



FINDING OF NO SIGNIFICANT IMPACT

Memorial Circle Safety Improvements

George Washington Memorial Parkway, Virginia

The National Park Service (NPS) prepared an environmental assessment (EA) to evaluate the improvement to transportation safety at and near Memorial Circle (the Circle) along the George Washington Memorial Parkway (the Parkway) in order to reduce risks at key locations within the corridor and to reduce conflicts between drivers, bicyclists, and pedestrians while maintaining the memorial character of the area.

The purpose of taking action is to improve transportation safety at and near Memorial Circle while maintaining the memorial character of the area. The goals are to reduce risks at key locations within the corridor and to reduce conflicts between trail, walkway, and roadway users. The project is needed because of concerns regarding safety, which result from a number of issues related to heavy use of the area, at-grade crosswalks, challenging wayfinding, and unconventional road patterns. The project area is heavily used by both locals and tourists for both commuting and recreation. Project area users include motorists on the Parkway roads as well as bicyclists and pedestrians on the Mount Vernon Trail, which intersects the Parkway roads several times.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended [42 United States Code (USC) 4332(2) (C)]; the implementing regulations of the Council on Environmental Quality (CEQ) [40 Code of Federal Regulations (CFR) 1500-1508.9]; the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director's Order (DO) 12: *Conservation Planning, Environmental Impact Analysis and Decision-making* (DO-12) and the accompanying NPS NEPA Handbook. 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. As required by NPS *Management Policies 2006*, a finding of non-impairment is included as attachment A.

SELECTED ALTERNATIVE

The EA analyzed three alternatives: a no-action alternative (alternative A), the Improve Safety alternative (alternative B), and the Improve Safety and Reduce Conflicts alternative (alternative C).

The alternative selected by the NPS for implementation is alternative C (the NPS selected alternative), as described on pages 12–16 of the EA and depicted on figures 5–7 of the EA. The following summarizes the NPS selected alternative. Please see the EA for additional details of the NPS selected alternative.

Under the NPS selected alternative, the NPS will improve signage and striping throughout the project area as well as implement specific improvements at hotspots to reduce conflict and improve navigation for drivers, bicyclists, and pedestrians.

Signage improvements will be implemented throughout the project area. In the vicinity of exit ramps, wayfinding signs with directional arrows will be installed at exit gore areas to reduce confusion for drivers in advance of exit lanes. Yield signs and triangular pavement markings will be installed and

aligned to alert drivers where to yield to other traffic. Where possible, language on directional guidance signage will be simplified and the size of signage and lettering will be increased. In the vicinity of crosswalks, the NPS will improve signage to draw visual attention to crosswalks. These improvements will include fluorescent yellow pedestrian crossing warning signs (both in advance and at the crosswalk), vertical flexible lane delineators, and rectangular Rapid Flashing Beacon (RRFB) systems.

Modifications to lane striping will be undertaken where needed throughout the project area to reduce last-minute weaving by providing advanced guidance on destination and appropriate lane, improve the visibility of roadway and lane alignments, alert and slowdown drivers approaching crosswalks, and eliminate the inconsistency in maneuvers and striping. These improvements will include in-pavement lane guidance, raised pavement markings, transverse rumble strips, mini-skips, and lane separation/delineators. Speed limits will be posted in lanes to make clear the speed limit to motorists throughout the project area. Daytime speed enforcement will be increased through law enforcement and speed trailers to reduce vehicular speed throughout the project area.

