
I. Summary of Substantive Public Comments and Responses to the Draft Jones Point Park Environmental Assessment, August 2006

I. Summary of Substantive Public Comments and Responses to the Draft Jones Point Park Environmental Assessment, August 2006

Introduction

Jones Point Park in Virginia is a special place to contemplate and enjoy the wonders and resources of the Potomac River, participate in recreational activities, and study the rich history of Alexandria, Virginia and the District of Columbia. It also plays an active role in the transportation system of Washington, D.C.

Several planning projects have been initiated in the park over the past years. These include a 1984 concept plan for the improvements to the park, the construction of two new bridges across the Potomac River, the demolition of the existing bridge; a 2001 draft plan and Environmental Assessment (EA) for improvements to the park; and now, a continuation of the 2001 planning process to redefine the access to the park and determine impacts to the human environment. The current EA studied the access and impacts that are the result of security measures scheduled for the Woodrow Wilson Bridge that would be implemented in Jones Point Park.

After reviewing public comment and careful consideration of impacts to park resources, and the mitigation commitments outlined in the Woodrow Wilson Bridge Project, the park has modified the preferred alternative, and selected Alternative 4A as the preferred alternative. This alternative was created by drawing elements from the other alternatives in the EA, maximized resource management options, assessed varied park interests and uses, and considered all of the public comments received. NPS Preferred Alternative 4A meets the purpose and need of the EA, and the level of effect does not reach above minor or moderate impacts.

The Environmental Assessment presented the alternatives studied for improvements to JPP that are a part of the mitigation commitments outlined in the 2000 Record of Decision (ROD) and 1997 Memorandum of Agreement (MOA) with the Virginia State Historic Preservation Office (SHPO) et al, required for the Woodrow Wilson Bridge (WWB) Replacement Project. The proposed alternatives include the No-Action Alternative and four action alternatives. The No-Action Alternative maintains the existing soccer fields located south of the WWB; however, the No-Action Alternative does not address the federal Transportation Security Administration's (TSA) security recommendation to remove all public vehicle access and parking from beneath the new WWB. Further, the No-Action Alternative does not fulfill the Purpose and Need for the project (refer to Chapter 1.0 of this EA), the NPS resource management goals for JPP (refer to Chapter 2.0 of this EA), or the conditions relevant to JPP as stated in the Record of Decision and the Memorandum of Agreement for the WWB Replacement Project (refer to Appendices E and F of this EA).

The four action alternatives presented in the EA, and the selected Preferred Alternative 4A contain the following similar components: park manager's office/comfort station; tot lot; promenade/boardwalk; access to the Mt. Vernon Trail; shoreline stabilization; proposed bulkhead, canoe/kayak launch, and a fishing pier; the rehabilitation of the Jones Point Lighthouse and the preservation of the D.C. South Cornerstone; and drainage improvements along a new access road.

The differences between the action alternatives relate to the location and orientation of the multi-use fields, the length of the access road, and the location and size of parking areas. Each action alternative could use a combination of perimeter barriers to limit vehicular access and public parking under the WWB and within an 80-foot distance surrounding the bridge.

The NPS selected Preferred Alternative 4A to improve and enhance Jones Point Park (JPP). The project includes recreational features, an interpretive plan related to cultural resources, and proposed modifications to parking and access within the park. The NPS and the City of Alexandria's goal for the redevelopment of JPP is a carefully balanced program of active recreation, passive recreation, and interpretation of archeological, historic, cultural, and natural park features.

The *Jones Point Park Environmental Assessment* was released for a 60-day public comment period on August 18, 2006. A public meeting recorded public comments on September 13, 2006. During the public review period, the park received a total of 393 comment letters and a petition with 81 signatures. On Wednesday, September 13, 2006 the park held a public hearing at the Radisson Inn Old Town, Alexandria. A court reporter was present at the meeting and recorded 36 public comments. Of the comment letters received, 23 were duplicates (i.e. received both in PEPC and by letter or during the public hearing). Of the petition, 29 were duplicates and 10 were not readable. Most of the comments received either supported Alternative 1 or Alternative 4. In support of Alternative 1, there were 184 individual comments. In support of Alternative 4, the park received 219 comments including signatures from the petition. There were no comments on Alternatives 2 and 3. The park also received 9 general comments that did not support any alternative. Comments contained in the public comment record include the following subject areas.

