

National Park Service
US Department of the Interior



GEORGE WASHINGTON MEMORIAL PARKWAY
VIRGINIA

FINDING OF NO SIGNIFICANT IMPACT

GEORGE WASHINGTON MEMORIAL PARKWAY NORTH SECTION REHABILITATION

ARLINGTON AND FAIRFAX COUNTIES, VIRGINIA

The National Park Service (NPS), in cooperation with the Federal Highway Administration (FHWA) – Eastern Federal Lands Highway Division (EFLHD) and National Capital Planning Commission (NCPC), prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to rehabilitate the north section of the George Washington Memorial Parkway (GWMP) from the Spout Run to Interstate 495 (I-495)/Capital Beltway interchanges. This project is being undertaken to repair and rehabilitate deteriorating aspects of the roadway and implement safety improvements in a balance with preserving the cultural and historical characteristics of the GWMP; it is not meant to increase the existing Parkway traffic capacity.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality for implementing NEPA (40 CFR 1500-1508), and NPS Director's Order #12, *Conservation Planning, Environmental Impact Analysis, and Decision-making*. The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

SELECTED ALTERNATIVE

The EA analyzed two alternatives, including one action alternative, and the associated impacts on the environment. Based on the analysis presented in the EA, the NPS has selected alternative B (selected alternative) for implementation. The NPS selected alternative was described on pages 11 through 21 of the EA. The NPS selected alternative will include the following elements:

- Full pavement reconstruction on the northbound and southbound sides of the Parkway from Spout Run to I-495/Capital Beltway;
- Reconstruction of existing unpaved shoulders (6 to 10 feet on outside and 6 to 8 feet on median side; sensitive areas may be reduced to 3 feet) with an aggregate-topsoil mixture and either seeded or laid with sod;
- Replacement of drainage infrastructure, including curbs and existing inlets, as well as the addition of inlets and curb cuts at selective locations;
- Selective replacement of historic guardwalls with 27-inch-high stone masonry guardwalls using a case-by-case design approach consistent with the NPS and FHWA 2018 Wall Safety Risk Assessment:
 - Modify select historic stone walls with superior and/or high views at identified high, medium-high, and medium-medium risk locations
 - Wall # 7N, 8N, 10N, and 12N would be rebuilt with a concrete core and raised to a height of 27 inches above the ground
 - Wall # 1N, 5N, 9N, 29S would be repaired and include safety countermeasures as defined in the EA
 - Rebuild remaining historic stone walls at identified high, medium-high, and medium-medium risk locations with a concrete core and raise to a height of 27 inches above the ground to enhance safety
 - Repair historic stone walls at identified medium-low and low risk locations and include appropriate safety countermeasures;
- Replacement of weathering steel W-beam guardrails with 27-inch-high steel-backed timber guardrails where the median width is minimal

- Construction or extension of acceleration/deceleration lanes at different locations along the north section of the Parkway, including the GWMP Headquarters/US Park Police (USPP) entrance and the CIA/GWMP interchange
- Rehabilitation of 80 drainage outfalls, which could include pipe resetting and installation of a concrete cradle, use of compacted soils and partial vegetative stabilization techniques, use of existing or new pipes, and consolidation or abandonment; and
- Implementing a series of improvements at the Route 123/GWMP interchange, including:
 - Reconfiguration of ramps on the west side of the interchange to improve safety along the GWMP southbound mainline travel lanes
 - Consolidate Route 123 on-ramps to southbound GWMP at a new intersection east of Pine Tree Road (modified diamond interchange)
 - Realign entrance to the Route 123 eastbound on-ramp to southbound GWMP mainline (the roadway would be realigned to be opposite the consolidated off-ramp from southbound GWMP)
 - Maintain a tight northbound GWMP exit ramp to connect with both eastbound and westbound Route 123
 - Remove existing on-/off ramps connecting southbound GWMP with Route 123 in the northwest quadrant of the interchange
 - Extend acceleration/deceleration lanes along the GWMP northbound and southbound mainline travel lanes to allow for safer merging and diverging
 - Install stormwater management (SWM) best management practices consistent with Virginia Department of Environmental Quality (VDEQ) requirements
 - Other improvements that address drainage, signing, pavement markings, curbs, and rehabilitating or resurfacing existing ramps on the east side of the interchange and Route 123.

In addition, the selected alternative would include other project elements, such as construction of emergency turnarounds, minor rehabilitation of the scenic North and South Donaldson Run overlooks, installation of conduits and manholes for future Intelligent Transportation Systems (ITS), installation of SWM facilities consistent with VDEQ requirements, and construction maintenance of traffic. This project will be implemented as a multi-year, phased construction project based on available funding.

RATIONALE FOR DECISION

For the rehabilitation of the north section of the Parkway, the NPS has selected several actions that will be undertaken as a multi-year, phased construction project, as described in this FONSI. As described in the EA on pages 3 and 4, the rehabilitation of the north section of the Parkway is needed to help preserve the historic parkway for future generations, improve the visitor experience, enhance maintenance/enforcement operations, address erosion and safety concerns at drainage outfalls, and facilitate safe driving conditions. The project need stems from the age and heavy use of GWMP infrastructure that has resulted in deterioration of the roadway and drainage system.

The NPS, in conjunction with the FHWA, undertook numerous studies related to traffic and safety, cultural and visual resources, and vegetation; held an Alternatives Workshop; and completed a detailed assessment analyzing visual rankings and safety risk factors at each individual section of guardwall that exists along the north section of the Parkway.

The following specific conditions contribute to the rationale for decision to rehabilitate the north section of the Parkway:

- The pavement within the project area contains large numbers of potholes, cracks, and settlement. The curb along the Parkway has deteriorated.
- Existing soil shoulders have been damaged because of improper drainage, plowing, and frequent pull-off by cars.
- The existing drainage system does not drain the road surface effectively, which causes hazardous driving conditions due to stormwater ponding on the road surface. Also, some of the existing drop inlets are deteriorating.
- The historic stone masonry guardwalls do not meet current safety requirements.
- Acceleration and deceleration lanes are inadequate at certain locations along the Parkway, such as the GWMP Headquarters/USPP entrance. These conditions make entering and exiting these areas difficult during peak travel periods.
- Erosion is occurring at most of the drainage outfalls and has caused deep gullies along steep slopes that present a safety concern and have resulted in resource-related impacts.
- The existing configuration of the Route 123/GWMP interchange presents a safety concern. There are three clover-leaf ramps from the Parkway to Route 123 that have tight geometry and the deceleration lane length is inadequate.
- Other needs include emergency turnarounds to improve maintenance and USPP response to incidents on the north end of the GWMP and installation of conduits and manholes to accommodate future ITS infrastructure.

Therefore, given the aforementioned reasons related to preservation maintenance, operational and financial efficiency, and the safety of all who travel along the north section of the Parkway, the NPS selected alternative B.

ALTERNATIVES CONSIDERED

The EA provided an overview of the proposed project and analyzed one additional alternative and its impacts on the environment: Alternative A, the No Action Alternative (page 11 of the EA).

MITIGATION MEASURES

The selected alternative incorporates the mitigation measures listed in Appendix A of this document. Mitigation measures were updated based on comments received during public and regulatory review of the EA. This list provides a framework for mitigation measures that will be included in the contractor's specifications. Additional mitigation measures and best management practices could be added to this list at the discretion of the NPS.

FINDING OF NO SIGNIFICANT IMPACT

As documented in the EA (pages 49 through 81), the selected alternative has the potential for adverse impacts to surface waters, vegetation, historic structures, cultural landscapes, visual and aesthetic resources, transportation, and visitor use and experience, as well as minimal impacts to wildlife and archeological resources; however, the NPS has determined that the selected alternative can be implemented without significant adverse effects, as defined in 40 CFR §1508.27. A non-impairment determination is included as Appendix B.

Construction-related activities may adversely affect surface water quality as a result of increased sediment movement into surface waters during the construction period. In addition, construction will result in impacts to vegetation from clearing activities for roadside barrier modification, acceleration/deceleration lane modifications, and roadway drainage outfall repairs. Based on surveys completed by the Virginia Department of Conservation and Recreation (VDCR) in 2005, some outfall locations are near known populations of eastern buttercup phacelia. Ground disturbance from construction activities associated with the selected alternative also has the potential to result in the introduction of exotic and invasive herbaceous plant species that could outcompete native vegetation. However, best management practices

and mitigation measures described in Appendix A will be implemented to minimize the potential for any such adverse effects to water resources and vegetation (including rare, threatened, and endangered species).

The NPS anticipates very little impacts on wildlife, including migratory birds, bald eagles, the northern long-eared bat, and the Indiana bat within the project area. Individuals in the vicinity of the Parkway are likely to have adjusted to traffic noise, but there would be additional noise generated by heavy construction equipment. Vegetation clearing would also have the potential to disrupt wildlife. Based on the small amounts of clearing required to establish these improvements and the reestablishment of vegetation following construction in the areas, impacts to wildlife habitat associated with these actions are expected to be minimal.

Implementing the selected alternative will result in adverse effects to historic structures and cultural landscapes from introducing new non-historical elements that will diminish the integrity of the setting, design, materials, and feeling of the historical character and elements of GWMP. However, the Parkway would remain intact and will still retain its listing in the National Register; therefore, the adverse effects will be less than significant. Adverse impacts will be minimized and mitigated through the measures outlined in the 2018 Programmatic Agreement (PA).

The construction of higher, permanent, roadside barriers will result in long-term adverse impacts to visual and aesthetic resources, as well as visitor use and experience, due to a slight, but noticeable change to select superior and high-quality vistas of the Potomac River Gorge and Washington, District of Columbia (DC) monumental core along the Parkway. However, as a result of a collaborative evaluation process, including the development of the 2018 Wall Safety Risk Assessment (Appendix C) as discussed on pages 6, 14, and 15 of the EA, NPS and FHWA determined that 38% of historic stone masonry walls would be reconstructed to a height of 27 inches for safety purposes. The remaining 62% of the historic stone masonry walls would be retained and repaired, and safety countermeasures would be implemented.

The NPS anticipates there will be no to negligible adverse impacts to archeological resources as the areas with known archeological resources would be avoided or protected and mitigation measures implemented. A list of mitigation measures is provided to protect archeological resources as outlined in Appendix A and incorporated into an Archeological Resources Protection Plan.

Construction activities (e.g., lane closures, detours) will have a short-term adverse impact to transportation and visitor use and experience due to increased vehicular traffic congestion. Access to park locations like Turkey Run could be temporarily interrupted or detoured. During construction, a transportation management plan will be developed, and a traffic control plan will be implemented. In the long term, infrastructure improvements associated with the selected alternative will improve the existing Parkway conditions for motorists/visitors by improving traffic operations and safety.

There will be no significant impacts on public health, public safety, or unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state, or local environmental protection law.

PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

Public involvement and agency consultation was conducted at both the scoping and EA public review stages. A summary of public involvement and agency consultation is included in Appendix D.

National Historic Preservation Act Section 106 Consultation

In accordance with Section 106 of the National Historic Preservation Act of 1966, the NPS sent a package of information to the Virginia Department of Historic Resources (VDHR), DC State Historic Preservation Office (SHPO), Maryland Historical Trust, and Advisory Council on Historic Preservation on May 25, 2016 to reinitiate the consultation process for the project. Each of these letters described prior Section 106 consultation and invited the corresponding agency to submit preliminary comments regarding the re-initiation process by June 17, 2016.

With the re-initiation of the Section 106 process, a new project PA was developed in consultation with the VDHR and consulting parties. In this 2018 PA, the NPS outlines the approach to further consultation under Section 106, which includes a context sensitive design approach to further minimize impacts once more design details are available. The NPS will continue to coordinate with VDHR and other consulting parties under the new PA that will be executed with stipulations for mitigation. The 2018 PA is provided as Appendix E.

Endangered Species Act Section 7 and Special Concern Species Consultation

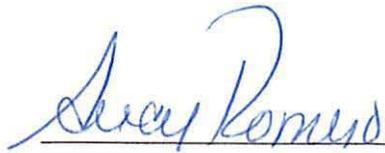
Section 7 Consultation. The NPS submitted a project review request through the US Fish and Wildlife Service (USFWS) ECOS-IPaC System to obtain an official list of species and/or critical habitat that may occur within the boundary of the north section of the GWMP rehabilitation project and/or may be affected by the proposed action. On March 6, 2017, the NPS received a letter from the USFWS Virginia Field Office containing a list of threatened and endangered species that may occur within the project limits, including the northern long-eared bat and the Indiana bat. Subsequently, the NPS coordinated with the USFWS on additional information and/or conservation measures pertaining to these species in consideration of the proposed project. The NPS anticipates that the Indiana bat and northern long-eared bat are not likely to be affected, as conservation measures would be implemented to protect these species. Therefore, these species were not evaluated in detail during the development of the EA.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA.

Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

Recommended:



Alexcy Romero
Superintendent
George Washington Memorial Parkway
National Capital Region



Date

Approved:



Lisa A. Mendelson-Ielmini
Acting Regional Director
National Capital Region



Date

LIST OF APPENDICES

- Appendix A Mitigation Measures
- Appendix B Non-Impairment Determination
- Appendix C 2018 Wall Safety Risk Assessment
- Appendix D Environmental Assessment Comments and Responses
- Appendix E Section 106 Programmatic Agreement

APPENDIX A

MITIGATION MEASURES

To prevent and minimize environmental impacts related to the action alternative, the National Park Service (NPS) will implement best management practices and mitigation measures during the construction and post construction phases of the project. General and resource specific best management practices and mitigation measures are listed below by impact topic. This list provides a framework for mitigation measures that will be included in the contractor's specifications; future mitigation measures could be added to this list at the discretion of the NPS.

Various best management practices will be adopted as part of the selected alternative and will be incorporated into design plans and specifications, providing a contractual requirement that any contractor retained for any phase of the action will abide by the conditions and procedures identified in this document and permits. Those typical mitigation measures that could be applied are described below. The list of mitigation measures has been updated based on comments received during the public and regulatory review of the environmental assessment (EA). The mitigation measures included below supersedes the list of mitigation measures presented in the Draft EA. Mitigation measures will continue to be refined as the design of the project develops and as permit conditions are defined by the regulatory agencies.

CULTURAL RESOURCES

The NPS would continue coordination with the Virginia Department of Historic Resources (VDHR), Federal Highway Administration (FHWA) Eastern Federal Lands Highway Division (EFLHD), Advisory Council on Historic Properties, and other consulting parties in accordance with Section 106 of the National Historic Preservation Act of 1966. As the project proceeds with project planning, design, and construction, the NPS and FHWA would follow the provisions described in the 2018 Programmatic Agreement (PA). A draft of the PA is available for review in Appendix E of the FONSI.

In addition, mitigation measures for cultural resources include, but are not limited to:

- Reconstructing the new 27-inch roadside barriers using stone from the existing guardwalls to the extent possible. A model wall would be constructed by the contractor at the start of the project for NPS review and acceptance to assure the craftsmanship meets NPS requirements.
- Replacement of vegetation and new planting plans would consider George Washington Memorial Parkway's (GWMP) original planting plan. Planting plans would be coordinated with GWMP staff and NPS Regional Office Cultural Landscape staff.
- High visibility construction fencing or other means of delineating sensitive no work areas during construction. In addition, archeological monitoring would be used for excavations near or in areas with high potential for discovery (see outfall rehabilitation mitigation that follows).
- A viewshed management plan shall be developed based on the recommendations presented in the *Visual Resource Treatment Option* report to provide guidance on enhancing and restoring scenic conditions along the GWMP North Section, that are keeping with its historic character.
- An education program implemented by the contractor, with review and approval by the NPS, would be used prior to construction to inform their staff of the sensitive resources in the area and protocols to follow for protection as well as new discovery.

Mitigation for this undertaking would be conducted in a manner that is consistent with the *Secretary of Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Structures* and the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. In addition, the NPS has prepared an Archeological Resource Protection Plan for this project, which provides strategies for construction tasks and other activities associated with the

undertaking to avoid, minimize, or mitigate impacts to archeological sites. This plan would be adhered to during design and construction.

If archeological resources are uncovered during construction, all excavation work in that area would cease and archeological resources would be investigated by archeologists of the park's cultural resources staff meeting the *Secretary of Interior's Qualification Standards*. If the archeological resources are determined to be potentially significant, the NPS would consult with the VDHR to determine the appropriate next steps and, if necessary, appropriate mitigation strategies. 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 of 1990 (25 U.S.C. 3002) would be followed. All human remains, funerary objects, sacred objects, or objects of cultural patrimony would be left in place until the culturally affiliated tribe(s) was consulted and an appropriate mitigation or recovery strategy developed.

In the event human remains are discovered, ground disturbing activities would immediately cease, appropriate NPS Cultural Resources staff would be notified, as well as the local authorities, such as the police and/or the coroner, and the VDHR in compliance with the Code of Virginia 10.1-2035. Paleontological remains and archeological specimens found within the construction area would be removed only by the NPS or their designated representatives. Workers would be informed on the penalties for illegally collecting artifacts or intentionally damaging archeological or historic properties. Workers would be informed of the correct notification procedures in the event that previously unknown resources were uncovered during construction. In designated areas, ground-disturbing activities would be monitored by a NPS qualified archeologist for unanticipated discovery of archeological resources. If cultural material is uncovered during construction, work in the immediate area would be stopped, the site secured, and GWMP would consult with VDHR per 36 CFR 800.13.

TRANSPORTATION, TRAFFIC, AND SAFETY MITIGATION

Traffic Control and Management

A transportation management plan (TMP) would be developed by the EFLHD in coordination with the other involved state departments of transportation and local governments and adhered to during construction by the contractor. Various work restrictions are necessary to minimize the impacts on traffic and safety. The EFLHD has prepared conceptual phasing options to determine the most desirable method of maintaining traffic during construction. The majority of the work would be constructed using median crossovers and temporary pavement widening to allow maintaining two lanes of traffic in both the inbound and outbound directions during the AM and PM rush hours. Where it is not feasible to construct median crossovers, or where there is insufficient width to construct the necessary pavement widening, the minimum traffic maintenance would include long-term continuous lane closures in one direction. This would leave only one lane open to traffic on the affected roadway at all times for the duration of construction on that roadway.

Coordination of Regional Transportation Projects

The EFLHD, working in close coordination with the NPS, would consider the potential short-term adverse cumulative impacts on traffic when scheduling construction projects on the Parkway. Specifically, the traffic control and construction for any other road/bridge improvements, being conducted on the GWMP or within the NPS National Capital Region including FHWA, Virginia Department of Transportation, and District Department of Transportation projects, such as the Arlington Memorial Bridge Rehabilitation Project, would be coordinated and scheduled to minimize the potential cumulative impacts to traffic on the Parkway.

Trail Protection and Provisions

The TMP would consider detours, closures, and protective measures for the Potomac Heritage Trail (PHT) to ensure that visitors are safely and efficiently routed around construction activities in the project area. This plan would include means for communicating construction and closure schedules to the public

and adequate barriers to keep visitors clear of active construction zones. In the event of total trail or road closures, press releases and notices on the park website would be made and signage would notify drivers, the state departments of transportation, and local governments of the intended closure dates and times.

The PHT and a local trail provide access through the Route 123/GWMP interchange. Trail safety provisions such as detours and user notifications would be implemented and incorporated into the public notification efforts for the duration of the selected alternative's design and construction phases. The NPS would try to keep the trail open during park operating hours, and any trail closures between Theodore Roosevelt Island and South Donaldson Overlook would be temporary and only during the guardwall repair activities.

NATURAL RESOURCES

Use of Best Management Practices

Best management practices would be implemented by the contractor during construction to avoid and minimize impacts to natural resources. Soil compaction and disturbances would be kept to a minimal amount needed for construction activities. Appropriate sediment and erosion control measures (such as the installation of silt fences and inlet protection) would be implemented to reduce erosion and runoff from the construction area. Disturbed soils would be revegetated according to GWMP and Virginia Department of Environmental Quality (VDEQ) requirements for soil stabilization and revegetation, including weed control measures. The contractor would implement measures to control fugitive dust during construction. Construction fencing would be installed near all park designated sensitive resource areas. The EFLHD construction engineer and a biological monitor dedicated to the project would be responsible for monitoring and enforcing the no impact zones.

Surface Waters

The selected alternative would be constructed in such a manner as to avoid degrading water quality to the maximum extent possible. During construction, measures would be employed to prevent or control spills of fuels, lubricants, or other contaminants from entering waterways or wetlands. In addition, on-site water monitoring would be conducted if construction is needed on the banks of Windy Run, Gulf Branch, Dead Run, and known seeps to ensure that water bodies within the study area would not be adversely impacted by construction activity. The contractor would implement erosion control measures to protect local water bodies from contamination. Actions would be consistent with the state's water quality standards and the Clean Water Act Section 401 certification. In the event outfall repairs are in waters of the United States, a joint federal/state permit application would be prepared and submitted to Virginia Marine Resources Commission (VMRC) to obtain the appropriate authorization from the US Army Corps of Engineers, VDEQ, and VMRC, for impacts to regulated water resources.

Vegetation

Impacted trees and shrubs would be replaced on a one-to-one diameter at breast height (dbh) ratio to the extent practicable. Coordination with NPS Cultural and Natural Resources staff and the contractor will ensure the scenic vistas are enhanced and sensitive plant communities are protected. Replanting would not occur in areas of significant vistas as defined in the 2014 Visual Resource Inventory & Assessment. Restored areas would be monitored by the responsible party identified in the construction specification for up to three years after construction to determine if reclamation efforts are successful or if additional remedial actions are necessary. Remedial actions would include installation of erosion-control structures, reseeding and/or replanting the area, and controlling non-native plant species. To avoid the introduction of non-native/noxious plant species, no imported topsoil or hay bales would be used during re-vegetation. On a case-by-case basis, the following materials would be evaluated for use for any erosion-control dams that would be necessary: certified weed-free rice straw, cereal grain straw that has been fumigated to kill weed seed, and wood excelsior bales.

Treatment of non-native vegetation would be completed in accordance with the *NPS Integrated Pest Management Program*. To prevent the introduction and minimize the spread of non-native vegetation and noxious weeds, the following measures would be implemented during construction:

- Minimize soil disturbance through erosion and sediment control best management practices.
- Pressure wash and/or steam clean all construction equipment to ensure that all equipment, machinery, rocks, gravel, or other materials are cleaned and weed free before entering the Parkway.
- Cover all haul trucks bringing asphalt or other fill materials from outside the park to prevent seed transport.
- Limit vehicle parking to existing roadways, parking lots, or access routes.
- Limit disturbance to roadsides and culvert areas, including limiting equipment to the roadbed area; no machinery or equipment should access areas outside the construction zone.
- Obtain all fill, rock, or additional topsoil from the project area, if possible. If not possible, obtaining NPS approved weed-free sources from outside the park would be required.
- Initiate revegetation of disturbed sites immediately following construction activities based on review and approval from the NPS.

These measures would be specified to the contractor in the contract documents.

Rare Plants and Exotic/Invasive Species Management

- Perform rare plant surveys within the limits of outfall repairs to identify and delineate confirmed occurrences of eastern buttercup phacelia at the approved time of year immediately before construction for each phase of work.
- Minimize disturbance by specifying 6- to 12-foot wide access corridors to the contractor that minimize vegetation removal and avoid known occurrences of eastern buttercup phacelia.
- Realign or relocate construction access corridors if occurrences of eastern buttercup phacelia are identified to avoid the potential for disturbance whenever possible. Areas where eastern buttercup phacelia are identified would be fenced and included as a no impact zone during construction.
- Provide an independent biological monitor during outfall repairs near known occurrences of eastern buttercup phacelia.
- Reduce the introduction of exotic and invasive plant species by minimizing soil disturbance; pressure washing and/or steam cleaning construction equipment and materials; limiting vehicle parking to existing roadways, parking lots, or access routes; obtaining all fill, rock, or additional topsoil from the project area if possible, or weed-free sources from approved sources outside the park; and revegetating disturbed areas immediately following construction.
- On a case-by-case basis, minimize the introduction of exotic and invasive species using certified weed-free rice straw, cereal grain straw that has been fumigated to kill weed seed, and wood excelsior bales.
- Perform work near sensitive area during the winter months to prevent the likelihood of herbaceous exotic and invasive species establishment.
- Project information and an associated map will be resubmitted to the Virginia Department of Conservation and Recreation (VDCR) for an update to natural heritage information if the scope of the project changes and/or six months has passed.

