a letter dated December 7, 2016, the US Fish and Wildlife Service determined that no proposed or federally listed endangered or threatened species are known to exist within the project area. The National Park Service will reinitiate consultation in the unlikely event that any federally listed threatened or endangered species are encountered or if project plans change. The National Park Service also consulted with the National Marine Fisheries Service in a letter dated March 15, 2013. There will be no impacts on federally listed rare, threatened, and endangered species under the proposed action. Though there are several species designated as rare by the District of Columbia and the State of Maryland, adverse impacts can be avoided by timing construction actions to avoid sensitive fish species and nesting seasons of certain birds. Therefore, the NPS selected alternative will have no impact on special status species.

Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment. The NPS selected alternative violates no federal, state, or local environmental protection laws.

PUBLIC INVOLVEMENT

The National Park Service held an open public comment period for the Environmental Assessment from March 27, 2013 to April 29, 2013, as well as a public meeting on March 27, 2013. Three separate stakeholder meetings were also conducted; on April 17, 2013 stakeholder meetings were conducted for District of Columbia agencies, the Anacostia Watershed Society/Kingfisher Water Trail Master Plan, and non-governmental organizations. Scoping information was also posted to the park's Planning, Environment and Public Comment (PEPC) website on March 13, 2013 for 45 days; the Environmental Assessment was posted on PEPC for 60 days on February 1, 2017.

CONCLUSION

In light of the impacts described in the EA for the project and with guidance from NPS *Management Policies 2006*, natural and cultural resources information, professional judgment, and consideration of agency and public comments, the National Park Service has decided to implement the NPS selected alternative, presented as alternative 3 (NPS preferred alternative) in the EA. Implementing the NPS selected alternative will provide a framework for future decision making and management direction for the park. The NPS selected alternative will balance the rehabilitation of natural areas with sports and recreation facilities in the park to transform it into one of the District's major recreational parks and a prime natural exploration area with enhanced river access and a gateway to the Anacostia River.

The NPS selected alternative does not constitute an action that normally requires preparation of an environmental impact statement and, as noted above, impacts resulting from implementing the action will not have a significant effect on the natural, cultural, or human environment. There are no significant impacts on public health, public safety, threatened or endangered species, historic properties either listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified during the impact assessment. Implementing the NPS selected alternative will not violate any federal, state, or local environmental protection laws. The impacts that result from the NPS selected alternative will not impair any park resources or values necessary to fulfill specific purposes identified in the park's enabling legislation (see "Attachment A: Non-Impairment Determination"). Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and thus will not be prepared. This is a finding of no significant impact.

Recommended:


Tara D. Morrison
Superintendent
National Capital Parks–East

10-24-2017

Date

Approved:


Robert A. Vogel
Regional Director
National Capital Region

11-12-17

Date

ATTACHMENT A: NON-IMPAIRMENT DETERMINATION

The National Park Service has developed *Guidance for Impairment Determinations and the NPS NEPA Process* (September 2011). That guidance builds upon the statutory direction of the NPS Organic Act to manage resources “unimpaired for future generations” and the interpretation by the National Park Service of legislative direction in the *NPS Management Policies 2006*.

The *NPS Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

WHAT IS IMPAIRMENT?

NPS Management Policies 2006, Section 1.4.5, What Constitutes Impairment of Park Resources and Values, and Section 1.4.6, What Constitutes Park Resources and Values, provide an explanation of impairment.

Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

The National Park Service has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park (*NPS Management Policies 2006*, Section 1.4.3). However, the National Park Service cannot allow an adverse impact that would constitute impairment of the affected resources and values (*NPS Management Policies 2006*, Section 1.4.3).

Section 1.4.5 of *Management Policies 2006* states:

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

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

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

Per Section 1.4.6 of *Management Policies 2006*, park resources and values that may not be impaired include the following:

- the park’s scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural

landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;

- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessioners, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park, but this would not be a violation of the Organic Act, unless the National Park Service was in some way responsible for the action.

HOW IS AN IMPAIRMENT DETERMINATION MADE?

Section 1.4.7 of *Management Policies 2006* states, "[i]n making a determination of whether there would be an impairment, an NPS decision-maker must use his or her professional judgment." This means that the decision-maker must consider any environmental assessments or environmental impact statements required by the National Environmental Policy Act of 1969; consultations required under Section 106 of the National Historic Preservation Act; relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.

Management Policies 2006 further define "professional judgment" as "a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision-maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities related to the decision."

The *Anacostia Park Management Plan Environmental Assessment* analyzes impacts to the following resources: soils and sediments, wetlands, upland vegetation, floodplains, archeological resources, cultural resources, and visitor use and experience. NPS *Guidance for Non-Impairment Determinations and the NPS NEPA Process* states that:

The impairment determination does not include discussion of impacts to visitor experience, socioeconomics, public health and safety, environmental justice, land use, park operations, etc., as those do not constitute impacts to park resources and values subject to the non-impairment standard.

As a result, for purposes of this document, impairment findings are required for soils and sediments, wetlands, upland vegetation, floodplains, archeological resources, and cultural resources.

NON-IMPAIRMENT DETERMINATION FOR THE NPS SELECTED ALTERNATIVE

This non-impairment determination has been prepared for the NPS selected alternative described on page 23 and shown on figure 3 of the EA, with descriptions of the management zones on pages 14–20 of the EA. A non-impairment determination is made for all relevant resource impact topics analyzed for the NPS selected alternative.

Soils and Sediments

There will be no impairment to soils and sediments under the selected alternative. Watershed management, including addressing the issue of sediment loading in the Anacostia River, is identified as a key issue for National Capital Parks—East. Although the NPS selected alternative will require some level of excavation or grading of the soil profile for future construction activities, and a possible increase in

impervious surfaces for development of new facilities, these soil and sediment disturbances will be localized and mitigated through strict adherence to standard sedimentation and erosion control practices. Soils will continue to support diverse ecosystem functions and foster some of the largest remaining natural areas and habitat in the District of Columbia. Therefore, the NPS selected alternative will not result in an impairment to the park's soils and sediments.

Wetlands

There will be no impairment to wetlands under the selected alternative. Natural communities, including wetlands, are identified as a fundamental resource and value of the park. Although the NPS selected alternative may cause impacts to wetlands through implementing projects such as docks or launch ramps, the location and design of these and other facilities will be subject wetland surveys and compensation for loss of wetlands and wetland function will be required, as appropriate. In addition, mitigation actions will be designed to achieve no net loss of wetland function. While the selected alternative may impact wetlands through future development, it will also allow for future wetland restoration projects, which may result in an increase in the intrinsic function and value of the total park wetlands. The park wetlands will remain an important component of the ecological functionality of the park's natural resources; therefore, the NPS selected alternative will not result in an impairment to wetlands.

Upland Vegetation

There will be no impairment to upland vegetation under the selected alternative. Natural communities, including wooded river edges, are identified as a fundamental resource and value of the park. While this plan may enable some degree of vegetation disturbance from future facility development projects, those impacts are generally expected to be localized to areas with existing development and will also be revegetated to the extent possible after construction. The NPS selected alternative will also allow for ecosystem rehabilitation projects that will preserve and protect natural abundances and diversities of the upland vegetation areas within the park. Because the NPS selected alternative will allow the park to foster some of the largest remaining natural areas and habitat in the District of Columbia, the selected alternative will not result in an impairment to upland vegetation.

Floodplains

The selected alternative will not result in impairment to floodplains. The Anacostia River corridor, including the ecological function of riverine systems, is identified as a fundamental resource and value of the park. Although the selected alternative will allow for the development of new facilities within the 100-year floodplain, the facilities likely to be developed will be focused on recreational and educational facilities, such as trails, fields, kiosks, and gardens; these developments are likely to be non-intrusive and will not constitute major obstructions or consume floodplain storage area. In addition, potential wetland restoration activities enabled by the selected alternative will enhance the flood dissipation, flood storage, water quality, and wildlife habitat functions of floodplains in several areas of the park. Therefore, because overall the selected alternative will encourage restoration of the Anacostia River's ecological values and floodplain functions, it will not result in an impairment to floodplains.

Archeological Resources

The selected alternative will not result in impairment to archeological resources. The park's archeological resources and their role in helping us understand the past, have been identified as an important park resource and value. Under this plan, archeological resources within the park will continue to yield information on the area's history from the earliest human occupation through social movements of the 20th century. Although ground disturbance may occur during future projects enabled by this plan, numerous archeological investigations have taken place at the park and areas of high archeological sensitivity are known; ground disturbance in these areas will be avoided. In the unlikely event that archeological resources are encountered, mitigation measures will be in place to avoid impacts on these resources. In addition, actions outlined in this plan would be subject to additional compliance, which would ensure that these resources would again be studied and measures to avoid, minimize, and mitigate

any potential impacts would be developed. Therefore, the NPS selected alternative will not result in an impairment to archeological resources.

Cultural Resources

The selected alternative will not result in impairment to cultural resources. Cultural resources, including Kenilworth Park and Aquatic Gardens, Langston Golf Course, and the Anacostia seawall, have been identified as contributing to the park's fundamental resources and values. Although the NPS selected alternative will cause some changes to the historic setting of the park's cultural resources, it will not result in major changes to the designs, character-defining features, or obstruction of significant views or viewsheds of Kenilworth Park and Aquatic Gardens, Langston Golf Course, the Anacostia Field House, and the Poplar Point Pump House. Although portions of the Anacostia seawall may be removed to promote wetland restoration, the loss of the seawall and its historic material will be localized and will not affect the entirety of the resource. Other areas of the seawall will remain in place and the resource will continue to serve its intended function of maintaining the reclaimed land of the park and continue to be available for future education and interpretation opportunities by the National Park Service. These cultural resources will continue to reflect their historic and cultural integrity, and the park's purpose and significance will not be altered due to potential changes to the settings of these resources under the NPS selected alternative. The park will continue to be associated with historic events, will maintain its overall design and architecture, and will maintain portions of the seawall that allowed the land reclamation that comprises the park. Therefore, the NPS selected alternative will not result in an impairment to cultural resources.

Summary

The NPS has determined that implementation of the NPS selected alternative will not constitute an impairment of the resources or values of Anacostia Park. As described above, adverse impacts anticipated as a result of implementing the selected alternative on a resource or value whose conservation is necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park, is key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or is identified as significant in the National Capital Parks—East's Foundation Document or other relevant NPS planning documents, will not constitute impairment. This conclusion is based on consideration of the park's purpose and significance, a thorough analysis of the environmental impacts described in the EA, comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction of the NPS Management Policies 2006.

ATTACHMENT B: PUBLIC COMMENT RESPONSE

The *Anacostia Park Management Plan Environmental Assessment* was released for public review on February 1, 2017 and was available via the park's Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/anacostiagmp>) and at the park headquarters. An open public comment period was held from February 1, 2017 through March 31, 2017. During the comment period, a total of 130 correspondences were received, including six letters mailed to the National Park Service and 124 entered directly into the park's PEPC website. Within those correspondences 395 comments were identified, including 311 substantive and 84 non-substantive comments.

According to National Park Service (NPS) Director's Order #12: *Conservation Planning, Environmental Impact Analysis and Decision-Making* (2011) and the accompanying NPS NEPA Handbook (2015), substantive comments are those that 1) question the accuracy of the information in the EA, 2) question the adequacy of the environmental analysis, 3) present reasonable alternatives that were not presented in the EA, or 4) cause changes or revisions in the proposal. The discussion below includes concern statements expressed in the substantive comments and topical responses to those concerns. Changes made to the EA based on these comments are included in an errata list following the summary of comments and responses.

