



## **FINDING OF NO SIGNIFICANT IMPACT**

### **Installation of Fire Suppression Sprinkler Systems at the Rock Creek Park Nature Center, Public Horse Center and Maintenance Yard**

*Rock Creek Park, Washington, D.C.*

The National Park Service (NPS) proposes to install fire suppression sprinkler systems at three facilities within Rock Creek Park (the "park"): (1) the Nature Center, which is the main visitor center for the park; (2) the Public Horse Center, which is operated by a park concessioner and offers boarding services, riding lessons, trail rides, and other programs to the public; and (3) the Maintenance Yard, which houses the majority of the staff and equipment used to maintain the park, as well as Natural Resource Management staff and equipment. As part of this effort, a new water line is required in order to deliver sufficient water pressure to each of the new fire suppression sprinkler systems.

The project is needed because each facility lacks an automatic sprinkler system. These facilities currently have fire alarms, fire extinguishers, and/or lighted exits. However, NPS policy (Reference Manual 58, "Structural Fire Management") stresses the importance of installing automatic sprinkler protection in NPS buildings, and requires it in buildings undergoing construction or renovation.

In accordance with the National Environmental Policy Act of 1969 (NEPA), the Council of Environmental Quality (CEQ) regulations (40 CFR 1500-1508), and NPS Director's Order #12, the NPS prepared an Environmental Assessment (EA)/Assessment of Effect (AoE), which was released for agency and public review and comment on June 29, 2011. This document was prepared to fulfill the requirements mandated by NEPA, Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and applicable procedures of the Advisory Council on Historic Preservation (ACHP).

### **SELECTED ALTERNATIVE**

The NPS identified Alternative B, installation of fire suppression sprinkler systems, fed by a new water main, as the Selected Alternative for implementation. (This alternative is described on pages 13 and 14 of the EA/AoE). Under the Selected Alternative, fire suppression sprinkler systems will be installed at the Nature Center, the Public Horse Center, and the Maintenance Yard and will be fed by a new water main. The water main will run from Military Road, N.W., to the Nature Center, the Public Horse Center, and the Maintenance Yard, respectively. Its installation will approximately parallel an existing (but limited) water main that already serves these facilities. In order to minimize environmental impacts, approximately 2,430 linear feet of piping will be installed using a jack-and-bore approach with directional, underground drilling. Boring pits will be located in previously disturbed areas.

The three facilities are higher in elevation than Military Road. Therefore, it is believed that it will be necessary to install a diesel water pump at each location to increase water pressure to that location's fire suppression sprinkler system. The first pump will be installed at the Horse Center. In order to accommodate this pump, the former tack room will be enlarged and extended outward from the current building; the existing roofline will be maintained to preserve architectural continuity. The NPS will postpone the diesel water pump installations at the Maintenance Yard and Nature Center pending a performance review of the pump at the Public Horse Center and the availability of additional funding. The impact analysis presented in the EA/AoE, however, assumed that additional water pumps at these locations will be installed.

## **OTHER ALTERNATIVES CONSIDERED**

In addition to evaluating the Selected Alternative, the EA/AoE considered the No Action Alternative (Alternative A). Under the No Action Alternative, the Nature Center, the Public Horse Center, and the Maintenance Yard would not have additional fire suppression sprinkler systems installed. These facilities and their occupants would be protected only by fire alarms, fire extinguishers, and/or lighted exits, as well as response personnel from the District of Columbia's Fire Department, who are automatically notified when an alarm is triggered.

Other alternatives were considered and dismissed. Each of the dismissed alternatives involves the installation of a new water main to supply water to the fire suppression systems. However, the dismissed alternatives differ in how they provide sufficient water pressure to each system. The first dismissed alternative proposed installing a below-grade pump station along the new water main. The second dismissed alternative would have boosted water pressure by using an elevated water storage tank. Each of these alternatives was dismissed from further consideration because, while providing the same level of fire protection, these alternatives were more environmentally damaging and considerably more expensive than the Selected Alternative.