Wildlife including Rare, Threatened, and Endangered Species

For species of concern, areas with high potential or known resources would be surveyed at the approved time of year before construction for each phase of work. The approved time of year would be determined through ongoing consultation with the GWMP's Natural Resource Manager and the VDCR. To minimize the potential for impacts to northern long-eared bats during construction, tree removal would not be conducted from April to October. If any species is discovered during the survey, the area would be fenced and included as a no impact zone.

In addition, project information and an associated map will be resubmitted to VDCR for an update to natural heritage information if the scope of the project changes and/or six months has passed. The NPS will coordinate with the Virginia Department of Game and Inland Fisheries, with regard to the Wood turtle to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Outfall Repair Construction Access

- Stake, flag, or mark construction limits and natural resource protection areas and cultural resources protection areas prior to construction.
- Identify and document the size and type of trees to be removed, and no impact zones that would include known occurrences of eastern buttercup phacelia, on access plans.
- Install appropriate barriers to protect individual trees and on both sides of construction access corridors.
- Surface construction access corridors with protective matting or similar best management practices.

OUTFALL REHABILITATION

In some instances, access to the areas for outfall rehabilitation is near known sensitive resources and outside of the existing disturbed areas. Many of these areas have been previously surveyed for rare plants and archeological resources. Additional natural and cultural resource surveys would be completed on a case-by-case basis, prior to subsequent design reviews, if required by GWMP resource management staff. Additional hydrological and hydraulic analysis would be performed as necessary during the detailed design process to determine the potential impacts to streams and to assure adequate channel and bank protection. In areas of known rare species, biological monitoring would be performed to help monitor water quality and minimize disturbance to suitable habitat. Best management practices to minimize ground disturbance would be applied globally to the entire project, particularly drainage outfall construction activities.

At each design review, the interdisciplinary team, including GWMP resource staff, would conduct a field review, using the most up-to-date plans, and make recommendations for additional mitigation strategies or special contract requirements. FHWA would make recommendations on how to provide construction access to outfalls that fall outside of existing disturbed corridors (i.e., over existing pipes) as soon as possible and prior to submission of the 70% design plans for GWMP resource staff review. Comments from GWMP resource management staff would be incorporated into the 70% design plans.

A six- to twelve-foot-wide access corridor would be specified to the contractor to minimize ground disturbance. The access corridors would avoid all areas of known sensitive resources. The access plan should identify the size and type of trees to be disturbed, and GWMP staff or an NPS approved, certified arborist would document these trees prior to disturbance. Individual trees requiring protection would be identified and appropriate barriers constructed. Access corridors would be surfaced with appropriate protective matting or similar best management practices to further prevent disturbance. Construction barrier fencing would be required on both sides of construction access corridors. Access plans would also identify no impact zones, which would be the location of sensitive natural or cultural resources.

Prior to any drainage outfall construction activities (including clearing and grubbing, stockpiling of materials or equipment, and construction access routes), biological monitors and cultural resources staff would stake, flag, or mark construction limits and resource protection zones around cultural resource areas (i.e., historic stone headwalls) and natural resource areas (i.e., specimen trees, trees larger than four-inch dbh, seeps). All drainage outfall construction activities would be conducted within the established construction limits and outside resource protection zones.

Archeological monitoring would be implemented during ground disturbing activities near culturally sensitive resources identified on the final design plans. Should archeological resources be discovered during ground disturbing activities, work would be halted in the area and the site secured until further direction from the Contract Officer. Construction debris would be immediately hauled away to an appropriate disposal location. GWMP resource staff, in consultation with FHWA, would make

recommendations for additional outfall channel rehabilitation beyond what is shown on the 30% review plans. Soft (minimal impact) solutions would be explored for channel rehabilitation to the next downstream confluence, and in some cases, beyond, to a logical termination.

During construction, a Spill Prevention and Response Plan/Stormwater Pollution and Prevention Plan would be in place, stating preventative measures as well as what actions would be taken in case a spill occurs. Construction debris would be immediately hauled to an appropriate and NPS approved disposal location. Potential roadside habitat for small wildlife would be replaced if destroyed or damaged during construction. Restored areas would be monitored after construction to determine if reclamation efforts are successful or if additional remedial actions are warranted. Revegetation would be initiated immediately following construction using site adapted native seed and/or plants. At the request of GWMP staff, trees removed by construction efforts would be left on site as appropriate. Drainage outfalls identified as requiring additional rehabilitation would be re-contoured and revegetated to natural conditions (natural spacing, abundance, and diversity of native plant species in the local vicinity) specified by GWMP staff and would be initiated immediately following construction. Native topsoil would be stripped and stored prior to any construction activity and reused as part of re-contouring and revegetation activities. Imported hay bales or imported topsoil would not be permitted for any outfall construction or rehabilitation activities. Seed and planting plans would be implemented at the GWMP resource staff's discretion.

During construction, the following mitigation measures are recommended, where practicable, to limit impacts because of outfall repair access and construction:

- An independent biological monitor in consultation with the NPS Natural Resources Manager should be present during the construction activities for outfall repair and wall reconstruction. It is recommended that the contractor consult with this individual in the field as to the best access routes to each outfall in need of repair to minimize impacts to natural resources. Furthermore, tree protection measures should be explored and impacts to trees documented in the field.
- Any necessary tree pruning and/or removal should be conducted under the guidance of a tree care professional, such as a licensed arborist.
- The contractor should seek ways to minimize ground disturbance, such as rutting from construction equipment to the extent possible.
- When feasible, work in sensitive areas should be performed during the winter months when the ground is frozen, and herbaceous invasive species are less likely to establish.
- Where slopes permit, the use of structural matting or similar best management practices, should be utilized. While protective tree fencing would not be practical at each outfall repair point, the structural matting would be a useful tool in laying out least impacting access routes as well as to minimize ground disturbance caused by construction equipment accessing the outfall.
- Equipment size would be kept to a minimum for what is needed on each access route.

Pedestrian detours would be established and maintained around construction areas where required (i.e., PHT). Trail safety provisions would be implemented along the PHT such as detours and closures. User notifications would be incorporated into the public notification efforts for the duration of design and construction. The NPS would make all feasible efforts to keep the trail open during park operating hours, and any trail closures would be temporary.

The GWMP Superintendent, NPS Denver Service Center Project Manager, and GWMP Project Manager would ensure that each project phase remains within the parameters established in the compliance documents and that required mitigation measures and special contract requirements are properly implemented. GWMP resource staff and project managers would conduct and document a "Lessons Learned" field review/roundtable after the completion of each phase of construction to be incorporated into subsequent phases of construction.

An education program, reviewed and approved by the NPS, would be presented by the field contact representative to all construction personnel prior to any construction activities. Following the onset of construction activities, any new employees would be required to formally complete the education program prior to working onsite. As a minimum, the education program would cover the following topics:

1) culturally and naturally sensitive resource distribution/ occurrence; 2) sensitivity to human activities; 3) legal protection; 4) penalties for violation of state or federal laws; 5) reporting requirements; and 6) project protective mitigation measures. The NPS field contact representative would conspicuously stake, flag, or mark work area boundaries (including new access roads, realignments, and parking/turnout areas) to minimize surface disturbance to the surrounding habitat. Material stockpiling, machinery storage, and vehicle parking would only be permitted in designated areas.

As more information is made available during the detailed design phase, the design and construction methods would be evaluated for environmental consideration by a natural resources specialist familiar with the conditions on the GWMP.

PUBLIC OUTREACH

To notify park visitors and commuters of construction-related delays or changes in traffic patterns, the NPS would use a combination of public notification techniques such as posting information on the park's website and public information meetings and/or open houses. Variable message boards on the Parkway would be posted two weeks in advance of construction and public notices would be placed in local newspapers or other sources. The public outreach measures would be described in the transportation management plan.

APPENDIX B

NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (16 USC§ 1). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (16 USC 1a-1). 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 Nation 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.”

The NPS has discretion to allow impacts on Park resources and values when necessary and appropriate to fulfill the purposes of a Park (NPS 2006 sec. 1.4.3). However, the NPS cannot allow an adverse impact that will constitute impairment of the affected resources and values (NPS 2006 sec 1.4.3). An action constitutes an impairment when its impacts “harm the integrity of Park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006 sec 1.4.5). To determine impairment, the NPS must evaluate “the particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (NPS 2006 sec 1.4.5).

This determination on impairment has been prepared for the selected alternative described in this Finding of No Significant Impact. An impairment determination is made for all resource impact topics analyzed for the selected alternative. An impairment determination is not made for visitor use and experience or navigation because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values.

SURFACE WATERS

The NPS selected alternative will not result in impairment of surface waters because of the temporary nature of the impacts and because the construction methods will include best management practices to minimize impacts to surface waters. Erosion and sediment control measures will be put in place at the staging areas to minimize runoff of sediments from the site into the Potomac River.

VEGETATION INCLUDING RARE PLANTS

The NPS selected alternative will not result in impairment of vegetation because the construction methods will include mitigation measures to reduce impacts to vegetation and to minimize the spread of exotic and invasive species. In the context of the larger park setting and the vegetation that exists at George Washington Memorial Parkway (GWMP), the impacts would be noticeable but would not be significant.

WILDLIFE INCLUDING RARE, THREATENED, AND ENDANGERED SPECIES

Impacts to wildlife will be limited to construction-related temporary impacts including a slight loss of habitat and noise generation, and mitigated through the use of best management practices, such as

construction timing restrictions. Vegetation clearing will also have the potential to disrupt wildlife. As a result of these limited impacts, there would be no impairment to wildlife habitats as a result of implementing the selected alternative.

HISTORIC STRUCTURES

The selected alternative will not result in impairment of historic structures because the GWMP will retain sufficient features to retain its status as a National Register listed site and adverse impacts will be minimized and mitigated through the measures outlined in the 2018 Programmatic Agreement. The temporary nature of construction impacts will not result in the loss of National Register eligibility for other resources in the project area.

ARCHEOLOGICAL RESOURCES

The selected alternative will not result in impairment of archeological resources as the actions would not diminish the integrity of the archeological resources to the extent that they would be rendered ineligible for listing in the NRHP. In addition, any adverse impacts will be minimized and mitigated through the measures outlined in the 2018 Programmatic Agreement as well as an Archeological Resources Protection Plan to be developed in consultation with the Virginia Department of National Resources.

CULTURAL LANDSCAPES

The selected alternative will not result in impairment of cultural landscapes because the GWMP will retain sufficient features to retain its status as a National Register listed site and adverse impacts will be minimized and mitigated through the measures outlined in the 2018 Programmatic Agreement. The temporary nature of construction impacts will not result in the loss of National Register eligibility for other resources in the project area. The project also will be conducted in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*. In addition, removed trees may be replaced in kind or with similar species to maintain the GWMP vegetative character and to be consistent with the Parkway's designed landscape.

VISUAL AND AESTHETIC RESOURCES

The selected alternative will not result in impairment of visual and aesthetic resources because the changes to a small percent of the guardwalls (both raise in height and change in appearance) represent a small portion of the overall views available to visitors along the Parkway in the context of the north section of the Parkway. In addition, the 2018 NHPA Section 106 Programmatic Agreement will also detail measures to further avoid and minimize impacts to these resources.

CONCLUSION

The NPS has determined that the implementation of the NPS selected alternative will not constitute an impairment of the resources or values of the George Washington Memorial Parkway. 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 its establishing legislation, key to their natural or cultural integrity or to opportunities for enjoyment, or identified as significant in 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, the 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*.