CONCERN

The NPS should maximize the protection and enhancement of natural areas and natural resources within the park to best meet the park's natural and environmental objectives. The NPS should not implement alternatives 2 or 3 because a focus on organized field sports or recreation is in direct conflict with the NPS charge to protect the land and compromises the natural resources.

Representative Quote(s)

Corr ID: 100 Comment ID: 627599

"ALTERNATIVE 2: ...transform it into one of Wash DCs major recreation based parks focused on organized field sports....

conditions: This is not only in direct conflict with NPS charge for this land, but it also squanders this unique and precious resource

...

issue: ALTERNATIVE 3: ...balance natural areas and sports...

conditions: This is not only in conflict with NPS charge for this land, but is also severely compromises this unique and precious resource."

Response

The NPS believes the designated management zones as laid out in the selected alternative will best meet the plan's purpose and need because it provides the best balance of recreational opportunities and natural resource protection. The selected alternative designates 48% of the park as natural resource recreation zone, in which NPS managers will prioritize protection and restoration of the park's natural resources and limit future development.

CONCERN

The NPS should maximize the amount of space available for sports, recreation, and community activities within the park because it is a great need of the nearby communities and because the park is currently underutilized for these purposes. Recreational opportunities should be concentrated where population centers and recreational facilities exist already, and the plan should balance recreation with protection of natural resources because it would provide a backdrop of natural resources while meeting the communities' recreational needs.

Representative Quote(s)*Corr ID: 43 Comment ID: 627235*

“Maximizing, to the extent practical, the amount of space made available for sports and recreation and community activities in Anacostia Park provides the greatest opportunity for meeting this dire need for sports and recreational facilities in DC, while still providing substantial opportunity for natural area preservation and increasing undisturbed green space.”

Corr ID: 98 Comment ID: 627929

“The Anacostia Management Plan (the Plan) should focus on concentrating recreational opportunities where population centers and recreational infrastructure already exist. This would allow for more robust natural areas to serve as a backdrop and resource for recreation and should increase the connectivity—for bicyclists and pedestrians—between Anacostia Park, the nearby neighborhoods, the Anacostia River, and the various Fort Circle Parks.”

Response

The NPS believes the designated management zones as laid out in the selected alternative will best meet the plan’s purpose and need because it provides the best balance of recreational opportunities and natural resource protection. The selected alternative designates 45% of the park as natural resource recreation zone, which will provide a network of naturalized areas interwoven with recreational areas. Many of the areas designated for sports and community activities are located where these activities already take place, such as around existing fields and the Anacostia Pavilion.

CONCERN

The NPS should ensure that there will be flexibility and continuity of use throughout the park across the distinct management zones because the park should continue to maintain its current mix of different activities and services; the NPS should also consider consolidating some types of zones in certain areas.

Representative Quote(s)*Corr ID: 83 Comment ID: 627313*

“Anacostia Park serves a variety of users in different ways, and it is important that the park offer a mix of recreational, educational, social, cultural and natural amenities. We hope and assume that NPS will flexibly treat the boundaries between each of the management zones so that the park has a sense of continuity despite its diversity in use.”

Corr ID: 89 Comment ID: 613260

“We encourage NPS to evaluate ways to consolidate and integrate the zone uses for natural resource recreation, organized sport and recreation, community activities and special events.”

Response

Although different management zones have different focuses, there are similarities in appropriate facilities and activities between many of the zones. While the golf course zone, the park administration and operations zone, and the special use zone are designated for specific and often already existing purposes, the remaining zones allow for overlapping visitor activities such as walking, picnicking, and educational opportunities. As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions in each zone should be implemented. Therefore, specific uses, facilities, and activities will be developed during future, site-specific projects tiered to this plan. These plans may include actions for more than one zone designations, and similar uses between adjacent zones may be considered. These future plans will be subject to additional compliance.

CONCERN

Commenters wanted to ensure that the document clarified the definition of the term “zone,” particularly that there would be flexibility of use between adjacent zones and that the term is not used in the convention of municipal land use zoning.

Representative Quote(s)

Corr ID: 84 Comment ID: 627324

“A second issue related to the zone descriptions is the potential misunderstanding of the terminology of the word “Zone” itself. The document would be better served to more clearly emphasize that the designation of park zones does not seek to specifically exclude select programmatic elements associated with the other zones. The discussion in this section might be strengthened to acknowledge that best practices in landscape design now intentionally integrate a combination of program objectives in a place-based design strategy.

The interweaving of uses and programmatic design objectives is an essential way to create a mixed-use, multi-purpose, performance-oriented riverfront landscape. The opportunity to incorporate human-centered and natural resource performance goals into single projects is one of the most exciting and potentially distinctive strategies for the creation of the civic realm of this part of Washington, D.C. Modest revisions to the text can help emphasize this opportunity and avoid the misunderstanding of comparing the document’s use of the term “zoning” to the conventions of municipal land use zoning.”

Response

As discussed on page 14 of the EA, management zones only describe the desired future resource and visitor experience conditions rather than identify specific facilities or activities that are permitted or excluded in each zone. Although different management zones have different focuses, there are similarities in appropriate facilities and activities between many of the zones. While the golf course zone, the park administration and operations zone, and the special use zone are designated for specific and often already existing purposes, the remaining zones allow for overlapping visitor activities such as walking, picnicking, and educational opportunities. Specific uses, facilities, and activities will be developed during future, site-specific projects tiered to this plan. These plans may include actions for more than one zone designations and similar uses between adjacent zones may be considered. These future plans will be subject to additional compliance.

CONCERN

The NPS should provide more details about actions that would take place in each management zone in order to address long-term goals and future development pressure.

Representative Quote(s)

Corr ID: 38 Comment ID: 627207

“as a “zoning plan” this document should include more details of what is allowed in each area and how it relates to the longer-term vision. More details about the “zoning” should be presented. For instance, preservation of open space should trump any development pressure and the highest use of NPS land should be to return, restore, and protect the natural environment for the use of all including future generations.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Therefore, specific actions are not available at this time. Site-specific future projects will be tiered to this management plan and will identify detailed actions, which will be subject to separate compliance.

CONCERN

The NPS should provide a more specific description of the Special Use Zone, focusing on what the zone would become once the current lease for the RFK Stadium is up, because this zone should be returned to a more natural state at that time.

Representative Quote(s)

Corr ID: 38 Comment ID: 627210

“The Special Use Zone described in Alternate 1 is particularly vague in its description of purpose, and desired condition, experiences and activities. The lease on this land ends in 20 years, the timeline for this plan. Now is the time for NPS to decide a higher purpose for that land. AWS supports returning to natural area and reducing impervious surfaces as the goal and strategy for that zone. Much of that area is converted tidal wetland and restoration should be a top priority for the zone.”

Response

The NPS will determine specific uses of zones such as the Special Use Zone at a later time. Site-specific decisions about future uses of management zones will be tiered to this management plan and will be subject to separate compliance.

CONCERN

The NPS should consider zoning changes along the river, including adding a no-impact zone along the river shoreline because it would protect and restore natural resources. The NPS should also consider adding a maritime use zone because it would allow future infrastructure and facilities to support use of the river that may require special coordination and permitting with the District and the Army Corps of Engineers.

Representative Quote(s)

Corr ID: 95 Comment ID: 627347

“Create a “no-impact zone”.

In order to prevent pollution of the Anacostia and preserve the forest and natural scenery (NPS charge), a no-impact zone should be designated, extending from New York Avenue to Benning Road. Any activities occurring on either bank in this 3000 meter stretch must be buffered and invisible from the river by creating a suitable riparian area, reconnecting or creating flood plain, and establishing a naturalized shoreline.”

Corr ID: 84 Comment ID: 627323

“The provision of future opportunities for additional maritime use remains one of the most unique and exciting areas of value creation for the Anacostia River and the park. This potential can only be achieved through dedicated and prioritized planning collaboration between the NPS, DC and the Army Corps. My recommendation is to create a new Maritime Use Zone in the document, which includes the entire surface area of the river itself and dedicated areas of upland where the NPS would like to see future investments in infrastructure and facilities which support these uses.”

Response

As shown on figure 3, the selected alternative will designate much of the river shoreline as natural resource recreation zone, which will prioritize natural resource protection along the river. The selected alternative’s zoning configuration along the river will allow for interagency coordination and permitting efforts.

CONCERN

The NPS should include more lands in the Natural Resource Recreation Zone, including more of the land around the old Kenilworth recreation area and around Poplar Point, because the area needs more solitude spaces and preserved wildlife habitats.

Representative Quote(s)*Corr ID: 103 Comment ID: 613369*

“I would like to see the old Kenilworth Recreation area and beyond to remain as a Natural Resource Recreation Zone”

Corr ID: 39 Comment ID: 627229

“Of the action alternatives offered in this management plan, we prefer Alternative 4 because it preserves the greatest amount of wildlife habitat. However, we strongly recommend preservation of more of the existing important wildlife habitat at Poplar Point than is shown in any alternative.”

Response

The selected alternative maximizes use of the Kenilworth area for natural resource recreation, with a minimal amount of land designated Community Activity and Special Events around existing facilities, including Kenilworth Aquatic Gardens. Although the land around Poplar Point is designated the Organized Sport and Recreation Zone, wildlife habitat concerns will be accommodated, as the zone protects natural and water resources and ecological processes around concentrated areas of visitor use; the zone also permits ecosystem rehabilitation activities.

CONCERN

The NPS should not designate the area next to the golf course a natural resource recreation zone because it would hinder future programmatic use of the area. The current management of the golf course already addresses goals of the natural resource recreation zone, particularly with existing wetland buffers and proposed improvements to drainage and erosion control measures.

Representative Quote(s)*Corr ID: 53 Comment ID: 627260*

“In this context, it is our hope that the existing form and function of the Langston Golf Course is not adversely impacted by the policies adopted in the Management Plan. Further, we encourage the NPS to carefully consider maintaining the amount of space in the designated "Golf Course Zone," rather than designating this space as part of the "Natural Resource Recreation Zone." It is our belief that the existing and proposed golf course sufficiently address the goals for the Natural Resource Recreation Zone, thus eliminating the need for special designation which may hinder the programmatic uses of the land in the future. Specifically, as the draft Management Plan acknowledges, a wetland buffer has already been installed between Kingman Lake and the Langston Golf course greens and fairways, as part of the Kingman Lake restoration project. This was done in an effort to protect and allow public appreciation of the restoration. The buffer prevents chemical and sediment runoff from the golf course into Kingman Lake, and contains native wildflowers and a variety of native trees and shrubs. The site provides habitat for birds, butterflies, and native pollinators (Anacostia Management Plan/Environmental Assessment, 153). As such, it is seemingly serving many of the purposes of the proposed Natural Resource Recreation Zone, without the potential hindrances associated with the zone designation.

Lastly, as the draft plan also references, a series of improvements that are planned for the Langston Golf Course will have beneficial impacts on the wetlands, which may negate the need for a special Natural Resource zone surrounding the course. The installation of improved drainage and erosion control measures on the golf course would reduce the potential for stormwater runoff to result in soil erosion and conveyance of sediments to tributary streams, storm water drains, and the river (Anacostia Management Plan/Environmental Assessment, 72).”

Response

The natural resource recreation zone will be limited to the shoreline of the golf course and will not impede play or alter existing facilities. The designation of this zone along the shoreline is intended to ensure the golf course’s natural areas along the shoreline are maintained and preserved in the future.

CONCERN

The NPS should clarify how the placements of the management zones in each alternative were determined and what specific natural resource restoration actions would take place in the Natural Resource Recreation Zone. The NPS should undertake natural resources restoration and protection actions such as stream daylighting, restoration of tidal wetlands, and concentration of Natural Resource Recreation Zones in areas where streams and tributaries are currently piped through the park including Pope Branch, DuPont, Creek, and Stickfoot Branch.

