



## FINDING OF NO SIGNIFICANT IMPACT

### Theodore Roosevelt Island,

### Cultural Landscape Report and Environmental Assessment

#### George Washington Memorial Parkway, Virginia

The National Park Service (NPS), specifically the George Washington Memorial Parkway (GWMP), prepared a cultural landscape report and environmental assessment (CLR-EA) to evaluate alternatives for the rehabilitation of Theodore Roosevelt Island (TR Island).

The purpose of this project is to provide guidance for preserving the cultural landscape of TR Island and the adjacent portion of the GWMP. This project identifies and documents landscape characteristics, patterns, and features that convey the historical significance of the cultural landscape. This project will guide the long-term stewardship of TR Island and a portion of the GWMP by recommending a treatment approach that adheres to *the Secretary of the Interior's Standards for the Treatment of Historic Properties* and providing a framework for the NPS to appropriately apply preservation measures when planning improvements at the site.

The CLR-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 Code of Federal Regulations [CFR] 1500–1508), and NPS Director's Order #12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* and the accompanying NPS *NEPA Handbook*. Compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, and with Section 7 of the Endangered Species Act was conducted separately but concurrently with the NEPA process. 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.

#### NPS SELECTED ALTERNATIVE

Based on the analysis presented in the CLR-EA, the NPS selected Alternative 2 with the following Options for each specified Treatment Recommendation: Comfort Station Option 1; Land Circulation On-Island Trails Option 2; Land Circulation Off-Island Trails Option 4, and Water Circulation Option 2. This alternative is described on pages 6-4 thru 6-33 of the CLR-EA, with elements common to all action alternatives on pages 7-3 thru 7-6. The following summarizes the NPS selected alternative:

**Comfort Station Option 1:** The comfort station will be rehabilitated as a year-round, fully functional, universally accessible comfort station in its current location and footprint. The rehabilitation will maintain the integrity of the comfort station by implementing updates that adhere to the Secretary of the Interior's Standards. For additional detail, see pages 6-4 thru 6-8 of the CLR-EA.

**Land Circulation On-Island Trails Option 2:** - Continued maintenance of the portions of the trails with existing universal access (portions of the Swamp Trail, North Transverse Trail, and Woods Trail) will occur under this treatment alternative, as well as improvements to other trails and interpretive amenities. Improvements will include:

- creating universal access from the island terminus of the pedestrian bridge to the Memorial Plaza;
- creating universal access to the entire Swamp Trail, including access to the comfort station;
- correcting grades to allow tie-ins to existing trails;

- addition of wheel stops to the boardwalk on the Swamp Trail;
- decommissioning the social trail along the north shoreline by revegetating and constructing temporary fencing (2,287 feet (0.43 miles) of trail);
- decommissioning other social trails south of the TR Bridge (290 feet of trail);
- formalizing select social trails; and
- coordinating with DDOT to modify or relocate the chain link fence at the TR Bridge abutments.

In addition, this treatment alternative will create passive interpretive viewpoints/nodes at one or more locations on the island (see Maps 19-22 of the CLR-EA). These interpretive viewpoints/nodes will be created through selective pruning and cutting back limbs around the viewpoints. Neither heavy removal of vegetation nor clearing and grubbing are anticipated.

The final component of this option is the introduction of wayfinding amenities to help enhance the land circulation on TR Island (see Maps 17-20 in the CLR-EA). This focuses on signage to aid in the overall visitor experience. This wayfinding will be non-intrusive and compatible with the landscape and NPS sign standards. For additional detail, see pages 6-14 thru 6-25 of the CLR-EA.

**Land Circulation Off-Island Trails Option 4:** Both Northbound and Southbound Mount Vernon Trail users will have free flow conditions. A new left turn lane would be marked with dotted pavement markings and a stop line on the deck for users to make the left turn. In addition, the left turn bay is wider than in Alternative 1, and a large painted island separates the opposing directions of traffic, providing benefits similar to Alternative 3. The alignment of the curves is designed to meet the requirements in the AASHTO Bicycle Facilities guide (42 feet) but are not as gentle as the curves in Alternatives 1 and 2. The expansion of the deck is maximized to fill the entire gore area that is currently open in the deck at the intersection. Three new piles are required for the expansion. The remaining deck would be widened up to two feet on each side, across the length of the deck (14ft wide), utilizing existing piles. Trail widening where the bridge meets the land is not needed to tie in. For additional detail see page 6-28 thru 6-29 of the CLR-EA.