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

The NPS is required to identify the Environmentally Preferable Alternative in its NEPA documents. The NPS, in accordance with the Department of the Interior (DOI) and NPS policies and guidance and CEQ's *NEPA's Forty Most Asked Questions*, defines the Environmentally Preferable Option as the one that "causes the least damage to biological and physical environment." It is the alternative "which best protects, preserves, and enhances historic, cultural and natural resources" (Q6a).

After a thorough review of the EA/AoE, NPS identified Alternative A – No Action as the Environmentally Preferable Alternative. Whereas Alternative B involves the installation of a water main through a forested area and sprinkler systems in buildings potentially eligible for listing on the National Register of Historic Places (NRHP), Alternative A relies upon existing fire countermeasures (including alarms and lighted exits) to protect people and property. Consequently, Alternative A has the smallest ecological and cultural/historical impact.

## **MITIGATION MEASURES**

The NPS has made environmental commitments in support of the Selected Alternative. These commitments are contained in the EA/AoE and include measures to avoid potential impacts, measures to minimize impacts, measures to mitigate impacts, and measures to enhance aspects of the project in order to produce an overall positive impact. The following mitigation measures will be implemented to mitigate or minimize adverse impacts of the Selected Alternative:

### **Cultural Resources**

- Archeological investigations were conducted to determine whether resources are present in the proposed project area. These investigations were carried out by the NPS in coordination with the District of Columbia Historic Preservation Office's Archeologist. No archeological resources were found. However, if previously unknown archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy developed. If necessary, consultation with the District of Columbia Historic Preservation Officer, NPS, and/or the NPS Regional Archeologist will be coordinated to ensure that the protections of resources are addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 will be followed.
- All work will be carried as part of this project will be completed in conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and *NPS Management Policies 2006*.

### **Vegetation**

- Disturbed areas will be replanted using an NPS list of approved native grasses and other native species.
- Within the project's limits of disturbance, flagging or snow fencing will be used along the drip lines of trees to protect the trees' root zones.
- The new water main will be installed so that it roughly parallels the existing one in previously disturbed soils, using a jack-and-bore installation method to minimize plant and tree damage. Boring pits will be located in consultation with the park's certified arborist to avoid loss of, and damage to, large trees, including their roots systems.

### **Visitor Use and Experience & Concessions Operations**

- Disruptions to visitor services and other park operations will be minimized in consultation with the NPS staff and concessions operators.
- As required, ensure that any lane closures are publicized widely and in a timely manner.

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

The NPS has determined that the Selected Alternative can be implemented with no significant adverse effects. As defined in 40 CFR § 1508.27, significance is determined by examining the following criteria:

***Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an Environmental Impact Statement (EIS):*** As described in the EA/AoE, several resources will experience both beneficial and adverse impacts from the proposed action. However, no significant impacts were identified that will require analysis in an EIS.

***Historic Structures:*** The Nature Center, Public Horse Center, and Maintenance Yard, which are potentially eligible for listing in the NRHP, will have fire suppression sprinkler systems installed. The systems will alter these buildings by introducing visual changes, such as exposed pipes and sprinklers on the interior, and possibly diesel water pumps and pump sheds on the exterior, a local, long-term, minor, adverse impact. However, these changes will not alter character-defining features of the buildings or affect their overall integrity as resources. To minimize the adverse impact, prior to the installation of the fire suppression systems, local and regional cultural resource specialists will be consulted regarding strategies for minimizing impacts of the systems to the buildings. All work will be carried out in conformance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and *NPS Management Policies 2006*. Furthermore, in the unlikely event of a fire at one of these locations, the fire suppression system will douse the structure, and its contents, with water, causing some water damage, a local, short-term, minor, adverse impact. On the other hand, the system will protect the buildings, and their contents, from catastrophic loss due to fire, a local, long-term, beneficial impact. There will be no adverse effect under the NHPA.