Representative Quote(s)

Corr ID: 98 Comment ID: 627955

“Under Alternatives 3 and 4, there are several areas in the park south of the CSX Bridge that appear to be converted to Natural Resource Recreation Zones. DOEE requests that NPS clarify the criteria for the placement of these zones and requests a clarification on what other natural resource restoration actions beyond natural succession will be taken in these new Natural Resource Recreation Zones.

Some of these areas appear to coincide with former streams that are currently piped through the park. DOEE encourages daylighting of streams that are currently piped through the park, restoration of tidal wetlands at the mouth of daylighted streams, and concentration of new Natural Resource Recreation Zones near those areas. Daylighting should occur where Pope Branch, Fort DuPont Creek, Stickfoot Branch, and other small tributaries are currently piped through the park.”

Response

In accordance with NPS Management Policies 2006, all lands and waters within Anacostia Park are zoned to provide for user experience and resource protection. Management zoning is a required component of a management plan. Management zones have been delineated based on the park’s purpose, significance, management philosophy and objectives, and natural and cultural resources. Zoning assists managers in focusing on protecting natural processes and cultural heritage while accommodating compatible human uses. As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Therefore, specific natural resource restoration actions are not available at this time. Site-specific future projects will be tiered to this management plan and will identify detailed actions, which will be subject to separate compliance.

CONCERN

The NPS should widen and connect Natural Resource Recreation Zones and limit the amount of natural areas separated by large recreation areas in order to create wildlife corridors. These corridors could include along the Anacostia River edge and along the edge of I-295. The NPS could also improve wildlife habitat for pollinators by specifically designating “no mow” areas and pollinator gardens, particularly near Minnesota Ave SE.

Representative Quote(s)

Corr ID: 98 Comment ID: 627958

“Unconnected wildlife habitat areas are highly undesirable compared to well-connected habitat. DOEE strongly recommends that NPS make the establishment of wildlife corridors and connectivity a priority in the Anacostia Management Plan. The Plan has the potential to create a double wildlife corridor—one area at the river and one area bordering Highway 295.

Natural areas should be as contiguous as possible and the Plan should avoid separating natural resource areas with large recreational areas. DOEE recommends widening the Natural Resource Recreation Zones which lie adjacent to the Organized Sport and Recreation Zones, to act as wildlife corridors (see recreational “squares” on the map, page 123). The plan should create connectivity to the Fort Circle Parks for wildlife corridors. To increase habitat for pollinators, NPS should increase the areas designated as “no mow” areas and incorporate operations and maintenance written procedures and training for NPS

maintenance staff. DOEE recommends that NPS identify areas for new Pollinator Pathways, specifically pollinator gardens near Minnesota Avenue, SE.”

Response

The NPS has maximized wildlife habitat and habitat connectivity in the selected alternative while balancing these with the plan’s recreation and community use goals. The selected alternative designates large sections along the Anacostia River edge as Natural Resource Recreation Zone. Further site-specific habitat decisions can be accomplished in future projects that will be tiered to this management plan and will be subject to separate compliance.

CONCERN

The NPS should include bicycle and bike sharing facilities in the Organized Sport and Recreation Zones throughout the park and should consider adding a Bike Campus facility where the public can learn bicycle skills and safety.

Representative Quote(s)

Corr ID: 11 Comment ID: 612878

“Bikesharing needs to be included as an appropriate facility in, at least, the Organized Activity and Community Activity Zones.”

Corr ID: 46 Comment ID: 613047

“Bicycle facilities, like a Bike Campus (A safe, protected, vibrant reclaimed public space where users learn and practice bicycle riding, handling, and street skills with the aid of instructors or educational displays.), should be an appropriate use within the Organized Sports and Recreation Zone.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Therefore, specific facilities have not been determined. Specific facilities will be identified during future projects tiered to this management plan and will be subject to separate compliance. Bicycle use is permitted in many zones throughout the park and facilities can appropriately be considered at a later time.

CONCERN

Building, managing, and maintaining large recreational facilities and centers in the park is difficult and expensive for the NPS. Therefore, recreation should be tied more closely to the natural environmental features of the park rather than organized sports and recreation facilities. The NPS should work closely with the DC Department of Parks & Recreation to support recreational opportunities.

Representative Quote(s)

Corr ID: 38 Comment ID: 627216

“While the legislation establishing Anacostia Park called for recreational uses, that legislation happened prior to establishment of the DC DPR, it seems that DPR is ultimately responsible for providing recreational opportunities for DC residents. Any NPS designated recreation should be closely tied to the natural environmental features and not to sports that require large capital investments, management, and lighting. It will be very difficult and expensive for NPS to build, manage, and maintain high-tech playing fields and recreational centers. At a minimum the plan should recognize the role DPR plays in providing recreational facilities.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Therefore, specific recreational facilities have not been determined. Specific facilities will be identified during future projects tiered to this management

plan and appropriate consultation and coordination will be conducted to ensure the future actions are feasible. These future projects will be subject to separate compliance.

CONCERN

The plan's impact analysis was inadequate because it does not provide an adequate description of the existing conditions, including acreages of natural areas compared to recreation areas, in order to provide a proper analysis of the impacts (gain or loss of natural areas) of the action alternatives.

Representative Quote(s)

Corr ID: 39 Comment ID: 627226

"The Plan lacks specificity regarding the acreage of development impacts.

The draft Environmental Assessment (DEA) proposes four concepts for management of Anacostia Park: a required no action alternative and three alternatives for expanded and enhanced recreational and educational opportunities which can be termed, respectively, the 30 percent plan, the 45 percent plan and the 50 percent plan. These alternatives present a confusing picture to the average reader in that they project relative abundance of natural areas without obviously identifying a baseline from which losses can be compared. It is unclear what the net change in acreage of various ecological zones would be under each alternative. NPS needs to clarify this by providing detailed tables of natural area loss (or gain) to the extent possible under the as yet incomplete designs and plans for development. Where it does not know or cannot make an accurate estimate, this must be stated and explained. As we currently interpret the DEA, excepting the no action alternative all of the described options could result in a substantial loss of natural areas and specific natural habitats in Anacostia Park. Inasmuch as this represents the heart of the proposal, precision in describing such potential impacts is mandated in our opinion."

Response

Because no management zones currently exist within in the park, a comparison of acreages of the no-action alternative and of the action alternatives was unavailable for analysis. In addition, because this is a programmatic document, it does not describe how specific actions should be implemented. Therefore, specific changes in acreages of ecological areas cannot be determined for the alternatives. Future projects tied to this management plan will determine specific changes, if any, that will be implemented. These projects will be subject to separate compliance and compared to the existing conditions in a site-specific manner.

CONCERN

The plan's analysis did not properly address natural resource concerns, including habitat fragmentation that may result from zoning configurations, and the maps and descriptions of alternatives are too ambiguous to understand how habitat would be affected. The plan also should have identified high value natural resources, and those should have been a driving factor for the analysis.

Representative Quote(s)

Corr ID: 39 Comment ID: 627227

"The Plan does not identify habitat connectivity or assess the impacts of habitat fragmentation.

Visual examination of the maps used to illustrate land use and conversion for each of the alternatives demonstrates potentially crucial loss of connectivity of natural areas, with Alternative 4 being the least threatening outside of the no action alternative. These maps, however only provide a crude representation of habitat contiguity and connectivity, factors that can be critical in the protection of plant and animal populations. NPS should provide an analysis and discussion of what the effects of habitat fragmentation might be under each alternative."

Corr ID: 39 Comment ID: 627223

"The Plan underestimates natural resource values.

The park and environs have been identified as of special interest and concern for District wildlife. For example, some twenty or more kernels of high value for Species of Greatest Conservation Need (SGCN) are identified in DCGIS within the park, more than for any area of the city under single jurisdiction. The high value and relevance of Anacostia Park to the protection and preservation of the District's natural communities, their ecological relevance and their historical and social value for Washingtonians should be the paramount driver of NPS planning and management. We do not believe NPS has adequately addressed this in the DEA and needs to do so in a revised and substantially augmented document."

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. The maps in the EA are intended to provide an overview of how the zones will be laid out, but do not specify where actions will take place. Specific actions for development and natural resource restoration will be identified as appropriate during future projects tiered to this management plan. These future projects will be subject to separate compliance and impacts on park resources, which may include wildlife and wildlife habitat, will be analyzed as appropriate for these future actions.

CONCERN

The NPS should add more mitigation measures to the document because the mitigation measures included did not adequately address issues such as wildlife, socioeconomics, public education, agency cooperation, and social capital goals.

Representative Quote(s)

Corr ID: 39 Comment ID: 627228

"The proposals for mitigation measures are inadequate.

We applaud that mention is made of mitigating impacts to avoid the birth season of the Northern long-eared bat as well as resident breeding birds, but wonder why a more complete and comprehensive contingency plan has not been created. The mitigation of development impacts on wildlife is a growing and specialized field within wildlife management for which NPS should be a leader, using the best science and the best management practices. Planning processes and suggestions for multiple species exist, and a coordinated effort to appropriately time and enact displacement, removal or relocation activities for multiple species should be developed and implemented. Where development impacts might orphan or injure animals for whom care is needed, NPS should prepare memoranda of understanding with city agencies such as DOEE, institutions such as the National Zoo, and non-profit organizations such as City Wildlife for possible placement and care."

Corr ID: 84 Comment ID: 627325

"Page 32 – Mitigation Measures

This section is wholly focused on natural resource mitigation and ignores any discussion of socio-economic measures. This must change. Additional items which should be added include: public education and most importantly, the inclusion of job creation and hiring practices in maintenance, operations and construction activities in the park. Any future dollar spent inside of Anacostia Park must have specific social capital goals associated with these two mitigation strategies.

Public communications and job creation strategies are areas of ongoing engagement by the District of Columbia and the NPS would be well served to coordinate with the District and other potential partners to advance its procurement and partnership practices. This mitigation provision is an absolute core issue related to the future management of the park."

Response

The mitigation measures included in the plan were examples of measures that might be included in future, site-specific actions that tier from this plan and were not intended as a comprehensive list. To avoid or minimize environmental impacts in future planning efforts, the National Park Service would implement appropriate mitigation measures whenever feasible. The exact mitigation measures to be implemented would depend upon the final design and approval of the future projects that are tiered to this management plan.

CONCERN

The cumulative analysis needs improvement in several areas, including adding other local planning efforts to the list of other planning efforts considered, considering the impact of increased noise in the area, and considering the impact of increased visitation from the planned 11th Street Bridge Park.

Representative Quote(s)

Corr ID: 38 Comment ID: 627217

“Noise Attenuation-There is no mention of the increasing noise in the park from highways and particularly the military use of the river corridor as a flyway. This impact affects quality of life and visitor experiences as much as other issues.”

Corr ID: 44 Comment ID: 627237

“The 1,108 acres of parkland along the river’s banks have seen recent improvements with more opportunities for recreational access, including the Anacostia Riverwalk Trail, the Anacostia Water Trail, and the planned 11th Street Bridge Park. The Bridge Park will provide a connection between communities across the river and has the potential to directly impact use along the river. Starting in 2019, an estimated 800,000 visitors each year will visit the bridge park and we believe this facility and its impacts must be considered when planning the future management of Anacostia Park and the demands on its facilities and natural areas.”

Response

Because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Therefore, information needed to determine specific impacts, including cumulative impacts, is not available at this time. Specific actions and improvements will be identified during future projects tiered to this management plan and future compliance efforts for projects that tier to this management plan will address issues such as cumulative noise impacts as appropriate. Although the EA did address potential impacts of the 11th Street Bridge Park, the discussion has been modified in Attachment C: Environmental Assessment Errata to include the potential impacts of increased visitation from that project.