- For and against fields in the park
- Location of fields elsewhere in the City of Alexandria
- Concerns about potential flooding that could result from developments north of the bridge
- Preservation of the historic portion of Jones Point Park south of the bridge
- Potential impacts to wetlands (in particular as it relates to preserving natural environments that help control flooding)
- Potential impacts to woodlands, trees, and wildlife
- Potential impacts that access and parking could have on adjacent neighborhoods
- Need to preserve garden space north of the bridge
- Secured event parking under the bridge
- Noise impacts associated with fields north of the bridge
- Noise mitigation linked to the WWB EIS
- Potential impacts to neighborhood streets

This document contains a summary of the substantive public concerns for the *Jones Point Park Environmental Assessment*, and the National Park Service response to those concerns. All comments were considered during the development of the selected Preferred Alternative 4A.

Comment Analysis Process

The letters, emails, Internet entries, and faxes represented in this report were analyzed using the National Park Service's Internet based Planning, Environment and Public Comment database. The comment analysis process includes three main components: a coding structure, a comment database, and a narrative summary. Initially, a coding structure is developed to help sort comments into logical groups by topics. Code categories are derived from an analysis of the range of topics covered in relevant present and past planning documents, National Park Service legal guidance, and letters themselves. The object of these codes is to allow for quick access to comments on specific topics. The coding structure used was inclusive rather than restrictive—an attempt was made to capture all comments.

The second phase of the analysis involves the assignment of codes to statements made in the public correspondence. For each comment in a piece of correspondence, codes are assigned by one staff person, validated by another, and then entered into a database as verbatim quotes from actual public statements. The database, in turn, is used to help construct this narrative summary.

The third phase includes the identification of statements of public concern and the preparation of a summary report. Statements of public concern are identified throughout the coding and writing process and are derived from and supported by quotes from original letters. These public concerns attempt to present common themes identified from comments in a statement that captures the action the public feels the National Park Service should undertake. Public concerns are derived directly from letters and through a review of the database. Each is worded to give decision makers a clear sense of the public's concerns. Statements of concern are not intended to replace actual comments or sample statements. Rather, they can help guide the reader to comments relating to the specific topic in which they are interested. All identified public concerns, whether in or out of scope, or supported by the comments of one person or many, are included.

The public concern statements and its supporting quotes are carefully read to determine if the concern is within or out of the scope of the project and whether substantive or nonsubstantive. In accordance with the National Park Service's NEPA guidance (Director's Order #12), and based on the Council of Environmental Quality regulations, a substantive comment is one that:

- Questions, with reasonable basis, the accuracy of the information in the environmental analysis;
- Questions, with reasonable basis, the adequacy of environmental analysis;
- Presents reasonable alternatives other than those presented in the environmental analysis;
- Causes changes or revisions in the proposal.

Nonsubstantive comments include those that simply state a position in favor or against the proposed alternative, merely agree or disagree with National Park Service policy, or otherwise express an unsupported personal preference or opinion. Although a commentor's personal opinions on a subject may influence the development of the final plan, they generally would not affect the impact analysis. Based on this analysis, National Park Service responses are developed for each public concern.

The *Jones Point Park Environmental Assessment* contains those concerns that were screened as being substantive, along with supporting quotes and the National Park Service responses. Emphasis in this process is on the content of the comment rather than the number of people who agree with it. This is not a vote-counting process, and no effort has been made to tabulate the number of people for or against a certain aspect of a specific planning topic. This information can be derived manually from the database, if desired.

Although the comment analysis process attempted to capture the full range of substantive public concerns, this summary should be used with caution. Comments from people who chose to respond do not necessarily represent the sentiments of the entire public. All substantive comments are treated equally and are not weighted by number, organizational affiliation, or other status of respondents.