***Archeological Resources:*** The Selected Alternative will entail ground-disturbing activities. Archeological testing has been conducted along the path of the water main and at the sites of proposed ground disturbance. The archeological testing was performed by the NPS, National Capital Region, Regional Archeological Program staff on August 24-26, 2010. No archeological resources were found. As a result, no impacts to archeological impacts will occur. There will be no adverse effect under Section 106 of the NHPA.

***Vegetation:*** Overall, the Selected Alternative will have a local, long-term, beneficial impact, and local, short-term, minor adverse impacts on vegetation. Under the Selected Alternative, the Nature Center, Public Horse Center, and Maintenance Yard will have fire suppression sprinkler systems installed. In the unlikely event of a fire originating within one of these buildings, the systems will prevent the fire from spreading to surrounding vegetation, a local, long-term, beneficial impact. However, construction activities will adversely impact vegetation by the removal of trees and compaction of the soil, via the machinery used, to make the access pits for the installation of the water line. To mitigate this impact, jack-and-bore digging technology will be used to

minimize damage to vegetation, and trenches and pits will be kept to a minimum. As a result, roughly 16 trees will be adversely impacted (damaged or removed) during the project (12 small trees less than six inches in diameter, and three to four trees greater than six inches in diameter), in addition to limited amounts of grasses and shrubs, a local, long-term, minor, adverse impact. This vegetation will be replaced with native species when the project is complete.

*Visitor Use & Experience:* Under the Selected Alternative, visitors and buildings they frequent will be protected by fire suppression sprinkler systems. In the event of a fire, such systems will minimize damage done to the Nature Center and Public Horse Center and potentially reduce the amount of time that these buildings will be closed for repairs, a park-wide, long-term, beneficial impact. However, installation of the water main and fire suppression systems could cause temporary disruptions to foot and car traffic in and around visitor facilities and create the unsightly view of a construction site, a local, short-term, minor, adverse impact. Also, the visitor experience could be degraded by the appearance of a diesel water pump installed at each facility and the temporary engine sound emitted when such pumps are tested on a monthly basis, a local, long-term, minor, adverse impact. These impacts will be mitigated by obscuring the water pumps from public view with a barrier (such as a fence or shed), performing monthly tests on the diesel pumps during off-peak hours (for example, during the evening or on weekends), and keeping buildings and parking lots open during normal hours of operation for the duration of construction.

*Concessions Operations:* Under the Selected Alternative, the Public Horse Center will be protected by a fire suppression sprinkler system. In the event of a fire, this system will minimize damage done to the Public Horse Center and potentially reduce the amount of time that buildings within the complex will be closed for repairs, a park-wide, long-term, beneficial impact. On the other hand, installation of the water main could cause temporary disruptions to foot and car traffic in and around the Public Horse Center and create the unsightly view of a construction site, a local, short-term, minor, adverse impact. Also, the diesel water pump installed at the Public Horse Center will be tested on a monthly basis, potentially causing temporary disruptions to people and horses from engine noise, a local, long-term, minor, adverse impact. These impacts will be mitigated by minimizing the area of construction disturbance around the Public Horse Center, keeping the facility and its adjoining parking lots open during normal operating hours for the duration of the project, and performing monthly tests on the diesel pumps during off-peak hours (for example, during the evening or on the weekends).

*Degree of effect on public health or safety:* The Selected Alternative will have a beneficial impact on health and safety by providing additional fire suppression capabilities within these park facilities.

*Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas:* No prime farmlands, wild and scenic rivers, wetlands, ecologically critical areas, sites sacred to American Indians, or other significant ethnographic resources occur within or adjacent to the project area, and none will be impacted by the Selected Alternative. However, there are cultural resources within and adjacent to the project area that will be impacted.