CONCERN

Because the park is so connected to other agencies, landowners, and communities, the NPS should coordinate with other organizations and agencies to assist with park operations and management, as well as to assist with the long-term goals of improving recreation opportunities, restoring natural areas, and cleaning up the Anacostia River. The park should also coordinate with adjacent land owners to address stormwater maintenance and efforts.

Representative Quote(s)

Corr ID: 43 Comment ID: 627236

“Moreover, there needs to be a better coordinated effort between all government agencies within DC to better optimize the use of sports facilities and green space serving DC youth. This includes coordination between DC government and federal agencies to ensure that current facilities are adequately maintained, that existing facilities are upgraded, and that these facilities are allocated fairly to both government and

non-government programs. Many existing facilities are not sufficiently utilized - - such facilities should be made available to partially alleviate this supply-demand imbalance.”

Corr ID: 40 Comment ID: 613014

“The NPS input needs to be part of a deliberately orchestrated process with other efforts to improve the Anacostia such as water quality, habitat, stormwater management, recreation, etc. that includes working with other organizations such as the District of Columbia, the Corps of Engineer, EPA, National Arboretum, Navy, etc.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions and improvements will be identified during future projects tiered to this management plan and appropriate consultation and coordination will be conducted. If appropriate, these future projects may include partnerships with local organizations or other parties to achieve project goals. These future projects will be subject to separate compliance, which may include an analysis of impacts on adjacent communities and landowners if appropriate.

CONCERN

Because the park is interconnected to other communities, the NPS should coordinate and partner with local recreation organizations who use or could use the park and who could help the NPS with recreation facility clean up and maintenance. These organizations would assist the NPS in achieving the goal of providing quality recreation facilities. The NPS should also coordinate with water users to understand their perspective, particularly regarding water access designs and locations.

Representative Quote(s)

Corr ID: 67 Comment ID: 613126

“A public private partnership, P3, with Washington Rugby Football Club would be a great solution and a great way to provide a quality ground for Washington Area Rugby ... The club would be willing to develop and maintain an area for youth and adult rugby to practice and play. In the North Field area of Anacostia Park, there is ample room clean up and develop a couple of quality sports fields.”

Corr ID: 50 Comment ID: 627241

“Please ensure that any access points, docks, trails, roads, are considered from the water user’s perspective. Additional public meetings on sites and designs should be shared with users. Rowers had to navigate large barges and machinery with floats for many months while the Anacostia River Trail (bike/pedestrian) was completed. This is understandable however, contractors left barriers and used potentially dangerous obstacles that should have been more wisely planned.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions and improvements will be identified during future projects tiered to this management plan and appropriate consultation and coordination will be conducted. If appropriate, these future projects may include partnerships with local organizations or other parties to achieve project goals. These future projects will be subject to separate compliance.

CONCERN

Because the Anacostia River connects to many different communities, including some in Maryland, the NPS should not only conduct public outreach in neighborhoods and communities adjacent to the park, but also in those outside the scope of the project that may be affected by actions related to the river. These efforts should also include youth outreach. The NPS should enhance the connections to these other lands

along the river through collaboration and coordination. The NPS should ensure the development would take place only in the park land and would not disrupt those living in the adjacent communities.

Representative Quote(s)

Corr ID: 50 Comment ID: 627240

“The NPS should consider this input and include in the planning process, the local jurisdictions that connect through the River even though they may be outside of the Plan’s scope. It is critical that the NPS work with the Maryland National Capital Park and Planning Commission to coordinate planning and preservation efforts.”

Corr ID: 88 Comment ID: 627333

“Policies and actions affecting the use and management of the Anacostia Park should reinforce the interdependence between the river, the parkland, and the community.

A robust, inclusive, and intentional community engagement policy is a critical component of developing, implementing, and sustaining an equitable vision and plan for the parkland. Community involvement should occur at multiple stages of the planning and implementation process.

Social isolation is a health risk. One of the parkland’s greatest assets is its ability to serve as a hub of community connections for people of all ages. Programming and physical design can fuel those connections. For example, the park can become the centerpiece for intergenerational programming for the arts, recreation, and education.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions and improvements will be identified during future projects tiered to this management plan and appropriate consultation and coordination will be conducted. These future projects will be subject to separate compliance and the impacts on local communities will be analyzed as appropriate. Future opportunities for public outreach will also be conducted as appropriate for these future compliance efforts.

CONCERN

The NPS should make specific changes or corrections to the maps in the document, including corrections to inaccurate information or missing information.

Representative Quote(s)

Corr ID: 6 Comment ID: 627178

“-shows "existing water taxi" at Burnham barrier location near south edge of "Kingman lake". I don't believe there is an existing water access in this location?

few other notes:

-dotted line for "Anacostia Riverwalk Trail - Proposed" for Kenilworth extension is existing now, not proposed. In fact the entire ART has dotted line suggesting "proposed" but should be solid line for "Existing".”

Corr ID: 63 Comment ID: 627289

“Figure 4 (Alternative 4) needs to be updated to label Poplar Point as Potential Land Transfer as noted in Alternatives 2 and 3.”

Response

The NPS addressed appropriate revisions to the maps in Attachment C: Environmental Assessment Errata.

CONCERN

Commenters requested the several additional planning efforts be added to Table 1. Local and Regional Planning Efforts.

Representative Quote(s)

Corr ID: 84 Comment ID: 627320

“Add reference to the Anacostia Waterfront Framework Plan under Comprehensive/Master Plans. Reference should read as follows: "Anacostia Waterfront Framework Plan (District of Columbia, 2003)". Note: This document was prepared by the District of Columbia Office of Planning in direct partnership with the National Park Service and the General Services Administration (primary signatories) under the terms of the Anacostia Waterfront Initiative Memorandum of Understanding signed by over a dozen federal agencies in March 2000. The document was formally adopted by NCPC and the Council of the District of Columbia in 2004.”

Corr ID: 99 Comment ID: 627988

*Include the following plans in the list of local planning efforts on Pages 6-7 under Comprehensive/Master Plans:

- District of Columbia Parks + Recreation Master Plan (2014)
- Buzzard Point Vision Framework and Design Guidance (2017-upcoming)
- Anacostia Waterfront Framework Plan (2003)
- Reservation 13 Hill East Waterfront Master Plan (2002)

Response

NPS addressed appropriate revisions to table 1 in Attachment C: Environmental Assessment Errata.

CONCERN

The NPS should make specific changes to the document text. These changes include editorial revisions as well as changes in language to clarify ambiguities.

Representative Quote(s)

Corr ID: 59 Comment ID: 627281

“Section 3 - The land transfer area at the former Kenilworth Landfill Site is not discussed. Please clarify the purpose of the land transfer, and whether it has any impact on the Park Management Plan Alternatives and their impacts.”

Corr ID: 98 Comment ID: 627987

“Correction to Pages 69-70: Please edit the following sentence to clarify its meaning: "A Metro subway tunnel passes beneath this area, which was disturbed by the construction of the tunnel.””

Response

Suggestions, corrections, and additions the NPS deemed appropriate for the management plan were addressed in Attachment C: Environmental Assessment Errata.

CONCERN

The plan should focus more on the protection and restoration of natural resources within the park. Although the park’s enabling legislation and past management has focused on meeting the recreation needs of residents, the park should now focus on protecting and restoring the natural resources in the park to counter the heavy development and loss of natural resources throughout the District. In addition, the park would be more adaptable to sea level rise and climate change with a more natural shoreline. The

park should implement specific natural resource protection measures, including those related to forest cover, stream daylighting, runoff, wetland delineation, native plants, and habitat connectivity.

Representative Quote(s)

Corr ID: 39 Comment ID: 627230

“The Anacostia Parks are already fairly diversified in providing recreational opportunities, while representing an invaluable natural resource that is only diminishing in the District. NPS should not emphasize such activities as roller skating and ultimate Frisbee (as but two examples of the recreational activities it suggests providing for) over the preservation of natural areas and the protection of the plants and animals therein. Any future management of Anacostia Park must focus first on there being no net loss of species diversity, abundance or distribution to the detriment of area plant and animal communities. NPS should have as its principal guidance and objective in this management planning process the absolute minimization of impacts to natural areas and their plants and animal communities. Where such impacts would be unavoidable it must present a credible case as to what their extent would be and why they must occur.”

Corr ID: 39 Comment ID: 617224

“The DEA identifies and describes the enabling legislation as the somewhat conflicting and contradictory mandates to meet park and recreation needs for District residents within the context of preventing pollution of major waterways and preservation of the forest and natural scenery. The relevant legislation was put in place over an approximately twenty-year span covering 1918 to 1938. In the years following, the District has seen progressive development of its lands at the expense of natural areas, as is common in many cities, and the loss of both species numbers and abundance. If anything, the prevention and preservation purposes of Anacostia Park have become more relevant and critical, combining with the sure knowledge gained in the interim that loss of natural areas and habitats in urban ecosystems is almost always permanent and not remediable. NPS should take the current environmental and ecological conditions in the District into account and balance its planning process and adherence to legislative intent accordingly.”

Corr ID: 63 Comment ID: 617286

"Connected, continuous wildlife habitat and naturalized areas can be achieved along the shorelines and throughout the park in conjunction with the creation of more active recreational uses for existing and future residents in park adjacent communities.

The Anacostia Park offers an opportunity to better adapt to rising sea levels and increased rain events associated with climate change through more natural treatment of the waterfront edge such as the creation of living shorelines where feasible.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions for the protection of natural resources, such as those identified by commenters, are not precluded by this plan, and will be identified as appropriate during future projects tiered to this management plan. These future projects will be subject to separate compliance and impacts on natural resources will be analyzed as appropriate.

CONCERN

The plan should address plant and animal species that are invasive or damaging to the park’s native natural resources. These include invasive plant species, invasive insect species, as well as the large population of resident Canada geese. Of particular concern are the ongoing impacts on trees in the riparian buffer along the river banks due to invasive species.

Representative Quote(s)**Corr ID: 56** **Comment ID: 627273**

“There is a need for improved invasive plant species management in the woodlands and scrublands adjacent to Hayes and Jay streets NE. Many of these areas appear to be infested with Kudzu.”

Corr ID: 40 **Comment ID: 613021**

“Such efforts need to include severe reduction of resident Canada geese as part of the Anacostia Watershed Management Plan with funding”

Corr ID: 50 **Comment ID: 627249**

“Restoration of the shorelines needs to be addressed. Ensure the replanting of trees and maintenance of forested areas. There is a notable decline of trees along the riparian buffer along the river, on the east and west sides due to emerald ash borer, disease and invasive weeds. Action must be taken to control invasive species such as Kudzu and English Ivy that are killing the trees. This will require a coordinated effort by various jurisdictions and the NPS is a key resource for critical maintenance of invasive species destroying the riparian area.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions for invasive species management will be identified as appropriate during future projects tiered to this management plan. These future projects will be subject to separate compliance. The resident Canada geese population are currently being addressed as well as into the future as described in the 2014 *Anacostia Park Wetlands and Resident Canada Goose Management Plan/Environmental Impact Statement*.

CONCERN

The plan should focus on the role of natural resources as a resource for local communities, including for education, food, health, and wellness. This role could include planting pollinator gardens that can serve as an educational space for residents to learn about wildlife and a community garden cared for by local gardening groups and organizations that would focus on growing and eating healthy food for the community.