APPENDIX C

2018 WALL SAFETY RISK ASSESSMENT

APPENDIX D

ENVIRONMENTAL ASSESSMENT COMMENTS AND RESPONSES

No.	Comments	Responses
1	<p>Hiker- and pedestrian-friendly improvements</p> <p>There are two sections of the GW Parkway where safety improvements could be made for pedestrians:</p> <p>1. Washington Boulevard crossings at Memorial Circle. The north and south crossings on the Memorial Avenue approach to Memorial Bridge would benefit greatly from improved lighting at night (particularly the north crossing) and triggered pedestrian crossing flashers. These improvements may already be planned as part of the Memorial Bridge rehabilitation.</p> <p>2. The Potomac Heritage Trail where it crosses Chain Bridge Road, adjacent to the GW Parkway. Currently, the trail directs hikers down under Chain Bridge Road and across the off- and on-ramps for the GW Parkway. It may be worth examining moving that crossing up to Chain Bridge road, so hikers aren't crossing in high-speed areas (particularly the off-ramp, where view of the crosswalk is obscured by the overpass supports). If nothing else, this crossing could use increased signage (and trail blazes) and repainted crosswalks.</p>	<p>The Washington Boulevard crossing at Memorial Circle referenced in the comment is not within the study area or scope of this project.</p> <p>The recommended crossing improvements of the Potomac Heritage Trail will be further considered during final design.</p>
2	<p>As a daily commuter who drives into the city via Spout Run, the GWMP, and the Roosevelt Bridge, I propose two changes:</p> <p>1. the merge lane from south/east-bound Spout Run should be extended to connect up with the existing exit lane for the Key Bridge. Each morning, there is a significant traffic bottleneck as traffic merges from three lanes into two when the Spout Run merge ends. That is often made worse when the Key Bridge exit traffic backs up into one of those two south-bound through lanes, forcing all through traffic into the left-most lane. Connecting the Spout Run merge with the Key bridge exit will permit extra room for key bridge drivers to line up, and smooth out the through traffic flow on the other two lanes, speeding traffic that is destined for the Roosevelt Bridge.</p> <p>2. The Roosevelt Bridge exit lane should both be extended and physically separated from the adjacent lane, as far as the roadside permits. It regularly backs up into the second lane of traffic, forcing cars to again move left around the end of the line. This is hazardous and has led to many accidents when cars coming around the Key Bridge turn are surprised by stopped cars in the right lane.</p>	<p>While the NPS will consider the first of two comments, this specific request is outside the defined scope of work limits associated with the North Section Rehabilitation Project. The second comment is similarly associated with an area of the Parkway beyond the limits of this rehabilitation project.</p> <p>With that said, the NPS will consider your cited concerns/comments in the overall management and the identification of potential future projects on the Parkway.</p>
3	<p>Please slow slow slow traffic on the GWMP.</p> <p>The road was designed as a scenic drive. The road was not meant to be an expressway. Please review the accident data for the GWMP. Please slow down traffic on the GWMP.</p>	<p>Accident data were reviewed for this study and various safety improvements are being proposed as elements of the NPS preferred alternative action. The currently posted speed limit along this section of the Parkway will remain the same.</p>

4	<p>Please add mile markers! I worked as a 911 call taker and people could rarely figure out where they were in emergencies along the parkway.</p>	<p>The NPS will consider this comment, but the request is outside the scope of the North Section Rehabilitation Project.</p>
5	<p>Hello. My family and I commute on the GW Parkway twice every day. It's a lovely road and we actually enjoy our commute. Great job on the upkeep and beautification of the Parkway!</p> <p>If you are upgrading the GW Parkway between Spout Run and 495, there are three main improvements I think would help.</p> <ol style="list-style-type: none"> 1. Increase the availability of areas for cars to safely pull off the road. Whenever there's any sort of accident, from a fender-bender to something more significant, it causes quite a backup. Usually, cars are able to pull off to the median, but that's not available in quite a few areas. 2. Increase the flow of traffic merging onto the parkway towards DC from 123. In the afternoons, the cars back up well into McLean awaiting their turn to get onto the parkway. It seems you're working on this intersection already, but I wanted to mention this as an issue we see nearly every day. 3. On the parkway heading into the city, consider connecting the merge area from Spout Run to the exit going onto the Key Bridge. There's usually a bit of a backup around that corner in the mornings and afternoons and it seems to me that providing more merge area would help matters. That said, experts may suggest even less merge area from Spout Run. Whatever helps the traffic flow around that bend! <p>Thanks and good luck with your improvements. I really enjoy driving on the Parkway, whether it's a commute or some other reason. We're in Arlington and we use it all the time, from 495 in the north down to Old Town in the South.</p>	<p>(1) As part of this project, the NPS proposes to construct wider stabilized shoulders, which will allow vehicles more space to pull off on the side of the road.</p> <p>(2) Geometric improvement to the Route 123 intersection should assist with these movements. This project is not a capacity expansion project designed to alleviate congestion, but rather one with the primary focus of improving infrastructure condition and enhancing safety.</p> <p>(3) The Spout Run exit onto the Key Bridge is outside the scope of the North Section Rehabilitation Project.</p>
6	<p>For safety's sake, please consider extending the third lane from GWMP southbound at Spout Run to the Roosevelt Bridge exit. It might also help to bank the curves where the GWMP passes under Key bridge.</p>	<p>Extending the third lane on GWMP Southbound at Spout Run to the Roosevelt Bridge exit is outside the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
7	<p>2 comments I have:</p> <ol style="list-style-type: none"> 1. Take this opportunity to extend the Mt Vernon Trail from Roosevelt Island up to 495. The Mt Vernon Trail is very heavily used and could connect in with other trails and neighborhoods along the northern GW Parkway. 2. Create better separation from the Potomac Heritage Trail from the Parkway. The Potomac Heritage Trail is a very nice hiking trail in the area, but some spots are really near the Parkway and are unsafe if young children are hiking on the trail. 	<p>Trail improvements are outside the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
8	<p>The scope should include an alternative to remove the road from the park. There is no reason for a National Park to host a 4 lane commuting highway. I would like to see this section converted to hiking, biking, and riding trails.</p>	<p>Removal of the Parkway is not a viable option and does not meet the project purpose and need.</p>
9	<p>Build an entrance to GWP from Spout Run</p>	<p>A new entrance to Spout Run from the GWMP is not part of the scope of this project.</p>

10	Please, if you can only do one thing to this road, please re-pave it. I am constantly either dodging uneven road left and right, or listening to my tires and shocks absorb so much. More than anything, this road needs to be repaved.	The preferred alternative includes roadway reconstruction and new pavement to improve roadway conditions.
11	Any improvements or rehabilitation to this section of the George Washington Parkway should include rehabilitation and improvements to the Mount Vernon pedestrian and bicyclist trail. Foremost, the trail is in poor repair, with many tree root humps making it increasingly bumpy and dangerous for bicycles, wheelchairs, and strollers. The trail is also too narrow under Memorial Bridge to be safe, and should be redesigned and widened. Moreover, certain sections of the trail should be slightly relocated to higher ground or slightly elevated to limit increased flooding during high tides along the tidal portion of the Potomac River. Further, there should be better grading and drainage alongside the trail to reduce standing water during and after rainfalls. Additionally, there should be lighting to increase safety, especially for female users. There should be safer crossing opportunities. The elevated wooden portion near Roosevelt Island should be redesigned to improve the safety of the intersection with the pedestrian/cyclist trail at the Roosevelt Bridge. Finally, there should be better signage along the trail.	Trail improvements are outside the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.
12	I would like to see parking returned to the trailhead of the Potomac Heritage Trail located off of Crest Lane near Rt. 123 in McLean. There used to be parking but it was removed a few years ago, which made this trailhead difficult to access. The section of the Potomac Heritage Trail from Crest Lane to Turkey Run is a great trail that is quieter and further away from the GW Parkway than the section from Fort Marcy to Chain Bridge, and a few parking spaces would make it easier to access.	Trail improvements are outside the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.
13	I would like to request a repaving of the GW Parkway on the east-bound side between I-495 and Chain Bridge Rd. The road (especially in the left lane) is very rough from years of wear-and-tear.	Roadway reconstruction that includes pavement improvements is part of this project.
14	Please add SPEEDING CAMERAS to the parkway. While it is usually safe, drivers regularly and greatly exceed the posted speed limit.	The NPS will consider your concerns/comments in the overall management of the Parkway. While enforcement of speed limits is not part of the scope of this project, traffic calming techniques will be considered during the detailed design phase of the project.
15	I would love to see a bicycle trail developed from the current end of the Mt Vernon trail in Rosslyn up GW to 495 and beyond. This would open up a whole new artery for green commuters, bike enthusiasts, tourists and families, and connect North Arlington / McLean bikers to DC more efficiently. Thanks for considering.	The NPS appreciates your comments. Trail improvements are outside the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.
16	repair the roads for long term viability add a fifth lane in the middle to go in either direction during rush hour	Increasing the roadway capacity is not part of the purpose and need for this project. The project purpose is roadway and drainage improvements that include some safety improvements.
17	You really must rework the left entrance ramp onto the GW Parkway just after Memorial Circle. It is a death trap. I have seen the number of accidents increase in recent years. It is only a matter of time before someone is killed. If you direct traffic from the left lane to the right lane just before the merge, this will reduce the likelihood of an accident.	Memorial Circle is outside the study area; however, your comment is being considered as part of the Memorial Circle Improvements Project.
18	Get rid of the road completely and replace it with bike and walking trails. Maybe allow buses and emergency vehicles	Removal of the Parkway is not a viable option and does not meet the project purpose and need.

19	<p>As outlined, I believe these are good rehab actions</p> <ul style="list-style-type: none"> • Making drives smoother by replacing the asphalt pavement • Repairing stormwater management systems to keep excess water from damaging the road • Improving safety by strengthening roadside barriers and constructing new concrete curbs • Rehabilitating parts of two historic, scenic overlooks • Lengthening entrance and exit lanes at some interchanges <p>I hope, however, that any changes made DO NOT make it easier for users of the parkway to increase their speed of travel any more than it is now (they go way to fast already).</p> <p>Thank you.</p>	<p>The posted speed will not change as part of this project and the project will not increase roadway capacity.</p>
20	<p>Keep the GW parkway the way it is or as close as possible to the way it is. It is a beautiful parkway and I really enjoy commuting on it every day. There's a little bit of traffic but it's really not that bad. Same thing goes for the Mt Vernon Trail. I really enjoy taking walks on that trail.</p>	<p>It is the NPS intention to use a context sensitive approach that helps to preserve the historic character of the Parkway while making necessary roadway, drainage, and safety improvements.</p>
21	<p>Every evening there is a significant backup at the north end of the GW Parkway leading to the intersection with 495. The entirety of the backup is caused by cars attempting to merge onto the Inner Loop (towards Maryland). Because cars routinely cut the line by merging into the right lane as late as possible, there are frequently also delays in the left lane (for travelers bound for the Outer Loop/Virginia). If there are any options to prevent individuals from cutting into the right lane as late as possible, which slows down traffic in both lanes that can be incorporated as part of this project, your consideration of those options would be greatly appreciated.</p>	<p>Improvements to the existing GWMP/I-495 interchange is not part of the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p> <p>Increasing roadway capacity to alleviate congestion is not part of the project purpose and need. Rather, the primary focus of the project is improving infrastructure condition and enhancing safety.</p>
22	<p>Please pave the George Washington Memorial Parkway between Rt 123 and I495. It has to be the worst road in the NPS system in regards to the deteriorated road surface compared to traffic volume.</p>	<p>Pavement reconstruction and new pavement is part of the preferred alternative.</p>
23	<p>I think all of the planned improvements are exactly what's needed and fully support the effort. However, I have to say that northbound is in better condition than the southbound direction. From the 495 entrance all the way to the TR Bridge, the pavement is teeth rattling. All of the "patches" done throughout the years has actually made the pavement *worse*. Are there any plans to repave GWP in *both* directions? It's embarrassing that a national parkway is in such disrepair. Not a pleasant trip into our nations capital.</p>	<p>Pavement reconstruction and new pavement is part of the preferred alternative.</p>
24	<p>Please make it smoother. It is dangerous and very uncomfortable to drive on in its current condition. Thank you!</p>	<p>Pavement reconstruction and new pavement is part of the preferred alternative.</p>
25	<p>Please ensure that the interstate signs on 495 that indicate George Washington Memorial Parkway are changed from green highway signs to brown location signs; this is a national park unit and should be labeled as such.</p>	<p>Based on public comments, improvements to the existing signage on the Parkway will be considered during final design.</p>
26	<p>To promote the character of place, please ensure that all guardrails on the Parkway are steel backed timber and that all walls are stone masonry.</p>	<p>As part of this project, a comprehensive evaluation of the roadside barriers was conducted to minimize, to the extent possible, changes to the existing historic stone masonry walls. However, for safety reasons, some of the walls will be replaced with concrete core stone-faced guardwalls that meet safety requirements. These walls will be reconstructed using a context sensitive approach and will be in character with the existing Parkway. The NPS does</p>