This project is located in Rock Creek Park, a historic district on the NRHP. The project is also within close proximity of archeological resources and structures potentially eligible for NRHP listing, such as the Nature Center, Public Horse Center, and Maintenance Yard. Through a letter dated June 18, 2009, the NPS initiated consultation under Section 106 of the NHPA with the District of Columbia State Historic Preservation Office (SHPO). On July 10, 2009, the SHPO responded, indicating that there are archeological sites in the immediate vicinity of the proposed project. The SHPO recommended that a "Phase I identification survey should be conducted for untested areas of the proposed water main alignment prior to initiating any ground disturbing activities for the project." This was reiterated in a letter from the SHPO dated February 18, 2011. A Phase I and Phase II archeological investigation was undertaken by the NPS, National Capital Region, Regional Archeological Program staff on August 24-26, 2010. No archeological resources or significant cultural resources were identified during testing.

Regarding historic structures, the SHPO stated the following in the February 18 letter: “A cursory review of the Rock Creek Park NRHP nomination revealed that most of the subject buildings are described as ‘modern development’ which are ‘low-lying utilitarian buildings constructed of cinderblock, wood and steel.’ While the Nature Center is also described as having ‘the most distinctive architectural design of the group,’ and apparently incorporates a portion of a 1935 frame building, it appears that the fire suppression project will be unlikely to constitute an adverse effect on any of these buildings which may contribute to the Rock Creek Park Historic District – especially if the sprinkler systems are installed in a manner that is consistent with *The Secretary of the Interior’s Standards for Rehabilitation*. We will provide further comments regarding effects on the historic built environment once we have an opportunity to review the additional information contained in the EA.”

The Selected Alternative will have minor impacts on potentially historic structures and no impact on archeological resources. The fire suppression systems will alter historic structures by introducing visual changes, although such changes will not alter character-defining features of the buildings or affect their overall integrity as resources. Impairment of cultural resources will not occur under the Selected Alternative and there will be no adverse effect under Section 106.

On June 29, 2011, the NPS submitted the EA/AoE for review to the District of Columbia SHPO and ACHP. In a letter dated August 2, 2011, the SHPO concluded that “Based upon our review of the EA and the archaeological studies carried out in advance of the undertaking, we concur with the National Park Service’s determination that this undertaking will have ‘no adverse effect’ on historic properties and will require no further SHPO review of comment.”

***Degree to which effects on the quality of the human environment are likely to be highly controversial:*** No highly controversial effects resulting from the Selected Alternative on the quality of the human environment were identified during the preparation of the EA/AoE or the public comment period.

***Degree to which the possible effects on the quality of the human environment are highly uncertain, or involve unique or unknown risks:*** There were no highly uncertain or unique or unknown risks resulting from the Selected Alternative on the quality of the human environment identified during preparation of the EA/AoE or the public comment period.

***Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:*** The Selected Alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

***Whether the action is related to other actions with individually but cumulatively significant impacts:*** Implementing the Selected Alternative will have no significant, cumulative adverse impacts. Minor cumulative adverse impacts will occur to historic structures, vegetation, visitor use and experience, and concessions operations.

***Historic Structures:*** The NPS is rehabilitating Peirce Mill. In addition, implementation of the park’s General Management Plan (GMP) will result in greater protection and interpretation of the park’s other historic structures. Such improvements, along with the Selected Alternative, will result in park-wide, long-term beneficial cumulative impacts (due to greater protection and interpretation of historic structures located inside and outside the project area). Cumulative impacts to the Rock Creek Park Historic District will be short-term, minor, adverse as well as long-term and beneficial.

***Vegetation:*** Local, long-term, minor adverse impacts will result from the construction of a manure shed at the Public Horse Center, which involves the removal of a small number of plants but no trees, and the rehabilitation of Peirce Mill, which resulted in the loss of some grasses, shrubs, and trees. Also, the continued implementation of the park’s GMP will result in new development that could lead to vegetation loss, a local, long-term, minor adverse impact. The GMP also instructs the park to remove invasive species and plant naturally occurring species, a park-wide, long-term, beneficial impact. Therefore, these projects, along with



the Selected Alternative, will have long-term, beneficial, cumulative impacts, as well as long-term, minor, adverse cumulative impacts on vegetation.