Representative Quote(s)**Corr ID: 24** **Comment ID: 627195**

“The Service supports the wide range of facilities and activities described as suitable, especially community gardens and formal gardens. Several areas of the northern section of the park, near entrances 5 and 6 should be explored as potential garden sites. Using native pollinator plants in both the formal flower gardens and naturalized spaces can reduce overall maintenance costs and improve the wildlife values of the spaces. Community associations, gardening groups, religious and neighborhood organizations could utilize an "Anacostia Riverside Educational Garden" as a focal area for citizen involvement centered on growing and eating healthy food. Such a use is also consistent with the Sustainable DC Initiative goals for Nature, Food, and Health and Wellness.

In addition, the community vegetable garden could be integrated with a Pollinator Garden and Nature Playscape to encourage family activities focused on nature and environmental education. The Service has Pollinator <https://www.fws.gov/pollinators/> and Save the Monarch initiatives (<https://www.fws.gov/savethemonarch>) that promote plantings of milkweed and other plants hospitable to butterflies and other pollinators. The Service has been instrumental in developing nature play space examples and guidelines (<http://dnr2.maryland.gov/cin/Pages/NPS/index.aspx>) in Maryland and many of these spaces can be integrated easily into the public use design. Establishing a Pollinator Garden as part of the Anacostia Riverside Educational Garden, along with an educational kiosk would be a way to promote these initiatives in this vital urban park.

Incorporating both vegetable and pollinator gardens into the park plan creates spaces for student learning and action and helps local teachers fulfill the requirements of the District of Columbia's Environmental Literacy Plan. In addition, there are many active youth corps and youth groups in the area. Involving these groups in the planning of the specific details of the gardens and play space features will help support long term engagement in the maintenance and use of these features.

One of the most exciting potentials of this space is the opportunity it presents for demonstrating the interconnected nature of watershed protection, native habitat, community use and healthy food systems in one public space.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions for community uses of natural resources will be identified as appropriate during future projects tied to this management plan. These future projects will be subject to separate compliance.

CONCERN

The plan should address improving operations, maintenance, and management at the park, including managing the park more efficiently by focusing on natural lands because they are less resource-intensive to maintain than sports facilities; improving maintenance of park fields; removing or repairing the Anacostia seawall; and considering adjacent land uses.

Representative Quote(s)

Corr ID: 22 Comment ID: 612935

“while natural land does not come without cost to manage, it is significantly less resource-intensive to maintain”

Corr ID: 89 Comment ID: 613268

“consider the private land uses adjacent to the park to ensure that future capital investments and programs fit into the larger context of the waterfront”

Corr ID: 38 Comment ID: 627221

“While the Sea Wall is considered historic it is not listed. A portion of the seawall in an accessible area should be so designated and protected, managed, and the history programmed. The rest of the seawall is a liability for the NPS and should either be repaired or removed to allow natural or “living” shorelines to be installed.”

Response

This management plan is intended to provide guidance for management decisions for the next 15 to 20 years in order to improve operations and management of the park as a whole. However, as discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions for park operations, maintenance, and management will be identified as appropriate during future projects tied to this management plan. While future projects will be subject to separate compliance and the impacts on park resources will be analyzed, the NPS is aware of the issues with the seawall and is actively pursuing projects to evaluate and assess it to determine the appropriate management actions.

CONCERN

This plan should have a longer planning horizon of 25 to 30 years because the process for planning and implementing site-specific projects, including securing funding, can often take many years. A longer planning horizon will ensure that these site-specific plans remain relevant to the management plan to which they were tied.

Representative Quote**Corr ID: 38** **Comment ID: 627220**

“The plan only looks at the next 15-20 years. Is it possible to have a longer horizon, perhaps 25 to 30 years, in order to write the ensuing detailed plans and still be relevant to this document? It will take 15 years to complete the planning and capital improvement plans and get funding appropriated or captured from the private sector.”

Response

NPS Management Policies 2006 set guidelines that management plans should be reviewed about every 10-15 years to ensure they are up-to-date with current issues, although the time frame may be shorter or longer depending on the needs of each park. The NPS believes that the planning horizon of 15-20 years is appropriate for Anacostia Park because it will allow time to achieve the long-term goals of the park while ensuring the management plan is reviewed for relevancy as conditions and trends change over time. A review of the management plan would not necessarily preclude any tiered projects that have been planned but not implemented as long as the project continues to meet the purpose, need, and goals of the management plan.

CONCERN

The NPS should improve the maintenance and upkeep of park facilities, including sports fields, the golf course, trails and paths, and places where trash and graffiti collect.

Representative Quote(s)**Corr ID: 14** **Comment ID: 612892**

“It would be heartening to see fields like these renovated and better maintained”

Corr ID: 4 **Comment ID: 612823**

“support improving the existing boat ramp (which is usually full of trash and driftwood)”

Corr ID: 93 **Comment ID: 627869**

“Clean up tagging and graffiti on the Ethel Kennedy (EK) Bridge that leads into River Terrace Park. 6D's Commander Taylor mentioned to have the gang task force investigate tagging on the bridge, perimeter and community. New Signage at the trail at the trolley turnaround near the RFK parking lot identifies the bridge at Benning Road. Install signage with correct name, and affix proper symbols formally noting the importance of the bridge...such as Eagles or bridge paraphernalia.”

Corr ID: 93 **Comment ID: 627856**

“Clean and reroute the trash repository, sponsored by Anacostia Watershed that is being collected on the River Terrace bank.”

Response

The intent of all management zones and the management plan overall is to create an enhanced visitor experience through improved park facilities, natural resource areas, and recreational opportunities. However, as discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe details of specific maintenance actions or improvements to facilities. Maintenance and improvements to park amenities and facilities will be identified as appropriate during future projects tiered to this management plan. These future projects will be subject to separate compliance and the impacts on park resources will be analyzed.

CONCERN

The NPS should add specific amenities to the park for visitor safety and comfort, including more restrooms, more trash cans and benches, more picnic areas, more shaded areas, a water taxi landing, additional rules signage, vegetation screening along I-295, and additional lighting around fields and trails,

adding more or improving access to facilities within the park. The NPS should also add specific facilities for sports and recreation, such as equestrian facilities, exercise equipment, kayak/canoe rentals and storage, more kayak/canoe launches, and more quality play areas for children.

Representative Quote(s)

Corr ID: 97 Comment ID: 627364

“Consistent access to bathrooms, trash cans, benches and shade should be a priority.”

Corr ID: 93 Comment ID: 627869

“Affix appropriate signage and environmental friendly trash receptacles; dogs on leash, fines for not cleaning up pet waste, trash, illegal dumping, parking limitations (commercial buses and their passengers for out of town trips, and school buses blocking streets on Anacostia Ave. and streets adjacent to school, etc.).”

Corr ID: 60 Comment ID: 627802

“HW I295 is visible from a lot of areas in the Park bringing noise pollution, air pollution and unappealing industrial look. Trees can be planned in the area bordering I295 to 'hide' the highway, reduce the noise and improve the air quality. With I295 so much present some areas of the park do not feel like one is in a park/recreational area.”

Corr ID: 5 Comment ID: 622386

“The community needs more viable picnic areas so that all the trash and congestion will not be in one overcrowded area.”

Corr ID: 4 Comment ID: 612831

“open areas of the park closest to the river would benefit from having more tree cover- -not so much as to make the areas useless as athletic fields, but enough to provide more shade”

Corr ID: 101 Comment ID: 613343

“I’m not sure if there is a way to have equestrian activity”

Corr ID: 5 Comment ID: 622383

“The community needs more than (2) two neglected play areas for children; as is the case now.”

Corr ID: 93 Comment ID: 627864

“Install exercise stations throughout River Terrace Park and along the river walk.”

Response

The intent of all management zones and the management plan overall is to create an enhanced visitor experience through improved park facilities and amenities. However, as discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe details of potential future facilities and amenities. Further development of park amenities and facilities will be identified as appropriate during future projects tiered to this management plan. These future projects will be subject to separate compliance where the impacts on park resources will be analyzed.

CONCERN

Park facilities and areas for future development should be located away from sensitive natural areas and habitats. For example, the NPS Kenilworth Maintenance Yards operations should be consolidated with other similar facilities within the park, and the US Park Police facilities should not be relocated to the North Field area of the park because it is an important recreation area for park users.

Representative Quote(s)*Corr ID: 29 Comment ID: 612960*

“hope any space designated for development (including roads and other access routes) can be minimized, consolidated and sited away from sensitive habitats”

Corr ID: 56 Comment ID: 627272

“NPS Kenilworth Maintenance Yard operations should be consolidated with similar facilities at Kenilworth Aquatic Gardens, or at Anacostia Park in Southeast. The facility currently has a dilapidated appearance which is not compatible with the adjacent Anacostia Waterfront Trail and potential enhanced uses at Kenilworth Park South.”

Corr ID: 13 Comment ID: 627187

“Avoid use of the “North Field” for relocating US Park Police facilities (AOF, Aviation Section, etc., as has been proposed by NPS). Use of this important riverside open recreation area for major administrative uses is outrageous.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific locations of park facilities will be identified as appropriate during future projects tiered to this management plan. These future projects will be subject to separate compliance where the impacts on park resources will be analyzed.

CONCERN

The plan should clarify that the management zones in the land transfer areas represent the management zones that would apply if the transfers do not occur, rather than represent a prescriptive zoning assignment for the potential non-NPS landowner.

Representative Quote*Corr ID: 89 Comment ID: 613281*

“we want to confirm that the management zones proposed for transfer to the District of Columbia represent the NPS's approach to managing the areas if the transfers do not occur and will not be prescriptive after the land is transferred”

Response

The management zones established in potential land transfer areas represent the zones that would apply during NPS ownership of those areas; the NPS would have no jurisdiction over what type of management would occur under non-NPS ownership.

CONCERN

The NPS did not do enough public outreach to engage local residents and interested parties, including holding a public meeting or other forum for in-person contact between park staff and residents. In addition, the comment period was too brief, and the PEPC system is too limiting for those without access to the internet or who have other difficulties with written communication. The NPS should provide transparency as to how public feedback affects the NPS decision, including the content of stakeholder coordination for the EA scoping process.

Representative Quote(s)*Corr ID: 94 Comment ID: 613310*

“I was recently informed (about two weeks ago) that my community and I only had a short time to read (a document containing approximately 193 pages), decipher and choose a preferred option for the future of

our parklands. I believe that (what other residents and I feel) this late notice to the community is unacceptable and quite troubling.”

Corr ID: 41 Comment ID: 622390

“I am very concerned about the lack of outreach and engagement that National Park Service has with my community. At no time leading up to or during the comment period did any representatives of the National Park Service present these materials in my community despite the fact that we are amongst the most heavily impacted by any changes.”

Corr ID: 106 Comment ID: 627611

“I would also like to learn how the community comments submitted through this process affected the NPS decision on the way forward, that would be important transparency.”

Corr ID: 5 Comment ID: 622389

send out flyers in the surrounding community where comments can be directly gathered. If I can make any suggestion at all I suggest you stop using this platform for comments. This method is nearly guaranteed to exclude seniors (technological barriers), low-income "park goers" (technological barriers), and persons with educational restrictions (do you really expect someone with literacy issues to respond this way?!).

Response

The NPS followed standard practice as detailed in *Director's Order #75-A: Civic Engagement and Public Involvement* and *Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-making*. The NPS notified the public of the availability of the EA through a press release and through the park's Planning, Environment, and Public Comment (PEPC) website on February 1, 2017. Comments were accepted a variety of ways including on the PEPC website, via e-mail, via mail, and at the park headquarters. On March 21, 2017, the National Park Service was asked to extend the initial 45-day public comment period by an additional 12 days. The comment period extension allowed for more members of the public to both read through the document and to provide comments. Comments received are summarized in this report. When future specific projects are proposed that tier to this plan, additional outreach using various methods will be conducted, and communities will have opportunities to express their concerns and engage in the process.