		propose to replace the temporary W-beam guard rail with steel-backed timber guardrail. More information on the approach can be found on pages 13 through 15 of the EA.
27	Please implement traffic calming so that Parkway traffic is only enabled to travel at speeds no greater than 45 mph.	While changing the currently posted speed limits on the Parkway is not part of the scope of this project, traffic calming techniques will be considered during the detailed design phase of the project.
28	Do not raise stone walls greater than 18 inches above grade.	As part of this project, a comprehensive evaluation of the roadside barriers was conducted to minimize to the extent possible changes to the existing historic stone masonry walls. However, for safety reasons, some of the walls will be replaced with higher 27-inch concrete core stone-faced guardwalls that meet safety requirements.
29	Implement a toll or entrance fee system for so that all visitors using the Parkway coming from the interstate pay a park entrance or amenity fee.	The implementation of a fee is not part of the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.
30	<p>Please, please take this opportunity to make better trail connections in Arlington and McLean between the Potomac Heritage Trail and the trail networks on the far side from the River!</p> <p>The trail connector at Roosevelt Island is very heavily used, and it is too bad that there are no further formal locations for pedestrians, hikers or bikers to cross the GWMP between there and Donaldson Run, and few other connections north of there. It is sad that people who live within walking distance of the River must find a parking spot to get there because of lack of connections.</p> <p>Especially, consider making improvements to trail connectivity *under* the GWMP where bridges already span natural waterways and where trail connections could be relatively inexpensively created.</p> <p>Locations that would be great to connect with safe trails across or under GWMP to the Potomac include: Spout Run; Windy Run/Windy Run Park; Potomac Overlook Regional Park (south side); Savile Lane; Colonial Farm Road; Langley Oaks Park/Turkey Run; Dead Run/Whann Avenue</p> <p>Thank you for your consideration of these ideas.</p>	Trail improvements are outside the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.
31	One of the worst paved roads in the area. This is supposed to be a "parkway" route with great views of nature and the Potomac. Hitting potholes or road imperfections for the entirety of the trip along the parkway between the start and end of the parkway is not acceptable to the taxpayers in Northern Virginia. The amount of road imperfections along this Parkway did not happen overnight, and can only be attributed to negligence by Virginia and the Park Service over a long period of time.	Pavement reconstruction and new pavement is part of the preferred alternative.
32	Please consider including additional landscaped or paved areas which are safe for emergency pull-off of disabled vehicles as well as police stops, etc., which often delay traffic due to lane blockages.	As part of the preferred alternative, the NPS proposes to construct stabilized shoulders to allow vehicles areas to pull over. Also, the proposed action includes emergency turnarounds for emergency and law

		enforcement, as well as for incident management.
33	Extending the Mount Vernon Trail upstream along the George Washington Memorial Parkway at least to Chain Bridge would be an excellent addition. This would enable visitors to make a loop via the Mount Vernon Trail across to the C&O Canal National Historic Park towpath, then downstream through Georgetown, on to the Mall, and then back across the river to the Mount Vernon Trail. Signage along the way about history, to include Theodore Roosevelt Island, would also be a great place for school trips for youngsters to learn about our nation's presidents and our nation's history.	Trail improvements are outside the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.
34	This is a great idea and does not include adding lanes, very thankful! It is a beautiful parkway! To drive through this lovely eco-system is a pleasure (when there is not too much traffic) and that should be preserved, in my opinion. Any attempt to retain the spirit of this drive is worthwhile!	Thank you for your comment.
35	Add an additional lane or separate the lanes on the parkway for 495S and 495N. Or, separate the two lanes with a Jersey barrier divider. Many more cars are heading to MD. Many cars stay in the left lane since it is moving quicker, until the last possible time, and then suddenly stop and attempt to merge into the stopped left lane. This is a very dangerous situation.	The connection to I-495 is not part of the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.
36	I honestly cannot believe there is anything to comment on; this is way overdue. I would think that the effects on commerce and quality of life for the region far outweigh other factors, at this point. This just needs to get done. The current situation is too unsafe because everyone is zigzagging as they drive to avoid large cracks and potholes. I've had numerous close calls. Please expedite.	Thank you for your comment.
37	Dear NPS, I am an admittedly infrequent user of the George Washington Parkway however I would like to urge you to make two important safety improvements. First, lengthen entrance and exit ramps, especially entrance ramps to make them safer. There is currently inadequate time to reach travel speeds and safely merge into traffic at many interchanges. Second, improve the directional signage on the Parkway. It is particularly bad near the Memorial Bridge but other locations could use improvement as well. Even if you continue to use non-standard highway signs, they need to be larger and more frequent. I realize that you are running a parkway but in reality it is a major highway and should be viewed more in that light. You might also consider bringing speed limits into closer alignment with average driver speeds. Right now there is a pretty large difference between the posted speed and the speed most drivers are driving at. You should examine what steps can be taken to decrease the disparity.	The proposed action proposes lengthening some of the entrance and exit ramps. Based on public comments, improvements to the existing signage on the Parkway will be considered during final design. There are no plans to change the speed limits on the Parkway as the current Parkway design is not adequate for speeds greater than 55 mph.

38	<p>Hello,</p> <p>When my family and I visited the GWMP, we highly enjoyed our time. However, we found the signage near the LBJ Memorial Grove to be inadequate to get us back onto the GWMP heading downriver.</p> <p>Please consider improving your signage in this area.</p>	<p>Improvement to signage along the Parkway is not part of the scope of this project and the LBJ Memorial Grove is not within the study area. However, the NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
39	<p>I commute on GW Parkway downtown from McLean nearly every day. I fully support the rehabilitation project. I would favor options that 1) preserve the magnificent views even at the expense of faster speed limits, and 2) enhance the safety and efficiency of on and off-ramps at the 123 intersections. Most importantly, however, I would ask that the NPS seriously consider installing a bike path along GW Parkway during this rehabilitation project so that McLean residents have a safe way to commute downtown via bicycle. PLEASE consider installing such a bicycle path from the 123 intersection to Roosevelt Island. This would alleviate the horrendous traffic congestion along the parkway during rush hour, because I believe that such a path would be quite popular. Such a path would also allow bicycle commuters to more fully enjoy the magnificent views. It would be an incredible enhancement to the bicycle path network in the DC area.</p>	<p>Construction of a bike path is outside the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
40	<p>Thank you for rehabilitating the George Washington Parkway. Please consider saving money by not adding the ITS infrastructure system. I would also like the existing stone roadside barriers to be left alone even if that means they do not meet current safety standards. Please also avoid replacing on-off ramps with intersections that require traffic lights.</p>	<p>The NPS wants to take advantage of installing the ITS infrastructure while the roadway reconstruction is occurring to minimize future cost and impacts to install such infrastructure. The cost of this installation will be far less than a future standalone project.</p> <p>As part of this project, a comprehensive evaluation of the roadside barriers was conducted to minimize, to the extent possible, changes to the existing historic stone masonry walls. However, for safety reasons, some of the walls will be replaced with 27-inch concrete core, stone-faced guardwalls that meet safety requirements.</p>
41	<p>This action is way too late in coming. The state of the GW parkway's pavement is truly atrocious. I would compare it to 3rd world countries. I'm not even sure why there should be an EA to do this. Other counties don't do EA's before replacing bridges and roadways. Since this is an already existing roadway, NEPA should've been satisfied by categorical exclusion and work should've started on this already.</p> <p>I heard about this from the construction sign posted on the roadway during my daily commute. This is not one of the checkbox options below but is a good way to reach a lot of people on their daily commute.</p>	<p>Thank you for your comment.</p>
42	<p>The entrance from the Parkway onto 495 into Maryland, should be TWO lanes. In evening rush hour and at other times the backup is before the CIA. Barely any traffic takes the VA entrance to 495, yet that is two lanes.</p>	<p>The connection to I-495 is not part of the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
43	<p>If you're going to be working on the north end of the parkway the project should also include an extension of the bike trail from the key bridge all the way to the northern beltway.</p>	<p>Trail improvements are outside the scope of this project.</p>

44	<p>The planned construction activities will have a "major impact" on traffic patterns and will likely cause a significant increase in traffic delays.</p> <p>Will the planned construction be performed on a 7 x 24 basis to minimize the negative impact on users of the parkway and all other commuters who will be effected?</p>	<p>A traffic management plan that includes public outreach will be developed and implemented to help minimize impacts. The plan also will identify construction periods and work hours for construction.</p>
45	<p>I use the northern half of the GW Pkwy on my commute. It is in disrepair (potholes, bumps, cracks) and unsafe. It has no shoulders. Southbound, it loses a lane at Rt 123- -dangerous- -and delay-inducing. And now with the tolls on I-66, the Pkwy is seeing even more traffic. Please, please, please reconstruct the road surface and improve the Rt 123 interchange so we don't lose a lane. I can't believe it's been 50 YEARS and this still hasn't been done.</p>	<p>Pavement reconstruction and new pavement is part of the preferred alternative. The preferred alternative recommends minor geometric modifications to the GWMP/Route123 interchange, which provide both a second southbound through-lane on the Parkway and improve the ramp connection points.</p>
46	<p>I frequently use the GW Pkwy to travel from DC (WNY) to NSWC Carderock. I hope to God the new design will include actual shoulders. Parkway is nice & pretty, but it's a disaster if anyone happens to have a problem. Back-ups from wrecks are frequent and significant. Acknowledge that this road is a major east-west throughfare, and the only road that connects the east & west sides of the Beltway in the updated design. It should be designed for at least a 55 mph speed limit. There are no residences on the road, few pedestrians and it's limited access it is a pseudo-interstate. Treat it accordingly.</p>	<p>Thank you for your comment. The reconstruction of the Parkway will include stabilized shoulders.</p> <p>The proposed action is to rehabilitate an existing roadway to maintain the road surface for safety. This project will not increase speeds or the capacity of the Parkway.</p>
47	<p>Agree that the parkway work is long overdue but worried about the combination of the people avoiding I-66 toll road and construction causing major delays. I hope you will consider this in your timing for lane closures.</p> <p>The main sticking points are where people exit for bridges. The worst may be the Key Bridge. It would be good to lengthen that exit.</p> <p>Also the spout run exit could use some evaluation for traffic solutions as well. It slows down significantly there in the evenings.</p> <p>Thanks for your consideration.</p>	<p>A traffic management plan that includes public outreach and coordination with FHWA, VDOT, DDOT, and the Arlington and Fairfax County DOTs will be developed and implemented to help minimize impacts on the travelling public. The plan also will identify construction periods and work hours for construction.</p> <p>The recommendations regarding Parkway connections at Key Bridge and Spout Run are outside the defined scope of work limits associated with the GWMP North Section Rehabilitation Project. With that said, the NPS will consider your cited concerns/comments in the overall management and the identification of potential future projects on the Parkway.</p>
48	<p>I understand safety is critical but would add that based on the effort to stage all this work the park service. Seriously consider additional modifications to permit more traffic to flow through as even with the popularity of "alternative modes" of transportation I am confident this road will continue to handle more and more traffic each year. I also hope there will be clear, easy timely instructions from more than one source on where and when the work will be performed and what portions of the road are not functioning normally. Thank you.</p>	<p>Traffic capacity expansion is not part of the scope of this project; the primary focus is improved pavement condition and safety.</p> <p>A transportation management plan will be prepared for this project, which will detail public outreach during construction as well as specify the contractor traffic control requirements.</p>