*Visitor Use and Experience:* Guest Services, a concessioner operating within Rock Creek Park, has constructed a manure shed at the Public Horse Center on a concrete slab adjacent to the rear paddock and stables, a local, short-term, minor, adverse impact. Also, the continued implementation of the park's GMP will result in new development that could lead to new interpretive and recreational opportunities for visitors throughout the park. This includes rehabilitating and/or expanding the Nature Center to improve the effectiveness of programs for the public, a park-wide, long-term, beneficial impact. These projects, along with the Selected Alternative, will have both local, short-term and long-term, minor, adverse cumulative impacts, and park-wide, long-term, beneficial cumulative impacts on visitor use and experience.

*Concessions Operations:* Guest Services has constructed a manure shed at the Public Horse Center on a concrete slab adjacent to the rear paddock and stables, a local, short-term, minor, adverse impact. This project, along with the Selected Alternative, will result in a park-wide, long-term, beneficial cumulative impact as well as local, short-term and long-term, minor, adverse cumulative impacts.

***Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on NRHP or may cause loss or destruction of significant scientific, cultural, or historical resources:*** The Selected Alternative will not cause loss or destruction of significant scientific, cultural, or historic resources. The project is within Rock Creek Park, a historic district listed in the National Register of Historic Properties. The project will alter potentially historic structures by introducing visual changes, although such alterations will not alter character-defining features of the buildings or affect their overall integrity as resources. However, the Selected Alternative will have minor adverse impacts on these resources and will implement modifications to mitigate or avoid these or other adverse effects.

In accordance with Section 106 of the NHPA of 1966, the NPS submitted the EA/AoE for review to the District of Columbia SHPO and ACHP on June 29, 2011. In a letter dated August 2, 2011, the SHPO concluded that "Based upon our review of the EA and the archaeological studies carried out in advance of the undertaking, we concur with the National Park Service's determination that this undertaking will have "no adverse effect" on historic properties and will require no further SHPO review of comment." (See attached.)

***Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:*** In accordance with Section 7 of the Endangered Species Act, the NPS initiated an informal consultation with the U.S. Fish and Wildlife Service (USFWS) requesting information on the presence of species that are federally listed or proposed for listing as endangered or threatened within the proposed project area. On March 31, 2011, the USFWS responded, stating that "except for the occasional transient individuals, no proposed federally listed endangered or threatened species are known to exist within the project impacts area. Therefore, no Biological Assessment or further Section 7 consultation with the USFWS is required." No impacts to any state or federally listed species will occur.

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

## **IMPAIRMENT OF PARK RESOURCES OR VALUES**

In addition to reviewing the list of criteria for significant impacts, the NPS has determined that implementing the Selected Alternative will not constitute an impairment of park resources or values. This conclusion is based on a thorough analysis of the impacts described in the EA/AoE, agency and public comments received, and the professional judgment of the decision-makers in accordance with NPS *Management Policies 2006*. As described in the EA/AoE, implementation of the Selected Alternative will not result in impairment of Rock Creek Park resources or values whose conservation is (1) necessary to fulfill specific purposes identified in the park's establishing legislation, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified in the park's management plan or other relevant NPS planning documents as being of significance.

As explained below, while the Selected Alternative will result in adverse impacts to some of the park's natural and cultural resources, none of these resources will be impaired.

Under the Selected Alternative, no impacts on archeological resources are expected. As a result, no impairment to archeological resources will occur. While the Nature Center, Horse Center and Maintenance Yard are currently listed in the NRHP, each could be potentially eligible for listing as part of a proposed expansion/update of the Rock Creek Park Historic District. The Nature Center and Maintenance Yard were constructed as part of the 1960s-era "Mission 66" park facilities improvement program, conducted nationwide between 1956 and 1966. The Public Horse Center supports an early planning mission of Rock Creek Park, as horse trails have played an integral role in park operations since 1890.