CONCERN

The plan did not analyze impacts related to climate change, particularly sea level rise; the NPS should consider maintenance practices that would increase the adaptability of the park.

Representative Quote(s)

Corr ID: 84 Comment ID: 627326

“The document is silent on environmental and atmospheric trends associated with climate change. If the document is to serve the NPS for 20 years, then some discussion is certainly in order and at the very least should be acknowledged in the assumptions for flooding and inundation in 2037. The assumptions associated with sea-level rise and precipitation should be addressed conceptually and any specific risk factors should at least be identified. These issues represent another opportunity to more closely work with the District, whose Department of Energy and Environment has recently performed extensive coordination with the NPS and other federal agencies on these matters.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe specific actions to be implemented. Therefore, information needed to determine specific impacts related to climate change was unavailable for this plan. Specific development actions will be identified during future projects tiered to this management plan, and the way in which environmental and

atmospheric trends are affected by or themselves affect park resources will be analyzed in in future compliance documents to the extent it applies.

CONCERN

Wildlife and wildlife resources should not have been dismissed from further analysis because there are several Species of Greatest Conservation Need and other important species with habitat in the park; future development could result in adverse impacts to these species, and the plan did not properly address them.

Representative Quote(s)

Corr ID: 51 Comment ID: 627257

“We are deeply concerned by the scope of the Plan and note that important issues were not captured in its assessment. First and foremost, we are dismayed by the lack of a good-faith, science-based assessment of wildlife communities within the Park and the Plan’s likely impacts thereon. As described below, many Species of Greatest Conservation Need as outlined in the District’s Wildlife Action Plan are found in the Park and would be affected by activities outlined in the Plan. The outright dismissal of the Plan’s impacts to wildlife without any supporting assessment or evaluation is a clear oversight in this planning effort, which we find very troubling. In addition, the heavy focus on development for recreation is of concern.”

Corr ID: 39 Comment ID: 627225

“The DEA does not adequately identify the Anacostia Park’s floral and faunal resources, nor project development impacts and potential long-term and cumulative impacts of habitat destruction, alternation or modification. In fact, impact on "Wildlife and Wildlife Resources" is dismissed from further analysis in the very first section of this plan ("Purpose and Need"), with statements that seem simplistic and may not be borne out by science, such as “Wildlife would be expected to reoccupy the project area following construction.” (This is not necessarily true for species such as the American Woodcock, a declining species whose only documented breeding habitat in the District is the Kenilworth grassland; for fragile populations of reptiles and amphibians; or for forest interior dwelling species [FIDS] such as the Wood Thrush that require large areas of uninterrupted woodland to reproduce. As a rule-of-thumb, development will destroy wildlife habitat for a distance of 25 meters from the entire perimeter of any disturbance, including developments that may appear benign, such as walking trails, bike paths, or boardwalks.)”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe specific actions to be implemented. Therefore, information needed to determine specific impacts on wildlife and wildlife resources was unavailable for this plan. Specific development actions will be identified during future projects tiered to this management plan, and impacts on park resources, which may include wildlife and wildlife resources if appropriate, will be analyzed in in future compliance documents.

CONCERN

The impact topics related to water quality and water resources should not have been dismissed because of the ongoing progress toward improving the water quality in the Anacostia River; impacts from stormwater runoff could result in impacts on water resources.

Representative Quote(s)

Corr ID: 38 Comment ID: 627209

“Water Resources has been dismissed as not relative to this programmatic document but back to comment 1 above, what are the allowed uses in each zone and doesn’t restoring water quality due to existing features qualify for discussion in the allowable practices in a particular zone?”

Corr ID: 66 Comment ID: 627292

“The Draft EA dismissed water quality impacts from consideration, a puzzling omission given the intense focus on water quality in the Anacostia River in past years and the progress towards success in that goal. The Park, its Management Plan, and subsequent plans for individual components or buildings must all hold water quality in the forefront as an essential goal to be achieved, not just an impact to be mitigated.”

Response

Because this management plan is a programmatic document, it does not describe specific actions to be implemented. Therefore, information needed to determine specific impacts on water quality and water resources was unavailable for this plan. Specific development actions will be identified during future projects tiered to this management plan, and impacts on park resources, which may include water quality and water resources if appropriate, will be analyzed in future compliance documents.

CONCERN

The NPS did not adequately address community environmental justice concerns. Environmental justice should not have been dismissed from further analysis because public outreach for the EA comment period was limiting and because the park has long had insufficient maintenance and capital budgets, which has resulted in a negative impact on the surrounding communities. The NPS should also undertake further demographic study of park users and address future funding concerns.

Representative Quote(s)

Corr ID: 84 Comment ID: 627321

“The park has long been managed with brutally insufficient maintenance and capital budgets which cumulatively over time have represented a negative impact on surrounding communities. The document should clearly state that. The necessary funds to maintain the park have not been historically allocated in amounts which adequately compare to other urban parks in our city, our region or in our nation. What may be described as a maintenance backlog on a year-to-year basis, it has cumulatively resulted in a negative impact on surrounding communities on a decade-to-decade basis. Since the timeframe for the document is 20 years, it is entire appropriate to candidly address this reality. This is an issue of environmental justice that may not be defined in any one discrete environmental impact on surrounding communities, but certainly is within the nexus of government actions (or inactions) related to the regional concentration of poverty within the communities immediately adjacent to the park.

Beyond the issue of baseline funding of maintenance budgets and sources of funding for future capital investments is the underlying issue of planning and design excellence. For too many years the park has been denigrated as a mediocre collection of ad hoc recreational facilities. This was most certainly not Olmsted's vision for the park as conceptualized in the Senate Park Commission Plan of 1901. The 2000 AWI MOU clearly elevates the issue of design excellence for all lands along the Anacostia, including Anacostia Park, and the draft GMP should clearly and candidly acknowledge this. Yes, these issues are sobering, but it is the responsibility of the NPS to be candid and objective in this milestone document.”

Corr ID: 50 Comment ID: 627245

“ENVIRONMENTAL JUSTICE

One month for public comments is very short especially when scoping such a comprehensive plan. What kind of communication efforts were used to include the communities in the scoping process? We see a lot of people fishing in the Anacostia. Are there signs in English and Spanish that advise that fish should not be eaten?

Was a demographic study made of the fisherman, hunters, sport-persons using the river trail? The completion of the Anacostia Riverwalk Trail for bicyclists and pedestrians brings urban and suburban citizens to different parts of the Anacostia Park system. Outreach channels are greatly increased. Commuters use the trail network through NPS land. Suggest the NPS describe the diversity, demographics, resident and non-resident, seasonal, local users of the river trail and park land.

Documentation of the study to better understand the users and then ongoing communications should continue during the plan implementation.”

Response

As discussed on pages 11 and 12 of the EA, the NPS dismissed environmental justice from further analysis because of the following reasons:

- The park staff and planning team solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- Implementation of the proposed action would not result in any identifiable adverse human health or other effects. Therefore, there would be no direct or indirect adverse impacts on any minority or low-income population.
- The impacts associated with implementation of the proposed action would not disproportionately affect any minority or low-income population or community.
- Implementation of the proposed action would not result in any identified effects that would be specific to any minority or low-income community.

In addition, because this is a programmatic document, no specific actions have been identified for implementation in the park. Therefore, information needed to determine specific impacts on environmental justice is unavailable at this time. Specific actions would be identified in site-specific future projects tiered to this management plan. Those projects will be subject to separate compliance and impacts on environmental justice will be analyzed if appropriate.

CONCERN

The NPS should prioritize sports and recreation facilities in the park over other uses. The existing sports facilities in the park should be retained or expanded, including facilities that are specifically accessible for youth and would be valuable resources for the communities. Sports facility expansions and additions could include improving the pool, adding splash parks, adding more recreation space at the Aquatic Gardens, and improving and maintaining the neglected tennis courts.

Representative Quote(s)

Corr ID: 43 Comment ID: 627233

“Today, there is simply not enough available and accessible outdoor athletic facilities in DC to accommodate growing demand for youth sports. As the number of younger players engaging in organized sports continues to grow, sports programs serving DC youth will continue to be challenged in providing safe, accessible, and high-quality outdoor spaces for use for sports and recreation, along with helping in the fight against childhood obesity. And this applies equally to adult sports programs and activities as well.”

Corr ID: 8 Comment ID: 629336

“Personally, I use the Langston Golf Course and the recreation areas around the Anacostia field house (tennis courts and walk/bike path). I would like to see a plan that includes enhancing these activities. The tennis courts are highly neglected and the golf course is not on par with the East Potomac Center.”

Corr ID: 99 Comment ID: 627994

“-Anacostia Park has been identified as an "NPS Parkland of Interest" for meeting the District of Columbia's Active Recreation needs as there is a dearth of active park space in other parts of the city.

-The Recreation Center on Anacostia Park land (managed by DPR) is substandard in terms of size/space and condition.

-The Outdoor Pool at the Recreation Center is an asset which could be emphasized and improved; splash parks in the vicinity could complement this water feature.

-Anacostia Park is identified as an opportunity site for additional environmental programs through strategic partnerships, and direct, low-barrier river access (such as kayaks/canoes, fishing, etc.)

-The Kenilworth Park/Aquatic Gardens are identified as in need of additional recreation center space.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions regarding sports and recreation facilities in the park will be identified as appropriate during future projects tied to this management plan. These future projects will be subject to separate compliance, and their impacts on park resources will be analyzed.

CONCERN

The plan should address bicycling in all management zones, including permitting bicycle access to the park on non-paved surfaces, particularly in the Twining area; adding separate bicycle paths within the park to separate cyclists from motor vehicles and pedestrians; and including Capital Bikeshare hubs.

Representative Quote(s)

Corr ID: 73 Comment ID: 613193

“cycling solutions should be separated from car traffic and preferably not be the same path as people walking and running”

Corr ID: 97 Comment ID: 627367

“● WABA strongly supports the use of bicycles being included in each of the six management zones. Biking should be considered an appropriate use of all zones within the park.

- Capital Bikeshare should be included in the Organized Sports and Recreation Zone.
- Bicycle facilities, like a Bike Campus, should be an appropriate use within the Organized Sports and Recreation Zone.
- Bicycle facilities and use should be prioritized in the Natural Resource Recreation, Community Activities and Special Events, and Organized Sport and Recreation Zones.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions regarding bicycle uses in the park will be identified as appropriate during future projects tied to this management plan. These future projects will be subject to separate compliance.

CONCERN

The NPS should improve access to the park from the surrounding neighborhoods and communities, including access by pedestrians and bicyclists connecting to the Anacostia River Trail, because access to the park is important for park access and also for access to the rest of the District. Paved trails should be open for use at all times because many residents use them as transportation routes. The NPS should create universally accessible pedestrian pathways to the park from neighborhood activity centers such as schools and housing developments. The NPS should also address the balance of access, as too many access points are consolidated near the National Arboretum and not enough exist in the rest of the park.

Representative Quote(s)**Corr ID: 97 Comment ID: 627365**

“Keeping paved trails open for use at all times of day is incredibly important- for many residents in the region, trails are transportation infrastructure, and the hours of operation should be the same as a roadway.”

Corr ID: 79 Comment ID: 613238

“would also like the space to connect via bicycle and walking trails to Anacostia River Walk trail”

Corr ID: 58 Comment ID: 613078

“future connection to the Anacostia River Trail to Fort Lincoln as well as direct connection of access to the proposed area will lend itself to increased functionality, community connectivity and sponsorship funding opportunities to create appropriate recreational facilities that will benefit all users.”