49	<p>I support the project and effort to improve the GW Parkway. This is a road that I learned to drive on, and love to drive on. My hope is that you make some of the on- and off-ramps more safe, particularly off 123. Please maintain the beauty and serenity of this important and historic road.</p> <p>One thing I will note is that while driving on it the other day, a construction sign was up warning drivers of construction ahead. The sign read "Summer closures ahead, plan for delays this summer". This is a very confusing sign. Are you closing parts of the parkway for the summer? Just for the heck of it? I came here to this site to read about what might be going on and for how long. However, the closures clearly have nothing to do with this effort, since you openly say it's unfunded and is only in the planning stage. If you are in the planning stages only, why would you close lanes during the busy DC summer? Shouldn't that only occur for active work sites? I understand that regular maintenance needs to occur, but typically that wouldn't shut parts of the road for the whole summer. It was odd.</p> <p>Please go about this in an open way. The WTOP article, and this summation of what would be done is very vague, with no time line attached. It's difficult to even react to it.</p>	<p>Thank you for your comments. It is the NPS intention to use a context sensitive approach that helps to preserve the historic character of the Parkway while making necessary roadway, drainage, and safety improvements.</p> <p>In addition, a traffic management plan that includes public outreach will be developed and implemented to help minimize impacts. The plan also will identify construction periods and work hours for construction.</p> <p>The traffic management plan currently being used for the rehabilitation of the Windy Run Bridge along the Parkway is an example of the potential strategies which may be applied to the larger Parkway rehabilitation project.</p>
50	<p>I read about this story on WTOP website. My main issue with the GW parkway is the storm drains on the side of the road. If it is possible, please move them off the actual road and place them adjacent to the road. My vehicle's front end has taken a beating from driving over these drains over the years. That's my 2 cents. Thank you.</p>	<p>Thank you for your comments. Moving the storm drains out of the roadway is a consideration associated with the NPS preferred alternative action.</p>
51	<p>As a daily commuter who takes GW parkway in and out of the DC area. I would love to see another lane for MD drivers going North to get onto 495. It is very disrupting to the flow of traffic when the rude MD drivers drive all the way to the end and then hold up traffic not only going onto 495 towards MD, but they also hold up the VA drivers trying to get to 495.</p> <p>I strongly believe there are more drivers heading towards MD than VA, so why do VA drivers need two lanes? I believe if you did this, it would alleviate a lot of the traffic build up to 495 towards MD.</p> <p>Either this or have the police stay there at the exit area every day to make sure that the rude MD drivers are not allowed to hold up the line of traffic that the MD drivers who follow directions have to sit in every day</p> <p>Thanks for listening!</p>	<p>Increasing the roadway capacity at the GWMP/I-495 interchange is not part of the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
52	<p>For homes overlooking the parkway, the vastly increased volumes of traffic have rendered the road-noise level from the parkway unbearable. I would ask that the Parkway authorities consider sound barrier walls (certainly in the areas just north of Spout Run) along the Southbound side of the Parkway to help reduce the level of road noise. This technique is used all along our national highways and would be very effective in reducing the road noise in areas where homes are located near the parkway.</p> <p>Thank you for your consideration.</p>	<p>The GWMP North Section Rehabilitation Project will not be increasing the capacity of the roadway or contributing to additional noise. Noise walls are not advisable on the Parkway because they would have unacceptable impacts to the historic parkway. The Parkway was developed as a scenic parkway to help preserve the Potomac River Gorge and shoreline.</p>

53	<p>Please consider:</p> <p>The exit (3rd) lane at the northern end of the GWP to I-495/Maryland needs to be opened up at least a 1/4 mile more to avoid the huge backups currently being experienced in the afternoon. Too many people use the left lane since they are impatient and then cut back in toward the end and cause safety issues and angry drivers.</p> <p>I am glad to see the other improvements around 123 being proposed.</p>	<p>Improvements to the existing GWMP/I-495 ramps are not part of the project scope. Also, increasing the roadway capacity is not part of the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
54	<p>Are there any plans to make the southern end of the parkway safer? Adding a divided grass median where the GW crosses at Morningside Drive, and Belle View Blvd is long overdue.</p> <p>Thanks,</p>	<p>There are no identified plans for physical changes to the southern end of the Parkway at this time. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
55	<p>Why can't any of this work be done at night? Other construction projects do and there is little impact to traffic</p>	<p>A transportation management plan will be developed that will identify construction times and phasing. It is likely that some of the work associated with this rehabilitation project could occur at night.</p>
56	<p>As a daily commuter who uses the GWP, I urge you to include a complete re-paving project for the northern portion in both directions of the parkway. Countless number of potholes, sewer misalignment, a cracked pavement areas makes the daily journey challenging on all car tires and suspension.</p> <p>I have traveled this route for over 30 years, and with the exception of an occasional pothole filling, or tree removal from storm damage, little maintenance has been done to the roadway.</p> <p>I applaud the park service to finally get to dealing with this much needed repair project.</p> <p>Thanks, and good luck.</p>	<p>Thank you for your comment. Pavement reconstruction and new pavement is part of the preferred alternative. It is the NPS intention to use a context sensitive approach that helps to preserve the historic character of the Parkway while making necessary roadway, drainage, and safety improvements.</p>
57	<p>The merge on the Southbound GWMP right after the exits for Chain Bridge (123) is not dangerous, but not good. I read that you will be extending the lanes for this, which is a good idea. This morning, someone wasn't merging correctly and almost caused an accident.</p> <p>But the place that causes the largest backup Southbound between 495 and Spout Run is the Spout Run entrance to GWMP. I don't know why, the merge goes well there, but the traffic is usually backed up 1-2 miles during rush hour.</p> <p>For future reference, the entrance to Northbound I-395 (including the merge onto I-395) from Southbound GWMP is lousy, with the entrance from SB I-395 and the backup from the NB entrance.</p> <p>Thank you for reviewing the comments and the road, and anything you can do to not hinder rush hour would be appreciated.</p>	<p>Thank you for your comments. Pavement reconstruction and new pavement is part of the preferred alternative. The preferred alternative recommends minor geometric modifications to the GWMP/Route123 interchange which provide both a second southbound through lane on the Parkway and improve the ramp connection points.</p> <p>The two recommendations regarding Parkway connections at Spout Run and I-395 are outside the defined scope of work limits associated with the GWMP North Section Rehabilitation Project. With that said, the NPS will consider your cited concerns/comments in the overall management and the identification of potential future projects on the Parkway.</p>
58	<p>While this project is all good and fine, and most likely makes perfect sense, many of us would prefer that a priority be placed on fixing the existing roadway before anything else. Long sections of the parkway appear to have not been repaved in decades, and the result of that neglect is telling, with "spider</p>	<p>Thank you for your comment. Pavement reconstruction and new pavement is part of the preferred alternative.</p>

	<p>webbed" asphalt everywhere that leads to constant potholes and dangerous driving conditions. Enough with the "improvements" and more focus on the basic roadway maintenance - that should be the priority for funding....</p>	
59	<p>Please do as much of the work as possible at night. Make the contractors adapt.</p> <p>In addition to the "commute", this work will have a bad effect on access to DCA, which is generally time sensitive.</p> <p>Having a special URL with accurate real-time traffic information (and cameras) would be very helpful.</p> <p>Thank you.</p>	<p>A transportation management plan will be developed that will identify construction times and phasing. It is likely that some of the work could occur at night. The transportation management plan will include a public outreach component to notify users of the Parkway of construction detours and delays. Real-time information will be considered in the transportation management plan.</p>
60	<p>While these improvements are nice, what would really be great is to 1) repave the whole Parkway from Spout Run to the Beltway and 2) widen it at the Beltway North terminus to create an extra exit lane for traffic heading to MD. These other items can wait.</p>	<p>Thank you for your comments. Pavement reconstruction and new pavement between Spout Run and the Capital Beltway is part of the preferred alternative.</p> <p>Improvements to the existing GWMP/I-495 ramps are not part of the project scope. Also, increasing the roadway capacity is not part of the scope of this project. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>
61	<p>Why another project to get us to the traffic jams faster without taking care of the jams? We're still going to be backed up 3-5 miles in the morning because of the exits after Spout Run ... and 3-5 miles in the afternoon before the I-495 North exit because the traffic leading to the bridge is so-messed up. What you're proposing just gets us to the jams faster and will make the jams longer and bigger ... just like the work on the beltway changes at Tyson's Corner did.</p> <p>It's absolutely amazing how the government can spend so much money on roads and do nothing to free up traffic. I (and a lot of other people) spend an EXTRA 90 minutes a day, 7.5 hours a week, or 390 hours a year (that's equivalent to more than 2 months at work each year) in traffic jams.</p> <p>It's sad to see the Park Service becoming like Politicians. I used to think you were more intelligent. Now I guess you're also just all sizzle and no steak!!</p>	<p>The proposed action is to rehabilitate an existing roadway to maintain the road surface for safety. This project will not increase speeds or the capacity of the Parkway.</p>
62	<p>I know this is out-of-scope, but I think the Park Service should consider adding a bicycle path along GW parkway north of Theodore Roosevelt Island to the Beltway, and connect this trail to the adjacent neighborhoods. Personally, I'm not a bicyclist, but this would be a terrific addition to the park system, encouraging more people to commute this way and also encouraging a healthier lifestyle. South of Roosevelt Island, the bike path gets a ton of use, much like Rock Creek does. A bike/pedestrian path would add a lot to the quality of life in the area. So, when planning improvements to the Rte 123 interchange, keep bike/ped in the design so it'll be easier & less expensive to accommodate a bike path through that interchange in the future.</p>	<p>Thank you for your comment. The NPS will consider your concerns/comments in the overall management and future projects on the Parkway.</p>

63	<p>Good Morning, I am happy to hear that there is work being done on the parkway to improve safety and improve the roadway. With that being said I am pleading with the NPS to either resurface the length of the roadway especially coming to and from the beltway or make significant repairs. The wear and tear on vehicles is absurd and with the winter months coming around the corner the roadways become even more hazardous.</p> <p>Thank you for your attention to this matter.</p>	<p>Pavement reconstruction and new pavement is part of the preferred alternative.</p>
64	<p>The condition of the GWMP continues to deteriorate and has reached a point of becoming more and more unsafe. I have travelled this road in my daily commute to work for the past 30 years and I have never seen it as bad as it is. Every day I witness near accidents as vehicles almost sideswipe each other as they swerve or travel the middle of the road in order to avoid the rough, choppy pavement that has been patched and continues to be pot hole ridden. Rainy weather causes ponding and more pot holes and the cycle continues. We have been fortunate the last couple of years to have experienced a relative lack of snow but cold, ice and snow combined with salt, sand and plows exacts an even larger toll on the condition of the roadway.</p> <p>I admire effort expended by crews trying to patch the roadway but a few shovelfuls of hot patch tamped down by hand with a shovel or tamper is a joke and does nothing but delay traffic.</p> <p>What is ludicrous is the idea that this road will not be rehabilitated until 2020. By then certainly this will resemble a road slightly better than a third world goat cart track.</p> <p>Is there no way to prioritize this effort or streamline the process? the safety of the commuting public is at stake.</p>	<p>Thank you for your comments. Pavement reconstruction and new pavement between Spout Run and the Capital Beltway is part of the preferred alternative.</p> <p>The NPS and FHWA are seeking ways to obtain funding to advance the project in a timelier manner.</p>
65	<p>The worst part of the GW parkway besides the potholes is the exit signage is poor. It just says "EXIT," but not what the exit is. Do is like the interstates. For example:</p> <p>"Exit: Route 123 McLean/Rosslyn"</p>	<p>Based on public comments, improvements to the existing signage on the Parkway will be considered during final design.</p>
66	<p>Please do as much as possible to keep the scenic nature of the parkway intact.</p> <p>Among other concerns, do not allow any large vehicles on the parkway.</p> <p>Do not install any shiny or metallic metallic structures.</p> <p>Add but limit lighting to what is necessary for safety, and ensure that the bulbs are the most efficient available and are strictly downward firing. That is, no acorn lights or other unshielded lights.</p> <p>No traffic signals. Minimal signage. Remove and replace, as may be necessary, ugly metal guard rails. Install native plantings and trees. Install road surfacing that is noise abating.</p>	<p>Thank you for your comments. It is the NPS intention to use a context sensitive approach that helps to preserve the historic character of the Parkway while making necessary roadway, drainage, and safety improvements. The appropriate treatment decisions will be guided by historic preservation planning documents identified under the Programmatic Agreement in consultation with the VDHR.</p>
67	<p>I appreciate the Park Service looking at this section of GW Parkway for improvement. My comments solely have to do with the interchange with 123/GW as I am supportive of the rest of the plan.</p>	<p>With regard to the suggested changes to the GWMP/Route 123 interchange western connection, the NPS and FHWA initially considered the recommended approach, but the approach was dismissed because of</p>