Under the Selected Alternative, historic structures will not be impaired. The Selected Alternative will not impact these resources to a point where the park would be unable to fulfill the purposes for which it was created, nor does it impinge upon opportunities to enjoy the park. The goal of this project is to provide greater fire protection for these buildings. All adverse impacts resulting from the Selected Alternative will be minor.

In general, vegetation types found throughout the District of Columbia are the same as those found in Rock Creek Park. However, Rock Creek Park is unique in terms of preserving the largest unbroken forest in the area, providing habitat for much of the city's wildlife, and acting as an important contributor to the region's biodiversity. Approximately 80 percent (1,662 acres) of Reservation 339 is covered with mature second growth forest that is approximately 120 years old. Woodlands currently in the park are a mixture of deciduous species typical of eastern forests in the later stages of succession. Inventories of park vegetation have found 238 non-native plant species within the park, 42 of which are classified as invasive, non-native species that, unless controlled, are likely to spread and adversely affect native plant populations.

Vegetation, in general, is necessary to fulfill specific purposes identified in the park's establishing legislation and is key to the natural integrity of the park and to opportunities for enjoyment of the park. Due to the small project area, the limited vegetation that will be affected, and mitigation requiring replanting of areas where vegetation will be removed, the implementation of the Selected Alternative will not result in an impairment to vegetation.

## **PUBLIC INVOLVEMENT**

Beginning in March 2006, NPS staff held internal scoping meetings to review the specifications of fire suppression sprinkler systems capable of protecting the facilities and their occupants. The staff also examined potential issues related to the proposed project, including: (1) impacts to environmental resources; (2) connected, similar, and cumulative actions; and (3) legal compliance requirements.

The park sent scoping letters to third parties, including the SHPO, National Capital Planning Commission (NCPC), the Commission for Fine Arts, the Environmental Protection Agency, District of Columbia Department of Transportation (DDOT), the USFWS, and the District of Columbia Office of Planning. These parties received scoping letters on August 19, 2009, and January 25, 2011. As permitted by NEPA, no direct public scoping was undertaken.

The EA/AoE was made available for public review and comment on June 29, 2011. It was announced via press release from the NPS Office of Communications, and notice of availability letters were sent to parties that previously received scoping letters. The NPS also mailed printed copies the EA/AoE to federal and local government offices, including DDOT and the NCPC. The EA/AoE was also placed on the NPS' Planning, Environment and Public Comment website.

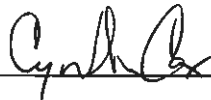
The comment period concluded on July 29, 2011. One comment was received during the comment period that focused on methodology of implementing the Selected Alternative. The comment did not result in any changes to the overall impact analysis or the Selected Alternative that was presented in the EA/AoE. The comment in its entirety along with NPS response is attached.

## CONCLUSION

The NPS has selected Alternative B for implementation. The impacts that will result from the Selected Alternative will not impair any park resource or values necessary to the NPS. The Selected Alternative does not constitute an action that normally requires preparation of an EIS. The Selected Alternative will not have a significant effect on the human environment. No significant impacts will be caused by the Selected Alternative, and negative impacts that could occur are minor or less in intensity. The proposed action will not cause highly uncertain or controversial impacts, unique or unknown risks, or significant cumulative effects. Implementation of the Selected Alternative will not violate any federal, state, or local environmental protection law.

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

Recommended:




Tara Morrison

for Superintendent  
Rock Creek Park

8/8/11  
Date

Approved:

 - Telmhi 8/13/11  
Steve Whitesell

for Regional Director  
National Capital Region

Date



## NPS Response to Comments

Commenter	Comment	NPS Response
Unaffiliated Individual Anchorage, AK 99501 USA	<p>I recommend you follow the road edge, rather than run the water main cross-country. Use the road prism. Then you won't need the high cost of directional drilling, the environmental cost of boring pits (they will be bigger than you think), and it can be done easily. The subsurface ground disturbance of directional drilling in this area with potential subsurface archeology has the real potential to impact cultural historic or prehistoric resources without anyone knowing it because the excavation cannot be monitored. It is much easier to access for repairs or replacement in later years, so in the long run it is cheaper, better, has less environmental impact, avoid the forested area, and no trees need to be cut down. You could even add a bicycle path to the road edge if you want. I recommend you also have fire hydrants at road junctions and parking lots. Don't use diesel! Use propane. It's clean to burn, yields less carbon, less air pollution, less greenhouse gas, less climate change gas, fewer carcinogens, is quieter, and especially it will not spill. Look and virtually any diesel facility and you find spill, soil contamination, potential groundwater contamination, retrofit expense to install better double-walled tanks with containment and alarms. If you would just use propane to start with, you will save lots of money in the long run. And since you are in a developed area, I have no idea why you don't just use electric pumps?! You have electricity right there. A simple water tower would be nice, but you probably can't do that in the park or in a historic district due to visual intrusion impacts. Do not cut any trees down during the spring nesting season in order to follow the Migratory Bird Treaty Act. Thank you.</p>	<p>The National Park Service chose the waterline path because it follows an existing, disturbed utility corridor. Additional archeological testing was performed in the area, and it was determined that there no other archeological resources exists.</p> <p>The decision was made to use a "jack and bore" method because it is the most effective way to place the waterline through a small area of trees without cutting the roots and damaging the trees, unlike open trenching. The water line trail already follows a paved multipurpose trail and the existing fire hydrants through the park. The hydrants' locations were determined by the proximity to the structures.</p> <p>Although the idea of using propane has merit, there is not enough room for the propane tank or its extra facilities in the area around the Public Horse Center. Diesel is the best choice. However, the National Park Service will review the diesel pump's operation and history before determining if similar pumps should be used at the other locations.</p> <p>Electric pumps are not suitable for this project, as a grid power failure would render them inoperative. All diesel fuel storage will be up to date with OSHA and NIFC codes, including the use of a double-walled tank and spill/emergency alarms.</p>

Copy of correspondence from DC State Historic Preservation Office to National Park Service, August 2, 2011

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
STATE HISTORIC PRESERVATION OFFICE



DC STATE HISTORIC PRESERVATION OFFICE  
FEDERAL AGENCY SECTION 106 REVIEW FORM

TO: Ms. Tara Morrison, Superintendent, Rock Creek Park, National Park Service

ADDRESS: via email to [Tara.Morrison@nps.gov](mailto:Tara.Morrison@nps.gov)

PROJECT NAME/DESCRIPTION: Section 106 Review of the Environmental Assessment (EA) for the Proposed Fire Suppression Project at the Nature Center, Public Horse Center and Maintenance Yard

PROJECT ADDRESS/LOCATION DESCRIPTION: Rock Creek Park

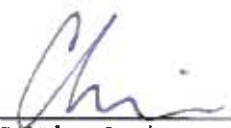
DC SHPO PROJECT NUMBER: 11-079

The DC State Historic Preservation Office (DC SHPO) has reviewed the above-referenced federal undertaking(s) in accordance with Section 106 of the National Historic Preservation Act and has determined that:

<input type="checkbox"/>	This project will have no effect on historic properties. No further DC SHPO review or comment will be necessary.
<input type="checkbox"/>	There are no historic properties that will be affected by this project. No further DC SHPO review or comment will be necessary.
<input checked="" type="checkbox"/>	This project will have no adverse effect on historic properties. No further DC SHPO review or comment will be necessary.
<input type="checkbox"/>	This project will have no adverse effect on historic properties conditioned upon fulfillment of the measures stipulated below.
<input type="checkbox"/>	Other Comments / Additional Comments (see below):

Thank you for providing the DC State Historic Preservation Office (SHPO) with the Environmental Assessment (EA) for the above-referenced undertaking. Based upon our review of the EA and the archaeological studies carried out in advance of the undertaking, we concur with the National Park Service's determination that this undertaking will have "no adverse effect" on historic properties and will require no further SHPO review or comment. Thank you for providing an opportunity to review and comment.

BY:

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

DATE:

August 2, 2011