**Water Circulation Option 2:** Water circulation and access would be re-established on the island. This would be achieved by creating formal soft landings or launches for small non-motorized watercraft in locations that were historically utilized for this purpose. See Map 23 of the CLR-EA for a graphic of the proposed boat landing/launch locations. Work associated with the reestablishment of these landings would include minor clearing of large rocks and debris and pruning and cutting back of overgrown vegetation. No heavy excavation or clearing and grubbing would occur. In addition to the soft water landings, one floating dock for non-motorized watercraft would be installed. The floating dock would be placed at the northeast corner of the island, which is the site of a historic ferry landing and a later floating dock. The dock would be approximately 100 feet in length. Minor clearing of large rocks and debris and pruning and cutting back of overgrown vegetation would be required. No heavy excavation or clearing and grubbing would occur. The installation of a floating dock could require piles, which would necessitate drilling.

## **RATIONALE FOR DECISION**

The NPS selected alternative, Alternative 2 with Comfort Station Option 1; Land Circulation On-Island Trails Option 2; Land Circulation Off-Island Trails Option 4, and Water Circulation Option 2, for implementation because it will best address the recreation, education, visitor experience, and preservation goals of this project while striving to preserve the known landscape characteristics that have existed through the various periods of significance outlined in the CLR-EA.

Alternative 1, the No Build Alternative would not meet the project's purpose and need for several reasons. Regarding the Comfort Station, the existing building would be maintained however it would remain deficient in meeting ABA requirements, and it would not be open year-round. For the Land Circulation On-Island Trails, the No Build Alternative fails to address the issues surrounding social trails and also does not allow for the clearing of trails for additional accessibility. It also fails to establish new

trails, access points, or viewpoints. The Land Circulation Off-Island Trails would maintain the existing Bridge 31 in its current condition and alignment and would not address the pedestrian and bicycling safety issues. Under the No Build Alternative, Water-Circulation, no formalized water access points or landings would be established on the island. Boaters and kayakers would continue to beach their non-motorized watercraft on unmarked areas, impacting the natural and archeological resources, and exposing boaters and kayakers to underwater hazards in shoreline areas.

The NPS selected alternative has been refined through coordination with the District of Columbia Historic Preservation Office, the Virginia State Historic Preservation Office, and the Theodore Roosevelt Association.

## MITIGATION

The selected alternative incorporates the mitigation measures listed in “Appendix A: Mitigation Measures” in this FONSI.

## ALTERNATIVES CONSIDERED

The EA provides an overview of the proposed project and analyzes 2 alternatives and their impacts on the environment: Alternative 1, No-Action Alternative (pages 6-2 to 6-4 of the CLR-EA), and Alternative 2, the selected alternative, Alternative 2 with Comfort Station Option 1; Land Circulation On-Island Trails Option 2; Land Circulation Off-Island Trails Option 4, and Water Circulation Option 2. Within these two alternatives are three Treatment Recommendations as actions that are critical to the mission and purpose of the park. These Treatment Recommendations are Comfort Station, Land Circulation, and Water Circulation. Information can be found on page 6-35 of the CLR-EA.

## FINDING OF NO SIGNIFICANT IMPACT

As described in Chapter 7 of the CLR-EA, the NPS Selected alternative will result in both beneficial impacts or negative impacts to park resources including Historic Structures, Archeological Resources, Cultural Landscapes, Wetlands, Views and Vistas, and Visitor Experience. Anticipated impacts to these resources are summarized below.

**Historic Structures:** The selected alternative will result in a beneficial impact on Historic Structures. Under the Comfort Station Option 1, the rehabilitation efforts for the Comfort Station will adhere to the Secretary of the Interior’s Standards for Rehabilitation and would retain the characteristics and integrity of the comfort station that makes it a contributing resource to the NRHP-listed property.

**Archeological Resources:** Archeological resources have not been fully identified at TR Island, however, due to the historic context of the island, the probability for archeological resources is high throughout the island. The Selected Alternative will result in both long-term beneficial impacts to archeological resources as well as negative impacts to archeological resources. Under the selected alternative, on-Island Trails, there will be long-term beneficial impacts to archeological resources through the decommissioning of social trails. Social trails are unplanned trails created by users of the island. The social trail can negatively impact archeological resources on TR Island by trampling and eroding undisturbed soils that may contain physical evidence of past cultural activity. Decommissioning the social trails will positively impact archeology resources by removing unplanned trails and filling the trail beds.