For more information, the reader should refer to the database reports prepared as part of this process and the original letters available in the Planning and Compliance Office, George Washington Memorial Parkway, McLean, Virginia, 22101.

How To Use This Document

This comment analysis summary is divided into sections. The first section includes general comments on the planning process and National Park Service policies. The next section covers comments on the Jones Point Park Improvement Plan alternatives. The next section addresses comments regarding natural resources, including water, vegetation, wetlands, and cultural resources. The next section addresses park social resources including visitor experience, access, transportation, and park operations.

Each section includes one or more statements of public concern. These statements attempt to present common themes identified from comments that capture what action the public feels the National Park Service should undertake. Each statement is, in turn, followed by supporting quotes from public comments derived from original correspondence. Where appropriate, text in brackets attempt to clarify the meaning in a quote. Each public concern statement, and its supporting quote, is followed by the National Park Service response.

Planning Process and Policy

Concern Statement: Commenters claim the NPS has ignored input from the community and elected representatives.

Representative Quote: “The NPS plan ignores the proven needs of the greater community and the input of our elected representatives.”

Representative Quote: “The Alternative 4 plan designed by the NPS was not part of any earlier discussions with the city. The plans submitted by the city for consideration by NPS went through extensive public review and studies. The first time the NPS Alternative 4 plan appears is in this Environmental Assessment.”

Representative Quote: “The City's plan, called Alternative 1 with two full size fields north of the bridge, was debated and approved by City Council prior to September 11, 2001 and again after. Alternative 1 is also endorsed by the Park and Recreation Commission, Youth Sports Advisory Board, the Environmental Policy Commission and the Archeological Commission.”

NPS Response: As part of the NEPA process, the park worked in consultation and coordination with various agencies and organizations, including the City of Alexandria (Department of Recreation, Parks and Cultural Activities, Department of Transportation and Environmental Services, Historic Alexandria Resources Commission, and Alexandria Archaeological Commission); the Federal Highways Administration; the Virginia Department of Transportation; the Virginia State Historic Preservation Office; and various local and civic community groups, including Yates Gardens Civic Association, Old Town Civic Association, Citizens for a Natural and Historic Jones Point Park, which included a public involvement program as identified in the EA. This process began in 1998 and continued through the draft EA submitted for public review in the fall of 2006. The NPS considered all public and agency comments in the development of alternatives presented in the EA. The preferred alternative (Alternative 4), as shown in the EA, was first presented to the public during a public scoping session (also presented in a Newsletter made available to the public) where comments were accepted for a 30-day period in October 2005.

Considering comments obtained through the public review process of the 2006 Jones Point Park EA, the park modified the preferred alternative to include an additional multi-use field. Preferred Alternative 4A provides a balance of active and passive uses in the park while ensuring the protection of natural and cultural resources.

Concern Statement: Commenters claim the NPS is bound by law to provide fields as mitigation for the WWB Project.

Representative Quote: “The federal government promised the City of Alexandria two full-size fields at Jones Point Park in the court settlement to mitigate the impact of the Wilson Bridge Project; the United States Congress approved the mitigation, the National Park Service is bound by law to abide, and the funds designated for these two fields can be used only at Jones Point Park.”

NPS Response: In January of 1998, the City of Alexandria filed an action (Civil Action No. 98-0251-SS (D.D.C.) against the U.S. Department of Transportation challenging the Record of Decision approving the Woodrow Wilson Memorial Bridge on various grounds regarding concerns the City had for historic preservation and environmental protection. Both parties entered into a Settlement Agreement in order to address mutual needs and interests. Among these was the design programs outlined for Jones Point Park, including a conceptual drawing of two small fields which had been in existence for many years at Jones Point Park and used by the City to support athletic programs. The National Park Service owns and administers Jones Point Park, and has operated under a different agreement to allow the City use of the park for recreational fields. Furthermore, the National Park Service was not a signatory in the agreement between the City of Alexandria and the Department of Transportation, and is therefore, not bound by the terms of the agreement.