	<p>I disagree with the changes proposed to the western connections to GW from 123. Specifically, the removal/change to the off ramp from southbound GW, and the removal of the on ramp from north bound 123 on to southbound GW. While I understand the geometry may not be ideal, neither of these spots frequently back up, and thus think both should remain. I do think the off ramp should be extended so that it merges with 123 after the light at 123 and Kirby Rd to prevent the attempts to merge and immediately turn (which is clearly marked illegal). This would allow the traffic an easier opportunity to merge as it would not have to stop at the light.</p> <p>For traffic coming south on 123 merging on to south bound GW, this area frequently backs up during both rush hours. The traffic light timing at Kirby Rd should be examined as a near term cost free solution. Additionally, both lanes of 123 should turn onto GW parkway vs the one lane that currently does. Back ups along 123 are already partly caused by traffic trying to jump the line in the left lane and then merge in right before the on-ramp. If both lanes merged onto GW parkway (and merged down into one lane on the on-ramp before actually merging onto GW) the throughput of cars would be increased and the unsafe last minute merging could be removed. The left lane could then also have an option to continue straight on 123 towards Chain Bridge, as this does not frequently back up.</p>	<p>potential negative environmental impacts and the need for the acquisition of additional right-of-way.</p> <p>With regard to the southbound Route 123 traffic concerns, the NPS and FHWA will consider the suggested approach during final design and coordinate with VDOT, as the NPS does not have jurisdictional authority to modify this traffic signal.</p>
68	<p>Please preserve the present appearance of the Parkway, in terms of narrow shoulders, low curbs, and grass right up to each curb.</p>	<p>Thank you for your comment. It is the NPS intention to use a context sensitive approach that helps to preserve the historic character of the Parkway while making necessary roadway, drainage, and safety improvements.</p>
69	<p>I lived in The Dogwoods, the neighborhood immediately to the east of the the George Washington Memorial Parkway & 123 Interchange. As such, I am intimately familiar with the interchange, and the barrier and safety hazard it poses to non-automotive forms of transportation (namely walking and biking) who seek to cross the interchange. It is a non-American with Disabilities Act (ADA) compliant barrier and safety hazard both for those accessing the surrounding neighborhoods, traveling along the corridor, as well as those accessing the NPSs Potomac Heritage Trail (PHT) and Fort Marcy Park facilities.</p> <p>There are existing pedestrian facilities (sidewalks) on the 123 bridge over the GWMP, and bicyclists are legal roadway users on 123. As someone who lived nearby, I can affirm that both pedestrians and bicyclists cross the interchange today. With regard to the pedestrians who cross the interchange, some are low-income service workers in the surrounding neighborhoods who, for economic reasons, have no choice but to walk.</p> <p>The Environmental Assessment (EA) fails to even mention the needs of non-automotive users of the interchange. This is in violation of the NPSs Management Policies 2006 (9.2 Transportation Systems and Alternative Transportation), which state management decisions regarding transportation facilities require a full, interdisciplinary consideration of alternatives; no consideration of transportation alternatives has been discussed with regard to this interchange. The policy goes on to say that the NPS will emphasize and encourage alternative transportation systems with a preference for non-motorized modes of access. If anything, the EA deemphasizes</p>	<p>The Route 123 bridge and pedestrian facilities on the bridge and along the road are not under the jurisdiction of the NPS, as Route 123 is part of the Virginia State roadway system. The NPS proposes modifications to the ramps connecting the Parkway mainline roadways to Route 123. As noted on page 18 of the EA, any modification to the road/ramp intersections with Route 123 requires review and approval by VDOT. In February 2018, a conditional approval of the Interchange Modification Report prepared by NPS and FHWA was received from VDOT. The NPS and FHWA are working cooperatively with VDOT to enhance the safety of the interchange elements within NPS purview and provide a mutually acceptable reconfiguration regarding Route 123 ramp terminal intersections and lane widths. Changes to the bridge or existing sidewalks along Route 123 are not part of the proposed project as these roadway elements fall within the VDOT right-of-way. The NPS will share these comments with VDOT.</p> <p>The NPS will continue to coordinate with Fairfax County with regard to their bicycle and pedestrian trail transportation plans. To date, the County has expressed no concerns that the NPS plans would prohibit future plans. Any proposed changes to the existing</p>

<p>alternative, non-motorized modes of access by ignoring them entirely.</p> <p>The EA fails to meet the NPSs Management Policies as they relate to persons with disabilities (9.1.2 Accessibility for Persons with Disabilities), which state The Service will design, construct, and operate all buildings and facilities so they are accessible to and usable by persons with disabilities to the greatest extent reasonable. The existing sidewalk facilities do not meet current ADA standards. By altering the interchange, the NPS is legally obligated to bring the existing pedestrian facilities up to ADA standards. With no discussion of the existing ADA non-compliance issues of the interchange, the EA fails to meet the above policy.</p> <p>The EA fails to meet the projects own stated purpose and need. Per the EA, the project is being undertaken to implement safety improvements, however neither the EA itself nor the proposed interchange design address safety for non-motorized modes of transportation - modes that currently do use the interchange.</p> <p>The EA fails to address Fairfax Countys existing transportation plan. The 2014 Countywide Bicycle Master Plan shows a future shared use path crossing the interchange, while the 2014 Countywide Trails Plan shows future major paved trails (8 feet) crossing the interchange on both sides. The proposed design, requiring uncontrolled crossings of high-speed ramps and slip-lanes on both the north and south side of the interchange, is incompatible with both these plans.</p> <p>The EA purpose and needs statement, along with the rest of the EA (including proposed designs), should be revised to:</p> <ol style="list-style-type: none"> 1. Acknowledge that non-motorized forms of transportation currently pass through the interchange 2. State that the project will seek to encourage non-motorized forms of transportation, as is required by the NPSs Management Policies. Non-motorized transport should be encouraged both in general and specific to those visiting the NPSs PHT and Fort Marcy Park facilities. Currently, the interchange acts as a barrier to all non-motorized transportation visitors seeking to visit these facilities from the west due to the lack of pedestrian and bicyclist facilities, and the high-speed on- and off-ramps from GWMP. 3. State that persons with disabilities shall be provided with ADA-compliant paths of travel through the interchange, from one extent of the NPSs property to the other, as is required by the NPSs Management Policies. 4. Explicitly state that the project will implement safety improvement for all users of the interchange, including pedestrians, bicyclists, and motorists. 5. State that the project design will accommodate Fairfax Countys Bicycle and Trails plans with respect to the GWMP & 123 interchange <p>To meet the NPSs own Management Policies, comply with ADA regulations, and accommodate Fairfax Countys transportation plans, the design of the interchange should incorporate the</p>	<p>vehicular, bicycle, and pedestrian circulation patterns within the GWMP/Route 123 interchange area will require coordination between NPS, FHWA, VDOT, and Fairfax County.</p>
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following elements and recommendations:

- Most importantly, an ADA-accessible pedestrian path of travel should be provided through the entire east-west extents of the NPS property at the interchange. This can be accomplished by constructing asphalt multi-use paths that connect to the existing bridge sidewalks from the east and west. The multi-use paths should be designed to accommodate bicyclists as well, if feasible.

- If feasible, accessible east-west paths of travel should be provided on both the north and south sides of the interchange, in accordance with Fairfax Countys Trail Plan. If not, at a minimum, a path of travel should be provided on either the north or south side. The south side would better accommodate connections to Fort Marcy, and avoids the conflicts created by the high-speed on- and off-ramp slip lanes in the northeast quadrant of the interchange.

- At no point should pedestrians or bicyclists have to cross uncontrolled or yield-controlled on- or off-ramps or slip lanes. All on- and off-ramps to and from the GWMP should meet 123 at a 90 degree angle, with turn radii minimized to the greatest extent possible to slow down vehicles as they turn across pedestrian and bicyclists paths of travel. At peak hours, traffic already moves at a stop and go pace, so vehicles would not need to slow down any more than they already do when congestion is of most concern. For example, based on Figure 9, the Preferred Option appears to retain the high-speed on-ramp from EB 123 to SB GWMP, and high-speed off-ramp from SB GWMP to EB 123 (they are not marked as roadway to be removed). This could easily be made into a pedestrian and bicyclist-friendly design by removing the on-ramp and instead continuing the right-most EB 123 lane as a standard right-turn only lane up to the proposed signalized intersection (similar to Option 2), where vehicles would make a low-speed, 90 degree right turn onto the newly proposed on-ramp. The curve in the off-ramp should also be removed and instead meet 123 at 90 degrees. Or alternatively, all SB GWMP traffic heading both east and west on 123 could use the proposed SB off-ramp. With either of those two options, all EB and WB traffic from 123 to SB GWMP, and all SB GWMP traffic to 123 would meet at a single, signal-controlled intersection, that pedestrians and bicyclists on the south side of the interchange could cross in a single phase. As proposed, the design on the south side requires crossing an uncontrolled high-speed on-ramp, a signal-controlled on-ramp, followed by an uncontrolled high-speed off-ramp.

- The new proposed yield-controlled SB off-ramp in Option 1 should instead be controlled by the signal. Yield control implies an unsafe slip lane design, and motorists will only be looking to the right for on-coming WB 123 traffic, even though pedestrians may be coming from the left, putting pedestrians at risk. This is particularly true if an accessible path of travel is provided on the north side.

-The scope should be expanded to include the reconfiguration of the on- and off-ramps in the northeast quadrant of the interchange. The EA describes these as tight, however both the on- and off-ramps include wide-radius slip lanes that encourage entering and exiting at high speeds, endangering pedestrians and bicyclists. At the very least, these ramps

	<p>should have the slip lanes removed, so all movements are made at low-speed, 90 degree turns. To maximize pedestrian and bicyclist safety, these ramps should be signaled controlled, timed in coordination with the proposed signal to the west. If a signal is not feasible, at a minimum the slip lanes should be removed and the on and off-ramp lane consolidated to meet 123 at 90 degrees.</p> <p>-The reconfiguration of the NB on- and off-ramps would allow for the realignment of the Potomac Heritage trail so that it comes up to 123 and crossed in a new marked crosswalk just west of the consolidated on- and off- ramps. Signal control would allow for a safe, conflict-free crossing and could be pedestrian-actuated to minimize vehicle delay. After crossing 123, the trail would continue back down between the NB on-ramp and Crest Lane to the current alignment. This would eliminate the EXTREMELY dangerous and frankly bizarre existing crosswalks across the high-speed NB on- and off-ramps. These crosswalks were referred to by one website as the Most Useless Crosswalk Ever. The fact that there isn't even a hint of a goat trail/desire line in the median between the crosswalks shows how completely unused they are - no major trial should ever cross such high-speed ramps.</p> <p>The NPS has a reputation for managing it roadways more like a state highway department than a park service, prioritizing high-speed vehicle movements over pedestrian and bicyclist's safety and enjoyment of the natural environment. This is in violation of both the spirit of the NPSs mission, and its own governing policies. The reconfiguration of the GWMP & 123 is a chance to undue this perception; however, major changes to the EA and proposed design will be needed to do so.</p> <p>These comments will be forwarded to the appropriate local, state, and federal representatives.</p>	
70	<p>Loudoun County requests that the National Park Service include a study of the diverge at the I-495 NB and SB split, at the northern end of the study limits, to evaluate the benefits of an earlier channelization of the NB and SB traffic. The I-495 SB Virginia bound traffic appears to be lighter than the I-495 NB Maryland bound traffic, and channelizing these movements before the existing diverge could reduce delay for those looking to use I-495 SB lanes.</p>	<p>Modifications to the existing GWMP/I-495 off and on ramps are not part of the scope of this study. The NPS will consider this request in the overall management and future projects on the Parkway.</p>
71	<p>I know this is going to be a painful project for those of us who use GWMP regularly, but I think we can all live with some construction for a rebuilt Parkway. I would like to comment on potential operations for the rebuilt GWMP: in the cross section, there is a 6 foot unpaved shoulder, which is sufficient for most broken down vehicles to pull off the roadway. However, I don't think that it is clear to motorists that in the current configuration that they can mount the curb and move a disabled vehicle to the unpaved shoulder. NPS should explore signage or some sort of marker to better convey this to drivers (we all know a crash, even in one lane, can cripple the Parkway). In that vein, it would also be useful for emergency vehicles if drivers would pull to either side's curb and let emergency vehicles "split the lanes". NPS should work with FHWA to allow pavement markings of some sort (a Request for Experimentation to the MUTCD, perhaps?) to show drivers where to pull to the curbs in traffic (this is common practice in many countries on multilane roads</p>	<p>Thank you for your comments. It is the NPS intention to use a context sensitive approach that helps to preserve the historic character of the Parkway while making necessary roadway, drainage, and safety improvements.</p>