Under the selected alternative, Water-Circulation, the selected Option may negatively impact archeological resources at the site of the proposed floating dock and at the proposed soft-landing locations. Archeological resources are known to be extant throughout TR Island, including at these locations (one of which is the site of the former ferry landing). Archeological investigations would be required prior to the installation of any soft landing to ensure that archeological resources are avoided.

**Cultural Landscapes:** The selected alternative will result in both a negative and a beneficial impact on Cultural Landscapes. Under the Comfort Station Option 1, exterior repairs will be made to the comfort station, and a ramp will be added to the front of the building to provide ABA access. The introduction of a

new visual element (the ramp) would result in a change to the surrounding landscape and would negatively impact the cultural landscape.

Under On-Island Trails, Option 2, selected social trails will be removed. Social trails are unplanned trails created by users of the island. The social trails negatively impact the Cultural Landscape by introducing new elements that alter the Landscape Characteristics that are key components of the cultural landscape. Social trails disrupt the historic, or planned, circulation routes and can disrupt or damage other key landscape characteristics. Decommissioning the social trails will be a beneficial impact to the Cultural Landscape by removing unplanned trails and rehabilitating the landscape to its historically appropriate configuration.

The selected alternative, Water-Circulation, Option 2 will have a beneficial impact on the Cultural Landscape. The addition of soft landings will create new access points to the island and will ensure that user access is controlled, reducing the use of unofficial boat landings and the creation of social trails to serve those landings. The long-term impact to the TR Island Cultural Landscape is beneficial as this Option will reduce physical impacts to resources and key landscape characteristics caused by unplanned, water-based visitor access and usage.

**Wetlands:** The selected alternative will have a beneficial impact on wetlands. Under the Land Circulation On-Island Option 2 long-term, beneficial impacts to project area wetlands would occur. Decommissioning and revegetating the social trails at the southern tip and the northeast corner of the island would allow the reestablishment of wetlands and improved wetland quality and wetland function(s) where social trails currently exist. In addition, this Option would direct visitors to utilize the NPS trails, thereby reducing additional social trails being formed through wetland areas. While the establishment of the viewpoints/nodes, and some trail maintenance and grade corrections would take place within the NWI identified PFO1S wetland complex in the northeastern portion of the island, and within the NWI identified PFO1R wetland at the southern tip of the island, no permanent, negative impacts to wetlands will occur. Wetland protection measures such as the placement of protective fencing and the use of bio mats where applicable during the implementation of the planned improvements would avoid impacts to wetlands. In addition, no new trails are proposed within wetland areas, and no clearing or grubbing is proposed for the viewpoints/nodes.

The selected alternative, Water-Circulation Option 2, will have beneficial impacts on wetlands. The implementation of official designated boat launch/landing areas will deter visitors from accessing the island through unofficial landings damaging shoreline wetlands. In addition, wetlands previously damaged by unofficial landings and launches would be restored naturally overtime. In addition, the implementation of official, designated boat launch/landing areas, and the addition of a floating dock will deter visitors from accessing the island through unofficial landings damaging shoreline wetlands. In addition, wetlands previously damaged by unofficial landings and launches would be restored naturally overtime.

**Views and Vistas:** The NPS selected alternative will have a beneficial impact on Views and Vistas. Both the On-Island Trails Option 2 and the Water Circulation Option 2 will have a beneficial impact. The addition of established viewpoints/nodes will provide expanded views from TR Island to the surrounding communities, as well as improved interpretation of the historic setting of the island; furthermore, trail maintenance and upgrades will improve historic sightlines in areas such as the marsh and swamp. The establishment of official boat launch/landing areas are proposed within the same vicinity as three of the viewpoints recommended locations including the northeast corner, the northwest corner, and the southwest corner of the island. In addition, a large landing at the southwest point under the TR Bridge is proposed. The establishment of the boat launches would allow improved interpretation of the historic setting of the island as well as improved views and vistas to and from TR Island. This would include views to TR Island from both the Rock Creek and Potomac Parkway (RCPP) and the Kennedy Center.

**Visitor Experience:** The selected alternative will have a beneficial impact on Visitor Experience. The Comfort Station Option 2 will rehabilitate the existing Comfort Station, providing a long-term beneficial impact. Visitors would continue to utilize the island comfort station as they currently do, but with an upgraded, universally accessible facility. Visitors would also continue to make use of the comfort station as historically planned and designed by the Olmsted Brothers.