Alternatives

Concern Statement: Commenters stress that Alternative 1 best separates active and passive uses of the park, which was a consideration for creating the best balance of competing park uses.

Representative Quote: “Not only are both passive/open space and active/recreation space provided by the plans [in alternative 1], but they are separated by the new bridge so that each can function without interfering with the users of the other. The Park Service’s new “preferred alternative” completely ignores, and totally destroys, this balance.”

NPS Response: As a result of the public review period for the 2006 Jones Point Park EA, the park modified the preferred alternative to include an additional multi-use field. Preferred Alternative 4A provides one small field (80 x 40 YD) north of the bridge and a larger field (110 x 60 YD) south of the bridge. When balancing the uses of the park and resource protection, the NPS weighed the impacts of the loss of natural resources in the alternatives that placed fields only north of the bridge with that of other options. By placing one field north and one field south of the bridge, the park must compromise the creation of a fully passive area for Jones Point Park south of the bridge for the preservation of forested areas north of the bridge.

The difference between Alternative 1 (removes 4.1 acres of forest) and the Preferred Alternative 4A (removes 1.9 acres of forest) is 2.2 acres of forest. The south field will be designed to be as compatible as possible with passive uses. The south field would be moved closer toward the bridge to minimize impacts to the cultural resources of the shipway and D.C boundary line that will be adjacent to the field. The NPS feels that although a field will be present and in close proximity to the cultural resources, it will still be possible to provide enhancements to the cultural resources and interpretive opportunities without causing major impacts. In addition, when the field is not in use, the space will provide for passive recreational opportunities. For the protection of archeological resources, clean fill material will be placed over the area where the south field will be constructed, encapsulating the archeological resources to preserve them underground. Special measures during construction will provide necessary protection of archeologically sensitive areas.

Concern Statement: Commenters point out that Alexandria has other options for recreational fields, and that the City has identified land for possible use to build fields outside of Jones Point Park.

Representative Quote: “Alexandria has other options for recreational fields...Ben Bremen Park...Potomac Yard”

Representative Quote: “On the subject of soccer fields, I also feel that less is better. As the parent of two boys who play under the Alexandria Soccer Association, I can tell you that in the 6 years we have been playing and with all of the construction involving the bridge and T.C. Williams School, we have never not had a place to play soccer. Parks are for greenspace with trees, not clear cut filled in wastelands.”

Representative Quote: “I do not think there is any room at Jones Point Park for soccer fields. The Woodrow Wilson Bridge Project has already downsized the park enough, and what little room is left, should be used for historical markers and water-related activities.”

NPS Response: This Environmental Assessment examines the impacts of multi-use fields at Jones Point Park. Since the beginning of the planning process, the purpose and need for the action has included multi-use fields; therefore, every alternative has included this element. The City of Alexandria, operating under a permit with the NPS, utilizes and maintains the fields and other aspects of Jones Point Park. In determining the appropriate uses for Jones Point Park, the NPS has determined that two fields are compatible with the management of the park and resource protection. The NPS feels that the Preferred Alternative 4A strikes a balance between active recreational use and resource protection.

Vegetation, Wetland and Wildlife Resources

Concern Statement: Commenters stress that placing two regulation size fields in Jones Point Park will cause too much damage to existing wetlands, woodlands, and animal and plant species and habitat.

Representative Quote: “Location of two large playing fields and their accompanying parking north of the bridge maximizes the damage to the wetlands, woodlands, and animal and plant species that constitute so much of the park's natural value.”

Representative Quote: “Any significant change to these lands, such as clear cutting the forests and filling the wetlands, will clearly result in degradation of not only that land, but the surrounding lands and the native wildlife and plants which live there.”