Corr ID: 56 Comment ID: 627270

“Access to Kenilworth Park South is especially important to the Mayfair, Paradise and Parkside Communities. Currently the community is isolated from these parks. Entries to the park should be installed at the north end of Neval Thomas, on Hayes Street at one or more of the old trail entrances, and on Jay Street. The current entrance located on Hayes Street has been neglected for many years and is completely overgrown. It should be properly restored to create an inviting, accessible entrance to this important community resource and amenity for current and future residents.”

Corr ID: 63 Comment ID: 627285

“Additional and improved access points to the park were identified as a planning concern on Page 8 and should be included at specific locations in Alternatives 2-4 and evaluated for impacts. The District of Columbia Parks Recreation Master Plan concluded that while Anacostia Park provides a high capacity level of service (acreage per capita) for surrounding residents, access to the park is limited and requires improvements. Opportunities exist for enhanced access in several locations including but not limited to the U.S. National Arboretum, Kenilworth Park and Aquatic Gardens, and Poplar Point/Howard Road.”

Response

Because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions regarding access to the park will be identified as appropriate during future projects tied to this management plan. The NPS may consider additional points of access and universally accessible routes into the park if appropriate and feasible. These future projects will be subject to separate compliance, and their impacts on park resources will be analyzed.

CONCERN

The NPS should expand and/or enhance its interpretation of the park’s history, environmental resources, recreational opportunities, and safety. Suggested themes related to history and culture include history and culture of Indian tribes in the area, impacts of European colonists, and historically significant events that occurred in the park such as the Bonus Army. For environmental and nature-based interpretation, the NPS could install signage along paths identifying native species of plants and wildlife and providing information about sustainable landscaping. Suggestions related to recreation and safety included educational river tours and activities teaching children and adults water safety. The plan should include a balanced focus on recreation, education, and nature. Partnerships with local organizations could help develop and conduct interpretive and educational programming.

Representative Quote(s)**Corr ID: 7** **Comment ID: 612859**

“Develop an Interpretive Plan that encompasses the broader themes of the Anacostia corridor, including the Native Peoples, the impacts of Europeans on the environment, historically significant events that occurred in the park”

Corr ID: 98 **Comment ID: 627984**

“Given the National Park Service's commitment to environmental sustainability and public education, we would recommend exploration of opportunities to showcase the environmental improvements made to and exhibited throughout Anacostia Park. For example, educational signage along bike paths and walkways can help visitors identify native plant and bird species. Large planted areas near Organized Sport and Recreation Zones should feature native plants and encourage residents to learn about sustainable landscaping practices and how to install rain gardens at their homes.”

Corr ID: 130 **Comment ID: 628210**

“Learning about water safety and how to co-exist with nature along with special night-time community events, like a bonfire and/or camping and a nature center would be great opportunities, not just alternatives.”

Corr ID: 88 **Comment ID: 627340**

“The parkland is a vast educational resource that can be leveraged and creatively accessed by multiple community partners. For example, the Anacostia Community Museum runs a curriculum-based Citizen Science Program. The goal of the program is to cultivate environmental knowledge and awareness through engagement in STEM (science, technology, engineering, and math) activities. It also promotes civic engagement, as students work on locally focused projects exploring native plant species, the Anacostia River, and watershed conservation.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. The NPS may identify specific plans for interpretation and educational programming during future projects tiered to this management plan. These future plans will be subject to separate compliance, including consultation and coordination, and their impacts on park resources will be analyzed. Within the last year, the park has launched a number of initiatives to enhance natural and cultural resource interpretation. This includes monthly bike tours along the river; Bonus Army, Captain John Smith exploration, flora and fauna of the park, and the War of 1812 interpretation programs; and stationing a ranger at the Urban Treehouse to connect to youth and summer camp programs throughout the summer. Future plans include interpretation waysides along the Anacostia Riverwalk Trail, to highlight the history and natural resources of the park.

CONCERN

Field conditions are consistently poor and contain safety hazards such as manhole covers and large rocks. The Anacostia River is polluted with trash and the health and safety of river users should be an integral part of the management plan. These issues should be addressed because the existing health and safety issues limit the public's ability to fully enjoy the park.

Representative Quote(s)**Corr ID: 15** **Comment ID: 612894**

“field conditions have been consistently poor with manholes, rocks, rebar, concrete, gravel, etc. scattered all across the area, leading to safety hazards for people trying to use the fields for sports”

Corr ID: 50 Comment ID: 627254

“Pollution as mentioned in the EA alternatives focuses on stormwater pollution and light pollution. The NPS should address the tons of debris (plastic bottles, trash, tires, etc.) floating in the River. This unsightly trash collects under bridges, along the shores and docks; and floats back and forth on the River causing potential danger to users. Propose that the Army Corps of Engineers address water trash collection, such as using a skimmer north of the CSX Railroad Bridge and Kingman Island. Resources need to be coordinated and committed for maintenance along the river trail flowing thru the jurisdictions. For example the extremely low CSX Bridge collects tons of trash and trees that block the flow and access to the river. The Anacostia River Trail for pedestrians and bicyclists has a raised route under New York Avenue which collects trash depending on the tides. The plan needs to address floating trash collection more effectively.”

Corr ID: 88 Comment ID: 627336

“Safety and security concerns inhibit local residents from taking full advantage of the parkland and can be addressed through the design, maintenance, and programming of the parkland developed in consultation with community residents and park users.”

Response

This management plan includes broad guidance for future park management and improvements to facilities. However, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions to improve facilities will be identified during future projects tiered to this management plan, and improvements to public health and safety will be included as necessary. These future projects will be subject to separate compliance, and their impacts on park resources will be analyzed. The park and its partners conduct numerous park clean-up days throughout the year, and hundreds of bags of trash are removed from the river each year. There are also several trash traps along the small streams that empty into the Anacostia River, collecting and removing trash throughout the year. In addition to these efforts, the park also focuses on community outreach, and educating the public on the significance of littering and how it harms the environment.

CONCERN

The NPS should address security of park users and area residents in this management plan because new facilities and increased public use may require additional Park Police to provide security.

Representative Quote(s)**Corr ID: 38 Comment ID: 627219**

“Security-While perhaps beyond the scope of this plan, security is paramount in considerations to increasing public access. New bike trails and walking trails have to be weighed with the ability of the Park Police to provide security in a manner sufficient to protect the public and NPS resources.”

Corr ID: 124 Comment ID: 628030

“Security: Increased access and a cleaner, healthier Anacostia River mean more people will visit Anacostia Park and Kenilworth Aquatic Gardens. We would like for them all to have wonderful experiences. In part this can be achieved by increasing the presence of uniformed NPS personnel and law enforcement both on the Anacostia River Trail and in the parks themselves. Budget and staffing levels understood but notwithstanding, Anacostia Park planning must include strategies for providing for public safety, but in ways that are compatible with the natural beauty of the area.”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions will be identified during future projects tiered to this management plan. These future projects will be subject to separate compliance and their impacts on park resources will be analyzed. The topic of public health and safety will be addressed

in these future plans as appropriate. Currently, the United States Park Police has its headquarters at Anacostia Park, and Park Police officers patrol diligently to ensure the safety and security of all visitors. Alongside law enforcement efforts, the public plays a big role in notification, and the Park Police consistently ask “if you see something, say something.” In addition, the park is working on several efforts to enhance safety, including fixing lighting along Anacostia Drive, safety along the Anacostia Riverwalk Trail, and an increased park ranger presence, particularly during the summer.

CONCERN

The NPS should improve the health and safety of park users through improved facilities and changes to park management. The NPS should prohibit public grills for private cookouts to limit trash, create community gardens in the park for residents increase nutrition and food literacy, install emergency phones throughout the park, install safety lighting along park roads, install safety lighting along bridges for river users to know which spans are safe for passage, close the park at dusk, and deter drivers from cutting through the park during rush hour.

Representative Quote(s)

Corr ID: 79 Comment ID: 613241

“I do not want public grills or for the outdoor space to be reservable for private cookouts due to concern for trash and pollution.”

Corr ID: 88 Comment ID: 627338

“Using the parkland to expand the breadth and scale of community gardens in Wards 7 and 8 will enhance food access, increase nutrition and food literacy, provide student learning opportunities, and spark an ongoing dialogue on public health.”

Corr ID: 93 Comment ID: 627865

“• Strategically install emergency phone posts.

- Install appropriate safety lighting along Anacostia Avenue.
- Advocate River Terrace Park continues to close at dusk.”

Corr ID: 73 Comment ID: 613198

“recommend deterring vehicle traffic that uses the park as a shortcut during rush hour”

Response

As discussed on page 1 of the EA, because this management plan is a programmatic document, it does not describe how specific actions should be implemented. Specific actions will be identified during future projects tiered to this management plan, and improvements to public safety will be addressed as necessary. These future projects will be subject to separate compliance, and their impacts on park resources will be analyzed. Currently, the United States Park Police has its headquarters at Anacostia Park, and Park Police officers patrol diligently to ensure the safety and security of all visitors. Alongside law enforcement efforts, the public plays a big role in notification, and the Park Police consistently ask “if you see something, say something.” In addition, the park is working on several efforts to enhance safety, including fixing lighting along Anacostia Drive, safety along the Anacostia Riverwalk Trail, and an increased park ranger presence, particularly during the summer.

ATTACHMENT C: ENVIRONMENTAL ASSESSMENT ERRATA

The following changes have been made to the *Anacostia Park Management Plan Environmental Assessment* (February 2017) *Finding of No Significant Impact* (FONSI) to correct minor statements of fact and update information. These changes are minor corrections and updates and do not alter the overall impact analysis, nor the decision of the National Park Service to implement its preferred alternative as presented in the EA. Unless otherwise noted, additions to the text are identified by underlines, and deletions are marked by strikeouts.

TABLE 1. LOCAL AND REGIONAL PLANNING EFFORTS, Page 6

In Table 1. Local and Regional Planning Efforts, the following revision should be made under Comprehensive/Master Plans:

- Anacostia Kingfisher Watertrail Master Plan and Public Access Project

The following plans should be added to table 1 under the heading “Comprehensive/Master Plans:”

- DC Pedestrian Master Plan
- MoveDC Plan
- Boathouse Row Planning Study
- District of Columbia Parks & Recreation Master Plan (2014)
- Anacostia Waterfront Framework Plan (2003)
- Master Plan for Reservation 13 - Hill East Waterfront (2003)
- Buzzard Point Vision Framework and Design Guidance (2017-upcoming)

The following plans should be included in table 1 under the heading “Other Plans:”

- Events DC RFK Campus <http://www.rfkcampusfuture.com/home> (2017)
- Kingman and Heritage Islands Planning and Feasibility Study (2017)
- District of Columbia Wildlife Action Plan (2015)
- Sustainable DC Plan
- Climate of Opportunity: A Climate Action Plan for the District of Columbia (2016)
- Anacostia Sediment Project
- Wetland Conservation Plan
- DDOE and DDOT District of Columbia Urban Tree Canopy Plan (2013)
- DOEE and the Urban Forestry Advisory Council, Canopy 3000 (2016)

RARE, THREATENED, AND ENDANGERED SPECIES, Page 10

During the scoping period, the National Park Service consulted with the US Fish and Wildlife Service (USFWS) to identify any potential rare, threatened, and endangered species that may occur within the project area. In a letter dated May 8, 2013, the US Fish and Wildlife Service stated that except for the occasional transient individual or migratory bird, there are no federally listed or proposed endangered or threatened species, or critical ~~habits~~ habitats occurring in the park area.