For Land Circulation, On-Island Trails, Option 2 would have a beneficial impact on the Visitor Experience. Decommissioning social trails would allow visitors to experience an improved (more formalized), maintained, and safer trail network. The implementation of this Option will have an overall long-term, beneficial impact on visitor experience by allowing for better circulation throughout the island, and an increase in visitor safety. This treatment alternative proposes the creation of passive interpretive viewpoints/nodes at one or more locations on the island, and the introduction of wayfinding amenities. Wayfinding amenities would help enhance the land circulation on TR Island and focuses on signage to aid in the overall visitor experience.

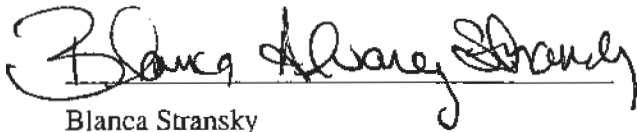
The selected alternative Off-Island Trails Option 4 provides a beneficial impact on the visitor experience as it provides increased safety features for both pedestrian and cyclist use.

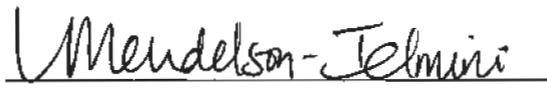
Impacts to the Visitor Experience under Water Circulation Option 2 are beneficial. Through the reestablishment of boat launches/landing areas in locations where they historically existed, visitors can experience improved interpretation of the cultural setting and historic viewsheds of the island, as well as utilize designated shoreline access to the island, improving visitor safety. Option 2 provides additional visitor experience benefits due to the installation of a floating dock. The dock would provide visitors additional options for launching/landing non-motorized watercraft and access to and from the island, as well as enhanced interpretation of the cultural setting due to the placement of the dock at the historic former ferry landing.

**CONCLUSION:**

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

Based on the foregoing, it has been determined that an environmental impact statement is not required for this action and will not be prepared. This is a finding of no significant impact.

**Recommended:**  10/31/18  
Blanca Stransky Date  
Acting Superintendent, George Washington Memorial Parkway  
National Capital Region

**Approved:**  11/14/2018  
Lisa A. Mendelson-Ielmini Date  
Acting Regional Director  
National Capital Region

## **LIST OF APPENDICES**

Appendix A: Mitigation Measures

Appendix B: Non-impairment Determination

## APPENDIX A: MITIGATION MEASURES

The National Park Service (NPS) places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented as part of the selected alternative. NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

### VEGETATION

- Following construction, revegetation of temporarily disturbed areas will follow applicable best management practices to minimize and prevent the establishment of invasive species. Fill material will be obtained in accordance with agency approvals and permitting requirements and will be certified free of exotic invasive vegetation species and weeds. The equipment used at the site will be free of mud, dirt, and plant material before use. Plants used in revegetation activities will include only native species. Prior to revegetation, disturbed areas will be monitored for any invasive plant species.
- Ground disturbance will be avoided and minimized, where possible.
- Trees removed during construction will be replaced within the project area or elsewhere in the George Washington Memorial Parkway at a 1:1 diameter at breast height ratio.

### AQUATIC WILDLIFE

- The installation of a floating dock would be subject to permitting requirements and use of appropriate sediment and erosion control management practices as required in DC Stormwater Manual to minimize the potential for sediment-laden runoff from the construction site, which could affect aquatic wildlife.
- Consultation with the US Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) would determine any additional mitigation measures, which may include seasonal restrictions for in-water work. All mitigation measures required by USFWS and NMFS will be included in the decision document for this proposed action.

### HISTORIC DISTRICTS AND CULTURAL RESOURCES

All mitigation for historic districts and cultural landscapes will be completed in consultation with the Virginia and District of Columbia (DC) state historic preservation officers (SHPO); this consultation will continue into the design phase of the project. The Virginia SHPO concurred with the NPS' determination of a *Conditional No Adverse Effect* for the project on September 14, 2018. This concurrence is based on the condition that NPS provides the Virginia SHPO with the opportunity to review drawings or final specifications for the non-motorized watercraft landings and floating dock. The DC SHPO concurred with the NPS' determination of a *Conditional No Adverse Effect* with the recommendation that alterations to the comfort station be kept to a minimum. Impacts on historic structures or districts will be minimized by ensuring that improvements are conducted in a manner consistent with the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. If archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy can be developed. Consultation with NPS, and/or the NPS regional archeologist and the SHPOs will be coordinated to ensure that the protection of the resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 United States Code 3001) of 1990 will be followed.