NPS Response: The proposed Preferred Alternative 4A places one small field to the north of the bridge and one larger field south of the bridge. An access road and parking will be located north of the bridge. Approximately 0.4 acres of wetlands and 2.9 acres of woodlands will be impacted. Impacts to wetlands will include 0.2 acres of non-tidal forested wetlands associated with the construction of the access road, and 0.2 acres of tidal emergent wetlands associated with the Potomac River shoreline. One acre of woodland will be removed to expose the remains of the shipway south of the bridge for interpretation. The access road and perimeter barriers will impact approximately 1.4 acres of woodland. The tot lot and small recreational field north of the bridge will impact 0.4 acres of woodlands. Additional impacts from a pedestrian trail, parking, and a portion of the community gardens will be approximately 0.1 acres of impact. The total impact to woodlands comprises 10 percent of the total forested habitat in Jones Point Park.

Complete avoidance of all wetland and forest impacts is not possible while still accomplishing the purpose and need of the project. To manage resource impacts, several mitigation measures will be investigated and implemented. To replace impacted wetlands, the mitigation proposal would seek to create a non-tidal wetland in an open portion of land covered in exotic vines just east of Lee Street, which would connect to a large portion of existing forested wetland north of the bridge. Approximately 0.5 acres of wetland mitigation is proposed for the park. To reduce impacts to forested areas, efforts will be made to reforest portions of Jones Point Park including a buffer along the access road and the adjacent homes, treat and reforest invasive plant areas that have severely impacted existing forests, and avoid or minimize impacts to vegetation during design and construction of the improvements.

Concern Statement: Commenters indicate that assessment of tree loss as a result of parking in Alternative 1 is not properly evaluated.

Representative Quote: “When the City submitted our plan for parking, we said that it was conceptual in nature and that it would be laid out on the ground to avoid any of the large specimen trees. Yet the EA documents that it will cut down large specimen trees, and that is not true.”

NPS Response: The Environmental Assessment considered these impacts as potential impacts even though there would be the possibility to mitigate them in design and construction.

Concern Statement: Commenters believe the planned fields will be made of Astroturf and will impact wetlands and adjacent neighborhoods by increasing the potential for flooding.

Representative Quote: “The City plans to Astroturf these fields which will increase the water runoff in the remaining wetlands and increase the potential for flooding.”

Representative Quote: “I am concerned about the series of floods that we have had in the two years I have lived in Alexandria, and that this additional development [fields, clearing trees, filling in wetland and more parking] is going to exacerbate the flooding conditions we have already seen.”

Representative Quote: “These fields and parking lot would be built in a FEMA floodplain, potentially forcing water elsewhere, as in our direction [adjacent residential property]...”

NPS Response: The fields at Jones Point Park will not be made of synthetic material, and will be installed at or near existing grade with environmentally sensitive materials. To the maximum extent possible, the design of the field north of the bridge will be at-grade. In September 2005, a hydrology study and report was completed, the findings of which were included in the Environmental Assessment. See *Hydrologic and Hydraulic Analysis Report - Jones Point Park Drainage Study*. Under Preferred Alternative 4A, the multi-use field to be located north of the bridge will be designed to properly drain and dispose of water. Preferred Alternative 4A concentrates developments north of the bridge as far away as possible from the adjacent neighborhoods and the wetlands and woodlands on the north side of Jones Point Park. During design and construction, drainage improvements will include a properly graded field so as not to exacerbate drainage in that area.

Other proposed improvements at Jones Point Park include replacing a 24-inch culvert with twin 24-inch concrete culverts, building a new twin 36-inch culvert under the access road, and replacing twin 21-inch corrugated metal pipe. Culverts with a 2-foot by 6-foot box culvert will allow proposed storm water runoff to pass under the park roadways for the 2- through 10-year storm events and correct the small storm event flooding conditions currently being experienced in the park.

Cultural Resources

Concern Statement: Commenters suggest that increased active uses of the park could be contrary to mitigation measures identified from impacts from the WWB Project.

Representative Quote: “The natural and historic values of the Old and Historic District have already been substantially damaged by the original decision to extend the span of the Woodrow Wilson Bridge through the southern part of the District, and by the more recent decision to replace that span with an even wider bridge at the same location. The federal government has provided funds for the purpose of mitigating that damage to some extent. It would be an unfortunately elastic definition of the term if the result of the application of those funds were not to mitigate but to exacerbate the damage to the District through a significant intensification of the uses of the park and a consequent increase in noise and traffic impacts, and the loss of a portion of the woodland in the park that now serves to some extent as a "buffer" between the bridge span and the District.”