SPECIAL USE ZONE, Page 19

Purpose: The special permitted lands zone includes RFK Stadium and its accessory parking lots, which were authorized by Public Law 85-300 on September 7, 1957. As a result of Public Law 99-581 (October 29, 1986) the stadium is owned by Washington, DC, the lands are leased to Washington, DC, by the

National Park Service, and facilities are managed by EventsDC (formerly the DC Sports and Entertainment Commission). Other facilities authorized within the special use zone include the ~~Environmental~~ Earth Conservation Corps building and parcel and the Northeast Boundary Swirl facility.

FIGURE 3, Page 25

On page 25, in Figure 3, the map shows the North Field with three delineated ballfields and mistakenly zoned as “Organized Sport and Recreation Zone.” There are no current or planned ball fields at this location and the North Field in its entirety was intended to be classified as “Community Activities and Special Events Zone.” See attached.

COMPARISON OF MANAGEMENT ZONES UNDER ACTION ALTERNATIVES, Page 31

Acreage correction were also made Table 2, on page 31 These corrections affect about 1.4 percent of the study area and do not affect the overall impact analysis of the selected alternative as described in Chapter 3 of the EA.

TABLE 2. COMPARISON OF MANAGEMENT ZONES UNDER ACTION ALTERNATIVES

Zone	Alternative 2:	Alternative 3:	Alternative 4:
Natural resource recreation zone	352 acres	536 acres	620 acres
Golf course zone	167 acres	128 acres	128 acres
Organized sport and recreation zone	212 acres	133 acres 117 acres	67 acres
Community activities and special events zone	204 acres	139 acres 155 acres	122 acres
Park administration/ operations zone	6 acres	5 acres	4 acres
Special use zone	152 acres	152 acres	152 acres
Other lands	15 acres	15 acres	15 acres
Total Park area	1,108 acres	1,108 acres	1,108 acres

The following footnote should be added to Table 2. Comparison of Management Zones under Action Alternatives:

Note: Because the potential land transfers are not part of this management plan and may not occur prior to implementation of this management plan, these acreages represent the park size as it would be if the land transfers do not take place.

KENILWORTH PARK LANDFILL SITE, Page 46

The following text should be added after the last paragraph on page 46:

Section 344 of Public Law 108-335, approved October 18, 2004, directs the National Park Service to transfer administrative jurisdiction of Kenilworth North in Anacostia Park, US Reservation 343G, to the District of Columbia. The National Park Service completed the survey of the area to be transferred, completed development of the draft Declaration of Covenants, and has requested that a Transfer of Jurisdiction plat be prepared by the District’s Surveyor’s Office. However, site transfer has been put on hold due to the District’s concerns about site remediation responsibilities.

POPLAR POINT WETLAND, Pages 69–70

The wetland at Poplar Point is an emergent wetland located south of the existing park headquarters building and along the southern shoreline of the Anacostia River. The Poplar Point Wetland is comprised of two

separate wetland areas located immediately adjacent to each other. This wetland has a levee on the east and is located at a former facility that was operated by the Architect of the Capitol. ~~A Metro subway tunnel passes beneath this area, which was disturbed by the construction of the tunnel.~~ This wetland was previously disturbed by the construction of the Metro subway tunnel that passes underneath this area. The wetland is isolated from the Anacostia River and its hydrology appears to be sustained by groundwater and precipitation.

VISITOR USE AND EXPERIENCE, IMPACTS OF ALTERNATIVE 1: NO ACTION, CUMULATIVE IMPACTS, Page 158

Adverse impacts have or may result from development, management, and transportation improvement projects. For example, implementation of the management plan for wetlands and resident Canada geese could result in adverse impacts on visitor use and experience because some visitors like the geese and would prefer to continue to experience the existing number of geese in the park. Additionally, the scare and harassment techniques may include visual deterrents that may be aesthetically unappealing to some visitors. When completed, the new stadium for the DC United soccer team could result in adverse impacts on visitor use and experience for visitors to the Buzzard Point area of the park. Before, during, and after soccer games at the stadium, visitors to the park may experience increased traffic in the area, which may impact the experience of getting to or exiting from the park in Buzzard Point. If the 11th Street Bridge Park is built, high visitation levels there could potentially lead to periods of crowding in the parts of Anacostia Park adjacent to the Bridge Park, particularly at peak times. Ongoing implementation of the DC Water Clean Rivers Project has resulted and would result in adverse impacts due to construction activities that have and will close some areas and reroute portions of the Anacostia Riverwalk Trail. However, these impacts would be temporary. Once operational, there would be some odor-producing releases when the tunnel would be filled during large storm events, which may detract from the visitor experience or discourage use of the affected area. However, these impacts would be temporary and odor control measures would be effective during dry conditions. The transfer of land and subsequent redevelopment of Poplar Point could result in adverse impacts if visitors are no longer able to access and use the land they desire to use at Poplar Point as they currently are able. The various transportation improvement projects adjacent to the park could result in adverse impacts related to construction activities, and may include visual and noise impacts due to use of machinery. Investigation or remediation of contaminated sites has required and would require closure of certain areas of the park to the public due to safety concerns, which has and may result in adverse impacts on visitor use and experience if visitors cannot access all areas of the park.

FIGURES 1–18

The following changes apply to all figures in the EA:

- The symbols for “Water Taxi – Existing” should be removed at Buzzard Point and south of RFK Stadium from all figures.
- The dotted lines in the Kenilworth Park area representing “Anacostia Riverwalk Trail – Proposed” should be revised to the dashed lines representing “Anacostia Riverwalk Trail – Existing” on all figures.
- Green dashed arrows identified as “Enhanced Park Connectivity” should be removed from all figures.

FIGURES 4, 10, 14, AND 18

- The label, “Potential Land Transfer” should be added to the Poplar Point area.

FIGURES 6 AND 11

The symbol and label for “Captain John Smith Trail Access – Proposed” should be removed from the legend.

ATTACHMENT D: MITIGATION MEASURES

The following is a list of mitigation measures that may be instituted as actions are taken to implement the selected alternative.

- Mitigate and minimize potential impacts on natural and cultural resources during construction by ensuring designs and plans are compatible with cultural and natural resources and the character of the site, instructing contractors on the sensitivity of the general environment, and monitoring adherence to plans. Corridors for construction vehicle movement will be established and defined on the ground. Staging of construction equipment will be restricted to the road corridor, parking lots, and other identified previously disturbed areas to avoid impacts on natural and cultural resources.
- Implement standard noise abatement measures during construction. Standard noise abatement measures may include the following elements: a schedule that minimizes impacts on adjacent noise-sensitive uses, the use of the best available noise control techniques wherever feasible, the use of hydraulically or electrically powered impact tools when feasible, and location of temporary noise sources as far from sensitive uses as possible.
- Minimize soil erosion by limiting the time that soil is left exposed and by applying other erosion control measures, such as erosion matting, silt fencing, and sedimentation basins in construction areas to reduce erosion, surface scouring, and discharge to water bodies.
- If applicable, a stormwater management plan and/or an erosion and sediment control plan will be developed, and all necessary permits will be obtained.
- Implement measures to prevent invasive plants from returning to sites where they have been removed, such as ensuring that construction-related equipment arrives at the site free of mud or seed-bearing materials, and certifying that all seeds and straw material are weed-free.
- Rehabilitate areas that are temporarily disturbed during construction with native grasses and other native species as per NPS standards and consistent with the cultural landscape report.
- Follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties* for all preservation and rehabilitation efforts to historic structures.
- An Unanticipated Discovery Plan will be developed to mitigate potential adverse impacts in the event that archeological resources are encountered during the actions proposed in the alternatives. If during construction previously unknown archeological resources were discovered, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and, if significant resources cannot be preserved in situ, an appropriate mitigation strategy (e.g. the excavation, recordation, and mapping of cultural remains prior to disturbance, to ensure that important archeological data that otherwise would be lost is recovered and documented) will be developed in consultation with the District historic preservation officer and, as appropriate, associated American Indian tribes.
- Tree removal, clearing, and construction activities will not take place during the bird nesting season (April 1–August 31) or the roosting and pupping season of the northern long-eared bat (June 1–July 31), to avoid disturbance to potential maternity roosts and/or nests in the area. During future project phases, if it is determined that clearing or construction is needed during these seasons, the National Park Service will coordinate with the US Fish and Wildlife Service to ensure no impacts will occur.
- Remedial activities addressing contaminants will be designed and implemented to avoid, when possible, adverse impacts on scenery, wildlife, habitat, aesthetic values, and recreational opportunities.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



July 17, 2013

Mr. Gopaul Noojibail, Superintendent
National Park Service
National Capital Parks-East
1900 Anacostia Drive, SE
Washington, DC 20020

RE: Initiation of Section 106 Consultation for the Anacostia Park Management Plan

Dear Mr. Noojibail:

Thank you for contacting the DC State Historic Preservation Office (SHPO) to initiate the Section 106 review process for the development of a Management Plan for Anacostia Park. We look forward to working with the National Park Service (NPS) and interested parties to develop this planning document. We will provide more detailed comments once we have an opportunity to review a first draft, but we encourage the NPS to consider the following general comments while preparing the initial document.

As you are likely aware, the 2007 Programmatic Agreement (PA) which resulted from the Section 106 review of the 11th Street Bridges Project stipulated that a National Register of Historic Places nomination package be prepared for Anacostia Park as mitigation for the adverse effects of the project. The nomination was subsequently revised and refined pursuant to a 2010 amendment to the PA. In our view, one of the first steps that the NPS should take towards improving management of Anacostia Park is to forward the nomination to the Keeper of the National Register so that the historic properties in the park can be formally recognized. We will be happy to assist the NPS in this effort.

Another topic that the Management Plan should address is the on-going proposal to transfer Poplar Point to the District of Columbia. Although transfer of this portion of the historic park out of federal ownership will likely constitute an “adverse effect” as described at 36 CFR 800.5(a)(2)(vii), we encourage the NPS to work with the SHPO and our colleagues in the DC Office of Planning and other District agencies to continue the efforts that were initiated several years ago to identify appropriate development strategies for this area that will take effects on historic properties into account.

With regard to archaeological resources, the District’s City Archaeologist, Dr. Ruth Troccoli, has been in contact with Katherine Birmingham, Cultural Resources Specialist for National Capital Parks-East regarding archaeological resources within Anacostia Park and related properties. Relatively few systematic archaeological surveys of Anacostia Park have taken place in the modern era, although the river floodplains and terraces were well-known locations for collecting prehistoric Native American and contact-period artifacts by early archaeologists in the late 19th and early 20th century. Many of these collections now reside in the Smithsonian Institution, National Museum of Natural History’s curation facility in Suitland, Maryland. The remnants of the contact-period village of Nacotchtanke, which was visited by Captain John Smith in 1608, may be within the park. Large areas of the park are made-land, consisting of landfill that originated from dredging the river channel that was placed within bulkheads in

Mr. Gopaul Noojibail
Initiation of Section 106 Consultation for the Anacostia Park Management Plan
July 17, 2013
Page 2

the river bottom and along the mud flats. Much of the park is mantles in a variable layer of fill that covers the original ground surface. The fill is deeper closer to the river and peter out with distance from the river, and with the rising elevation of the terrain. Archaeological deposits often survive beneath such fill deposits. Made-land tends to have low-to-no archaeological potential, but there are possible exceptions, such as Bonus Army camp locations.

Again, we look forward to working with the NPS and other parties to develop a management plan. In the meantime, please contact me at andrew.lewis@dc.gov or 202-442-8841 if you should have any questions or comments regarding the historic built environment. Questions or comments relating to archaeology should be directed to Ruth Trocolli at ruth.trocolli@dc.gov or 202-442-8836. Thank you for providing this initial opportunity to review and comment.

Sincerely,

A handwritten signature in blue ink that reads "Andrew Lewis". The signature is written in a cursive style with a prominent initial "A".

C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

13-428