## ARCHEOLOGICAL RESOURCES

The DC SHPO's *Conditional No Adverse Effect* concurrence for archeology is based on the condition that NPS continues to consult with DC SHPO at the conclusion of the park's archeological identification survey of the island. This identification effort will inform the design phase of the project. All mitigation for archeological resources will be completed through section 106 consultation with the Virginia and DC SHPOs.

1. Archeological investigations will be undertaken, as necessary, in any areas that will be disturbed to identify potential archeological resources. Consultation with the District of Columbia Historic Preservation Office and Virginia Department of Historic Resources will continue during the identification and evaluation of potential archeological resources, as well as for any proposed mitigation measures to resolve potentially adverse effects. Wherever possible, potential archeological sites will be preserved and protected through the introduction of fill (as opposed to excavation) and/or the use of geotextiles. Specifically:
  - a. In areas where the social trails will be decommissioned, fill will be placed on top of the existing social trails to infill them (to align with the adjacent ground). No excavation will be done on the social trails, therefore, protecting any extant archeological sites.
  - b. The proposed soft kayak landings are predominantly in areas that have archeological potential (both terrestrial and maritime). The areas selected will need only minor work including clearing large rocks and debris and pruning vegetation. No heavy excavation or clearing and grubbing will be necessary.
  - c. One floating dock is proposed. The installation of this floating dock will require archeological investigations to ensure that the proposed location will not disturb any existing maritime archeological sites.
2. The rehabilitation of the existing comfort station will be in keeping with the Secretary of the Interior's Standards for Rehabilitation and will require only minor alterations to the exterior of the existing building. An ABA accessible ramp will be installed leading to the two entrances of the comfort station; however extensive excavation is not needed for the construction of the ramp. In addition, the existing comfort station doors will be replaced to comply with ABA standards. The existing doors are not original to the building, and their replacement will be sympathetic to the existing fabric of the building.

## VISITOR USE AND EXPERIENCE

Construction activities for the project will be limited to daytime hours and subject to all applicable local, state, and federal noise ordinances and compliance measures.

## APPENDIX B: NON-IMPAIRMENT DETERMINATION

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

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

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

### WHAT IS IMPAIRMENT?

*NPS Management Policies 2006*, Section 1.4.5, What Constitutes Impairment of Park Resources and Values, and Section 1.4.6, What Constitutes Park Resources and Values, provide an explanation of impairment. Impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

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

Section 1.4.5 of *Management Policies 2006* states:

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

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

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

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

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

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

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

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

### **HOW IS AN IMPAIRMENT DETERMINATION MADE?**

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

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

The *Theodore Roosevelt Island Cultural Landscape / Environmental Assessment* analyzes impacts to the following resources: historic structures, archaeological resources, cultural landscapes, wetlands, views and vistas, and visitor experience. *NPS Guidance for Non-Impairment Determinations and the NPS NEPA Process* states that:

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

As a result, for purposes of this document, impairment findings are required for historic structures, archeological resources, cultural landscapes, wetlands, and views and vistas.

### **NON-IMPAIRMENT DETERMINATION FOR THE SELECTED ALTERNATIVE**

This non-impairment determination has been prepared for the NPS selected alternative described on pages 6-4 through 6-34 of the CLR-EA, plus the elements common to all action alternatives described on pages 7-3 through 7-7 of the CLR-EA. A non-impairment determination is made for all relevant resource impact topics analyzed for the selected alternative.

## Historic Structures

The comfort station is considered a contributing resource to TR Island's significance for which it is listed in the National Register of Historic Places. The selected alternative will not alter any character-defining features of the comfort station however it will introduce modern materials into the building and its setting. The purpose of TR Island as a whole will not be altered. It will remain a memorial to Theodore Roosevelt, perpetuating the memory of Theodore Roosevelt for the benefit of the people of the United States and the world, including his devotion to the conservation of America's natural resources. The rehabilitation efforts for the comfort station will be compliant with the Secretary of the Interior's Standards for Rehabilitation and will retain the characteristics and integrity of the comfort station that make it a contributing resource to TR Island. Changes under the selected alternative will not alter the historic integrity such that the structures could no longer convey its significance. The National Park Service consulted with the Virginia Department of Historic Resources and District of Columbia Historic Preservation Office throughout the alternatives refinement process. Therefore, the selected alternative will not result in an impairment of the comfort station.