NPS Response: Preferred Alternative 4A places park improvements north of the bridge as far away as possible from the historic neighborhoods within the Old and Historic District. As mitigation for loss in forest due to some of the park improvements, reforestation will occur along the access road adjacent to the residential neighborhood most affected. This will create a natural vegetative cover that will serve as a visual and auditory buffer, both from the Woodrow Wilson Bridge, and from traffic along the park access road. Preferred Alternative 4A will not remove the additional 2.2 acres of forested area that would be removed in Alternative 1. In addition, the NPS will seek to improve the existing forest areas...by removing exotic species and reforesting, as appropriate.

Concern Statement: Commenters feel that a field south of the WWB is an inappropriate use of park land.

Representative Quote: “The NPS plan of one half-field on the south side of the bridge threatens the historical area around the lighthouse and river. This is not an appropriate mixed use area given the size of the park.”

Representative Quote: “Part of the mitigation efforts do include greater interpretation of this very rich prehistoric and historical site, and we find that an athletic field, especially one that would be very active and not informal, would be incompatible with the enjoyment of that type of interpretation.”

Representative Quote: “Alternative 1 separates in a sensible way the uses of the park for passive and active recreation. It preserves very well the recreation, historic, and archaeological attributes of Jones Point Park. The EA's preferred alternative is harmful to all of these uses. In addition, the EA fails to recognize and very substantially under-states and distorts the harm that the preferred alternative will do to historic and archaeological resources.”

Representative Quote: “Only by ignoring important facts, such as the preferred alternative's impact on historic/archaeological resources south of Woodrow Wilson bridge is the NPS able to contort the facts to allow for the preferred alternative.”

NPS Response: Preferred Alternative 4A would place a large field (110 x 60 YD) in the southern portion of Jones Point Park. This reflects an increase in field size compared with the preferred alternative presented in the EA. However, the majority of the new field would lie within the footprint of the existing soccer fields. In addition, the new field would be shifted closer to the bridge to move away from the cultural resources of the Shipway and the D.C. boundary line. The field will be centered as far away from the Jones Point Lighthouse as possible.

A primary interest for placing a recreational field within the historic area of Jones Point Park is to protect the natural woodland and wetland resources north of the bridge, and to maintain to the extent possible, a vegetative buffer between the adjacent residential community and the park, as well as from the effects (i.e. noise) from the Woodrow Wilson Bridge expansion. The design of the field will take into consideration the needs for cultural resource preservation and creating interpretive opportunities for those resources (i.e. trails, access and informational signage). Although the field will be in close proximity to the cultural resources of the Shipway and the D.C. boundary line, the ability to provide interpretive opportunities will still exist. Plans include exposing, treating, and then interpreting the historic remnants of the shipway. A form of demarcation will provide a means to interpret the D.C. Boundary line; however, the corner of the field will cut through and cause an interruption along a small portion of the line.

Archeological resources would require protection. During construction of the fields, clean fill would be placed on top of and essentially covering and encapsulating the archeological resource. In archeologically sensitive areas, special measures will be taken during construction so as not to cause impact to these areas. This may include fencing off areas, laying down matting, and appropriate and controlled use of equipment.

Although the presence of a multi-use field seems contrary to the desire for passive uses in the southern portion of the park, it is tempered by providing opportunities for historic interpretation and passive recreational activities in other areas of the park. Further opportunities for passive recreational activities will be available when the field is not in use.

Visitor Experience, Access, Transportation and Park Operations

Concern Statement: Commenters point out that two full-sized fields have always been planned as part of the Woodrow Wilson Bridge project at Jones Point Park since the project first began (refers to the Department of Transportation's mitigation agreement to provide replacement fields). Commenters claim that the NPS preferred alternative was part of earlier discussions and was never presented publicly during numerous meetings on park design.