	<p>without shoulders, but may be new for American drivers). Thanks for your thorough work in this complicated project!</p>	
72	<p>Thank you for the opportunity to review and comment on the June 2018 Environmental Assessment (EA) for the George Washington Memorial Parkway (GWMP) North Section Rehabilitation. The project incorporates a number of improvements intended to upgrade the north and southbound lanes, make drainage improvements, and improve safety along the 7.6 miles of Parkway between Spout Run and the Capital Beltway (Interstate 495). A proposal for the rehabilitation was previously analyzed in an EA released in 2008; however due to public and agency concerns it was determined more information was needed. In the intervening years, the National Park Service and Federal Highway Administration worked together to complete several studies regarding vehicular safety, cultural landscapes, and scenic resources before updating the project alternatives. In this EA, Alternatives A and B were considered. Alternative A was presented as a "No Action" alternative with Alternative B noted as the "Preferred Alternative."</p> <p>The EA identified a number of benefits resulting from the improvements noted for Alternative B. These improvements include 1) reconstructing the pavement and adding new curb and gutter; 2) replacing and adding drainage inlets and culverts; 3) stabilizing erosion at drainage outfalls; 4) improving safety along the Parkway; 5) improving roadside barriers; 6) reconfiguring the Route 123/GWMP interchange; and 7) a variety of other improvements to the Parkway, including short extensions of acceleration and decelerations lanes, adding emergency turnarounds, and installing stormwater facilities to Virginia Department of Environmental Quality (VDEQ) requirements. Much of the work proposed in Alternative B appears to fall within areas that have been previously disturbed for the original construction of the GWMP as well as during past rehabilitation projects. Short-term impacts during construction activity are identified as mitigation measures to ensure most adverse long-term cumulative impacts are minor and in some cases long-term benefits will be provided.</p> <p>Archaeological/Heritage Resources Impacts</p> <p>The GWMP is listed in the National Register of Historic Places (NRHP) for its commemoration of George Washington as well as for the landscape architecture of its design. Hundreds of individual archaeological sites exist within the Parkway's extensive acreage. Numerous surveys, as noted in the EA, have identified many archaeological sites. Much of the Parkway, however, remains unsurveyed with a high potential for new sites to be identified. The Fairfax County Park Authority (FCPA) would recommend that an initial archaeological survey be performed for areas within the limits of disturbance that have not been subject to previous archaeological investigation. Subsequent Phase II archaeological testing and Phase III data recovery should be provided as necessary.</p> <p>In the interest of building upon shared knowledge, the FCPA would appreciate the opportunity review any previous and future archaeological surveys to further understand the history of Fairfax County. As possible, please share any archaeology reports as well as field notes and photographs with the FCPA's Archaeology and Collections Branch</p>	<p>The NPS will continue coordination with Fairfax County as design progresses.</p> <p>The NPS will review whether the Rokeby property located at 800 Dolley Madison Boulevard will be affected by the proposed action. At this time, the property is outside the area of potential effect for the project.</p> <p>In addition, an archeological survey will be completed prior to construction under the Programmatic Agreement and the Archeological Resource Protection Plan developed in consultation with the VDHR.</p> <p>Based on NPS implementing regulations for NEPA found in Director's Order #12 and guidance provided in the NPS NEPA Handbook (2015), the NPS is preparing focused and concise EAs centered around issues identified during the project scoping phase. It has been determined that any potential impacts to the cited watersheds is negligible and would result in a net benefit. The NPS will further coordinate with Fairfax County about County infrastructure within the proposed limits of disturbance as well as future plans.</p> <p>The NPS and FHWA will coordinate with the Fairfax County Department of Transportation and VDOT in the development of the transportation management plan.</p> <p>Lastly, the comment stating that "... clarification should be provided on whether a new traffic signal is proposed at this interchange. Figure 9 on page 19 shows a proposed signal for Option 1 at this location, while the description on page 75 states that no additional traffic signal will be required..." appears to have identified an error in the EA in need of correction. The travel demand analysis and the Interchange Modification Report conducted as part of this most recent EA development did indeed identify the need for a new traffic signal installation at the location shown on Figure 9 for Option 1.</p>

(Attention: Liz Crowell). Materials can be sent to 2855 Annandale Road, Falls Church, VA, 20110.

Stone masonry guard walls along the shoulders and the median are the predominant type of barrier along the GWMP and contribute to its historic character and listing in the NHRP; however they do not meet current FHWA safety standards and as such need to be selectively replaced. Staff agrees with the recommendations put forth in the EA for mitigation of the stone guard walls in regards to safety measures. Excellent analysis was completed to determine which guard walls to remove, replace, and rehabilitate. Staff further agrees with the methodology to reinforce the existing guard walls to meet safety standards and to reuse the existing stone from the guard walls where feasible to preserve the historic character.

Fairfax County Heritage Resources staff notes that there is a property listed on the Fairfax County Inventory of Historic Sites located to the northwest of the proposed Route 123/GWMP interchange modification. The farmstead also serves as an example of the dairy farming industry that was widespread over Fairfax County at one time. (See attached Historic Sites Form for more information). There are two options proposed for the interchange modification. Although staff believes neither of the proposed options will negatively affect the historic property, staff prefers Option 2 as it is further away from the historic property and also impacts fewer trees to be removed. It is noted on page 68 of the EA that the trees in Option 1 that are proposed to be removed may be part of the original landscaping plan associated with GWMP. Heritage Resources staff had no further comments on the other proposed improvements contemplated in the EA.

Stormwater Impacts

The proposed project crosses four sub-watersheds in the Middle Potomac (Pimmit, Turkey, Dead and Scotts Runs). Three of these are on the state Impaired Waters List of waters that do not meet water quality standards for designated uses (e.g., aquatic life, fish consumption, recreation, etc.) and will require a TMDL (total maximum daily load) to be developed for any pollutants that are found to be the cause of the impairment(s). The EA mentions that Windy, Donaldson and other small streams will be protected by erosion and sedimentation control measures, but says almost nothing about these three watersheds. Pimmit is of particular concern, as a badly degraded reach of lower Pimmit lies immediately adjacent to the Parkway (see map in hardcopy to follow).

The Middle Potomac Watershed Management Plan recommends two projects on GWMP property: PM3979 (Buffer restoration of the unnamed Pimmit tributary on the border between Fairfax-Arlington Counties); and TR9913 (a Land Conservation Coordination Project along Turkey Run). Additionally, the county has stormwater infrastructure at numerous points within the proposed limits of disturbance. While the work could provide a net stormwater benefit overall (particularly the work on the Route 123/GWMP interchange), these issues should be addressed in the EA.

Transportation Impacts

	<p>The Fairfax County Department of Transportation (FCDOT) indicated that from their review of the EA they are supportive of the proposed project, including the pavement reconstruction, roadside barrier modifications, and other safety improvements. Once construction is nearing commencement, FCDOT, the Fairfax County Police Department, and the Dranesville District Supervisor should be involved in drafting the Transportation Management Plan. Construction activity should be timed to minimize traffic disruption. It was also noted that the proposed improvements to the GWMP/Route 123 interchange will be significant and therefore considerable public outreach should be conducted as early as possible in the design process. In addition, clarification should be provided on whether a new traffic signal is proposed at this interchange. Figure 9 on page 19 shows a proposed signal for Option 1 at this location, while the description on page 75 states that no additional traffic signal will be required.</p>	
73	<p>The Potomac Appalachian Trail Club (PATC) appreciates the opportunity to comment on this important project. We partner with the GWMP to maintain the Potomac Heritage Trail (PHT) whose route lies between the Parkway and the Potomac River. Work on the Parkway will impact the trail and the surrounding parkland. We hope that this project will minimize the impact on this important recreational resource.</p> <p>Based on information provided at the GWMP Open House on 27 June, the PHT tread should experience only minor disruption. Work at the crosswalk at the on/off ramps from the Parkway to Rt123 should accommodate the safe navigation of trail users. A major concern is the need to mitigate the storm water outfalls from the parkway. Some of the existing outfalls have caused major damage to the trail. Since the water flows from the road will likely need to stay in the same paths, past water damage to the land should be repaired as well as measures taken to ensure that new water outfalls do not cause erosion.</p> <p>PATC will work with GWMP to mitigate the impact of the outfall water on the PHT tread.</p> <p>PATC PHT District Manager</p>	<p>Thank you for your comments. It is the NPS intention to use a context sensitive approach that helps to preserve the historic character of the Parkway while making necessary roadway, drainage, and safety improvements.</p> <p>The NPS proposes to correct outfall infrastructure at 80 locations along the parkway. Correcting erosion from outfalls downstream of culverts on the PHT tread is not part of the scope of this project. The NPS will consider this request in the overall management and future projects on the Parkway.</p>
74	<p>The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.</p> <p>According to the information currently in our files, the Potomac Gorge Conservation Site is located within the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most</p>	<p>Thank you for your comments. A mitigation measure has been added to include re-submission of project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed. The NPS will coordinate with the VDGIF, with regard to the Wood turtle to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 - 570).</p>

<p>significant. The Potomac Gorge Conservation Site has been given a biodiversity significance ranking of B1, which represents a site of outstanding significance. The natural heritage resources of concern at this site are:</p> <p>Stygebromus pizzinii Pizzini's Amphipod G3G4/S1S2/NL/NL</p> <p>Eryngium yuccifolium var. yuccifolium Northern rattlesnake-master G5T5/S2/NL/NL</p> <p>Phacelia covillei Coville's phacelia G3/S1/NL/NL</p> <p>Symphotrichum shortii Short's Aster G5/S1/NL/NL</p> <p>Fontigens bottimeri Appalachian Springsnail G2G3/S2S3/SOC/LE</p> <p>Solidago racemosa Sticky Goldenrod G3/S1/NL/NL</p> <p>Stygebromus sextarius Capital area groundwater amphipod G1/S1/NL/NL</p> <p>Northern Coastal Plain / Piedmont Mesic Mixed Hardwood Forest G5/S5/NL/NL</p> <p>Coastal Plain / Outer Piedmont Basic Mesic Forest G4/S3/NL/NL</p> <p>DCR supports the Mitigation Measures and Best Management Practices of the Preferred Alternative outlined under the Natural Resources header in Chapter 2, page 26 of the Environmental Assessment including minimizing soil disturbance through erosion and sediment control best management practices, measures to reduce the introduction and spread of invasive herbaceous plant species associated with ground disturbing activities during the project, conducting rare plant surveys prior to construction within the limits of outfall repairs to identify and delineate confirmed occurrences of Phacelia covillei and ongoing consultation with DCR. DCR requests copies of rare, threatened and endangered species survey results upon completion.</p> <p>Due to the legal status of the Appalachian springsnail, DCR recommends coordination with the Virginia Department of Game and Inland Fisheries (VDGIF), Virginia's regulatory authority for the management and protection of this species to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 - 570).</p> <p>In addition, the Rusty patched bumble bee (<i>Bombus affinis</i>, G1/S1/LE/NL) has been historically documented within two miles of the project area. The Rusty patched bumble bee is listed as endangered under the Endangered Species Act by U.S. Fish and Wildlife Service (USFWS) effective March 21, 2017. Since the late 1990s, the Rusty patched bumble bee has declined throughout its historical range including Virginia and is anticipated to be extinct in all ecoregions by 2030. Threats to the Rusty patched bumble bee include disease, pesticides, climate change, habitat loss and small population dynamics.</p> <p>DCR recommends the implementation of the following USFWS voluntary measures for the conservation of the Rusty patched bumble bee: avoid pesticide use, avoid herbicide use, and plant native flowers that bloom throughout the spring and summer to support pollinator habitat.</p> <p>There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.</p>	
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	<p>Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.</p> <p>New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.</p> <p>The VDGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from http://vafwis.org/fwis/. According to the information currently in our files, Pimmit Run, which has been designated by the VDGIF as a "Threatened and Endangered Species Water" for the Wood turtle is within 2 miles of the project site. Therefore, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 - 570).</p>	
75	<p>Hooray! Pavement condition right now is awful, awful and I look forward to a smoother ride and a better RT 123 interchange. Two lanes through a must! Please improve the merge onto 495 N, too. Big backups in the morning while driving west/north from Rosslyn. Please fix the drop-down drain inlets as well. They are like massive potholes. Tire-poppers!</p>	<p>Thank you for your comments. It is the NPS intention to use a context sensitive approach that helps to preserve the historic character of the Parkway while making necessary roadway, drainage, and safety improvements.</p> <p>Modifications to the existing GWMP/I-495 off and on ramps are not part of the scope of this project. The NPS will consider this request in the overall management and future projects on the Parkway.</p>

APPENDIX E

SECTION 106 PROGRAMMATIC AGREEMENT