## Cultural Landscape

The cultural landscape is considered one of the fundamental resources and values of the park. The selected alternative will alter some of the character-defining features of the landscape through the addition of modern materials through the construction of a modern, ABA compliant ramp, leading to the comfort station entrances. However, the cultural landscape will continue to reflect the period of significance, and the purpose of TR Island as a whole will not be altered. Other, beneficial impacts will occur through the decommissioning of social trails throughout the island and the creation of soft water landings. The social trails negatively impact the cultural landscape by introducing new elements that alter the Landscape Characteristics that are key components of the cultural landscape. Social trails disrupt the historic, or planned, circulation routes and can disrupt or damage other key landscape characteristics. Decommissioning the social trails will remove unplanned trails and rehabilitating the landscape to its historically appropriate configuration. The addition of soft landings will create new access points to the island and will ensure that user access is controlled, reducing the use of unofficial boat landings and the creation of social trails to serve those landings. The long-term impact to the TR Island Cultural Landscape is beneficial as this Option will reduce physical impacts to resources and key landscape characteristics caused by unplanned, water-based visitor access and usage. The site will remain a memorial to Theodore Roosevelt that perpetuates the memory of Theodore Roosevelt for the benefit of the people of the United States and the world, including his devotion to the conservation of America's natural resources. The National Park Service consulted with the Virginia Department of Historic Resources and District of Columbia Historic Preservation Office throughout the alternatives refinement process. Therefore, the selected alternative will not result in an impairment of the cultural landscape.

## Archeological Resources

Archeological resources are identified as one of the important resources and values. The selected alternative will have both beneficial and negative impacts to archeological resources. The negative impacts will be mitigated through archeological investigations at specific locations (the soft water landings and the floating dock). Archeological resources have not been fully identified at TR Island, however, due to the historic context of the island, the probability for archeological resources is high throughout the island. There will be long-term beneficial impacts to archeological resources through the decommissioning of social trails. Social trails are unplanned trails created by users of the island. The social trail can negatively impact archeological resources on TR Island by trampling and eroding undisturbed soils that may contain physical evidence of past cultural activity. Decommissioning the social trails will positively impact archeology resources by removing unplanned trails and filling the trail beds. Under the selected alternative, Water-Circulation, the selected Option will negatively impact archeological resources at the site of the proposed floating dock and at the proposed soft-landing

locations. Archeological resources are known to be extant throughout TR Island, including at these locations (one of which is the site of the former ferry landing). Archeological investigations will be completed prior to the installation of any soft landing to ensure that archeological resources are appropriately documented and protected. The National Park Service consulted with the Virginia Department of Historic Resources and District of Columbia Historic Preservation Office throughout the alternatives refinement process. Therefore, the selected alternative will not result in an impairment of archeological resources.

### **Wetlands**

The preferred alternative will have a beneficial impact on wetlands. Decommissioning and revegetating the social trails at the southern tip and the northeast corner of the island would allow the reestablishment of wetlands and improved wetland quality and wetland function(s) where social trails currently exist. In addition, visitors will be directed to utilize the NPS trails, thereby reducing additional social trails being formed through wetland areas. While the establishment of the viewpoints/nodes, and some trail maintenance and grade corrections would take place within NWI wetlands, no permanent, negative impacts to wetlands will occur. Wetland protection measures such as the placement of protective fencing and the use of bio mats where applicable during the implementation of the planned improvements would avoid impacts to wetlands. The implementation of official designated boat launch/landing areas will deter visitors from accessing the island through unofficial landings damaging shoreline wetlands. Wetlands previously damaged by unofficial landings and launches would be restored naturally overtime. The beneficial impacts provided by the preferred alternative will help to rehabilitate the overall setting of TR Island. Therefore, the selected alternative will not result in an impairment to wetlands.

### **Views and Vistas**

The addition of established viewpoints/nodes will provide expanded views from TR Island to the surrounding communities, as well as improved interpretation of the historic setting of the island; furthermore, trail maintenance and upgrades will improve historic sightlines in areas such as the marsh and swamp. The preferred alternative will have a beneficial impact on the views and vistas both to and from TR Island. The overall purpose of TR Island will be enhanced through the improvements to the views and vistas of TR Island. Therefore, the selected alternative will not result in an impairment to views and vistas.