Representative Quote: “Two fields was the original configuration of Jones Point, there is Congressional language in the bridge mitigation project that supports two fields, and it complies with Environmental regulations.”

Representative Quote: “It is of great concern that alternative 1 was approved and went through extensive public review, that 2 full fields have been part of the project since its inception and that alternative 4 designed by the NPS was NOT part of any earlier discussions.”

Representative Quote: “The City used a portion of the land for this purpose [fields] prior to the reconstruction of the new Woodrow Wilson bridge and I’ve not seen any compelling arguments put forth by the National Park Service as to why a portion of the land cannot again be used for this purpose.”

NPS Response: Based on the potential impacts to natural resources that would result from development of two fields north of the bridge, and substantial comments received in favor of developing two fields at Jones Point Park, the NPS modified the preferred alternative to include one small field (80 x 40 YD) north of the bridge and a larger field (110 x 60 YD) south of the bridge. Preferred Alternative 4A provides for a balance of active and passive uses of the park while ensuring the protection of natural and cultural resources. The alternative also considered the importance of locating park facilities north of the bridge as far away as possible from the adjacent community most affected by the Woodrow Wilson Bridge construction in an effort to best meet those concerns from the community, and mitigations identified to reduce noise and traffic impacts to the neighborhood.

Concern Statement: Event parking under the bridge is not feasible because of the security costs associated with operating the parking.

Representative Quote: “There should be no parking under the WWB even for special events (Alternatives 2, 3, & 4). Any parking under the bridge would require the city to force security personnel (police) to work excessive overtime.”

NPS Response: The EA does not state that the City will carry the full responsibility for policing and operations for event parking under the bridge. Depending on the nature of the event, and other considerations, the City and the NPS will discuss general security and law enforcement interests accordingly.

Concern Statement: Commenters believe the maintenance of fields would be high at Jones Point Park, which could result in less than adequate maintenance and appearance.

Representative Quote: “We are strongly in favor of having sufficient soccer fields for the community, but this is not the only alternative, nor is it really a wise one. The location and tendency to flood would require more than normal maintenance.”

Representative Quote: “The fact that the City of Alexandria has failed to make accommodation for the appropriate number of athletic fields to be established and maintained elsewhere within its jurisdiction serves as an alarm to us in the neighborhood that know that there is no justifiable excuse to encroach upon a forested federal park for the land for this purpose. The City of Alexandria wishes to obtain athletic field space, yet they often do not use operation and maintenance money that they need to maintain the parks they already have.”

NPS Response: Under Preferred Alternative 4A, the multi-use field to be located north of the bridge will be designed to properly drain and dispose of water according to the drainage needs outlined in the *Hydrologic and Hydraulic Analysis Report - Jones Point Park Drainage Study*. Although periodic flooding could potentially cover the field with water, the infrequency of these events should not cause excessive maintenance costs. Every effort will be made to ensure that the multi-use fields at Jones Point Park are adequately maintained.

Concern Statement: Commenters state that impacts to community facilities were not adequately addressed by loss or gain in fields. Youth at risk could suffer if athletic fields are not developed.

Representative Quote: “The Preferred Alternative in its assessment of impacts on environmental justice population indicates that there are no such populations within the project boundaries and that use of the park by environmental justice populations for fishing is the only use that must be assessed under the provisions of the EA....there are children that fall under this definition that have and could in the future use athletic fields....These at “risk youth” are highly correlated with the “environmental justice populations” that the NPS MUST address in the EA.”

NPS Response: Preferred Alternative 4A will provide multi-use fields both north and south of the bridge, play courts, a tot lot, and other passive recreational and historic interpretive activities that will benefit "at risk youth" as well as other members of the community.

Concern Statement: Commenters suggest that potential traffic volumes associated with athletic uses of Jones Point Park will negatively affect adjacent neighborhoods.

Representative Quote: “The assumptions about parking that can be accommodated in the park may already be overly optimistic, however, putting the neighborhood at risk. Fairfax County, Virginia assumes a need for 50 (not 40) spaces per field; and the Alexandria Recreation Department cautions that, when two games are scheduled in close sequence, the peak demand can double to accommodate arriving and departing vehicles. Two athletic fields, fully scheduled, might thus create a peak demand for as many as 200 parking spaces (plus the 30 spaces for general park visitors): manageable under the bridge in the original design, but well beyond what is provided now under any of the alternative concept designs.”

Representative Quote: “Jones Point Park's setting... can be accessed only by narrow streets through residential neighborhoods. It is far from an ideal location for facilities which are intended or expected to draw any substantial volume of vehicular traffic from all over the City of Alexandria and beyond.”

NPS Response: The analysis of parking needs and capacity used the City of Alexandria's standard of 40-75 spaces per field of regulation size depending on the intensity of use. Under Preferred Alternative 4A, 110 spaces provide adequate parking for two fields in use, plus 30 spaces for other park visitors, thereby minimizing the need to park in adjacent neighborhoods. In contrast to fields at other city parks, the fields at Jones Point Park are not expected to be used as intensely, therefore, parking is anticipated to be sufficient. The NPS would work with the City of Alexandria to insure an appropriate level of permitted activities on the playing fields. Between scheduled games there would be a small increase in traffic on the scale of a couple hundred cars per hour.

Concern Statement: Commenters point out that placing a tot lot closer to the river can pose safety hazards to children.

Representative Quote: “A couple of things I question is the tot lot right at the edge of the water....Down by the bulkhead there, it is not only deep for tall ships, but it doesn't even have a ladder if a dog or fisherman, or child falls in the water.”

NPS Response: The National Park Service agrees with the comments on this matter. Under Preferred Alternative 4A, the tot lot will be located further away from the waterfront on the west side of the multi-use field north of the bridge. This will provide a barrier and safe distance for children and parents who use the facility.

Concern Statement: Commenters state that large active playing fields are not the responsibility of the National Park Service.

Representative Quote: “It was probably not inappropriate that the Alexandria City Council would consider other factors specific to the needs of the city (such as the cost or suitability of other potential sites for playing fields in the city, the overall supply and demand for recreational facilities in the area, and the convenience and economy of using facilities in Jones Point Park for city employee parking) in its assessment of the options before it. But I respectfully submit that such considerations, while perhaps appropriate to Alexandria's city government, are not the proper purview or responsibility of the National Park Service. NPS/GWMP, rather, as its letter on the Environmental Assessment process suggests, should concentrate its focus on the Access and Circulation, Natural and Cultural Resource Management, and Visitor Activities considerations specific to Jones Point Park itself.”

Representative Quote: “It [Jones Point Park] just is not a suitable place in which to build a large soccer complex.”

NPS Response: National Park Service policies provide guidance on appropriate visitor uses and recreational activities in national park units:

The National Park Service will manage recreational activities according to the criteria listed in sections 8.1 and 8.2 (and 6.4 in wilderness areas). Examples of the broad range of recreational activities that take place in parks include, but are not limited to, boating, camping, bicycling, fishing, hiking, horseback riding and packing, outdoor sports, picnicking, scuba diving, cross-country skiing, caving, mountain and rock climbing, earth caching, and swimming. Many of these activities support the federal policy of promoting the health and personal fitness of the general public, as set forth in Executive Order 13266. However, not all of these activities will be appropriate or allowable in all parks; that determination must be made on the basis of park-specific planning.

Although multi-use fields may not be considered by everyone as a form of recreational activity typical of a national park, it is a recreational use found in various urban park settings where it serves the public interest. Through the EA process, the park has determined that multi-use fields are in keeping with the protection and preservation of other park natural and cultural resources without causing impairment or unacceptable impacts to natural and cultural resources or values. In addition, the NPS feels that multi-use fields are not a new recreational activity, and that the concepts for improving this use date back even before the 1984 Jones Point Park Implementation Plan, making this use consistent with the purpose for which the park exists. If it becomes clear that the use of multi-use fields is causing unacceptable impacts to park resources and values, the park superintendent can place limitations on the use or even prohibit the activity.

THIS PAGE INTENTIONALLY BLANK