Other improvements will be undertaken at specific hotspots to further improve safety and navigation. At hotspot 1, improvements would include modifications to lane striping and signage described above. At hotspot 2, located north of the Circle, Washington Boulevard will be reduced to one lane. Where the two roads merge, the roadway will be restriped to allow two lanes from S. Arlington Boulevard and one lane from Washington Boulevard to continue in their lanes. The existing southern exit ramp connecting S. Arlington Boulevard and S. Washington Boulevard will be removed along with the existing far left exit lane of S. Arlington Boulevard. To accommodate the shift in traffic, the northern exit ramp will be widened to allow two lanes of traffic to exit from S. Arlington Boulevard; the left lane will be an exit only lane, and the right lane will be a shared exit/through lane. This will require widening by up to 12 feet for a length of approximately 250 feet on the approach to the exit ramp and the exit ramp itself. This may require trimming or removal of one or two trees on the roadside of the exit ramp.

At hotspot 3, where S. Arlington Boulevard exits the Circle to the north, the roadway will be reduced from three lanes to two prior to the crosswalk to reduce the number of lanes pedestrians and cyclists are required to cross. Two lanes will enter the area from Arlington Memorial Bridge and continue north along S. Arlington Boulevard; one lane will enter from the Circle and merge into the left lane of S. Arlington Boulevard. The existing far left lane that currently exits onto the ramp to S. Washington Boulevard will be removed along with this exit ramp, as described above under hotspot 2.

At hotspot 4, circulation within the Circle itself will be modified such that drivers in the Circle will have the right of way and drivers entering the Circle will be required to yield. The Circle itself will be restriped to reduce from two lanes to one lane. These improvements will allow the Circle to function more like a typical modern roundabout.

At the east side of the Circle where it meets with Arlington Memorial Bridge, the existing island will be reconfigured into two smaller islands. This will allow the right two westbound lanes from Arlington Memorial Bridge to bypass the Circle and head north onto S. Arlington Boulevard, and the left westbound lane will enter the Circle.

On the south side of the Circle where Washington Boulevard enters the Circle, a small concrete island will be constructed to allow two northbound lanes from Washington Boulevard to bypass the Circle and enter Arlington Memorial Bridge, and one lane from Washington Boulevard will enter the Circle. This will require minor widening of the roadway at this intersection to accommodate the third lane and small island. The road will be widened between a few feet and up to 20 feet at its widest for a length of up to 90 feet.

At hotspot 5, the existing pedestrian and bicycle crossing will be relocated closer to the Circle, to allow pedestrians and bicyclists to cross where vehicle speeds are slower and where drivers are anticipating

conflicts. The location of the relocated crosswalk will need to be coordinated with the new island described above.

At hotspot 6, pedestrian warning signs with arrows will be installed along with fluorescent yellow advance pedestrian warning signs. Raised pavement markings will be introduced at this hotspot and the merge from two lanes to one would be maintained at the crosswalk to continue to enable a safer crossing of only one lane.

At hotspot 7, where Washington Boulevard merges and diverges south of the Circle, the roadway will be restriped and reduced from four lanes to three lanes to simplify merging patterns and reduce the number of lanes drivers would be required to cross when merging and diverging through the area. With this lane reduction, two lanes will enter the merge area from each the western and eastern roads. The left-most and right-most lanes will continue in their own lane while the two middle lanes will merge into one lane. The middle lane will then diverge into two lanes when the roads split; two lanes will exit the merge area towards the Circle, and two will exit towards the bypass under the Arlington Memorial Bridge.

At hotspot 8, in the vicinity of the crosswalk at the George Washington Memorial Parkway southeast of the Circle, the crosswalk will be relocated further north along the Parkway. The specific location of the relocated crosswalk will be determined at a future design phase of the project, but it could be moved between 300 and 400 feet north of its current location. The trail connection on either side of the roadway will be realigned to meet the relocated crosswalk. The roadway will be restriped to reduce the lanes from two lanes to one lane in the vicinity of the crosswalk.

At hotspot 9, improvements would include modifications to lane striping and signage described above.

At hotspot 10, where the Parkway exits the project area to the southeast, the southbound roadway will be widened to add an acceleration lane allowing traffic from Arlington Boulevard to enter the Parkway in its own dedicated lane before merging onto the two-lane Parkway. This will require widening of 10 to 12 feet for a length of approximately 225 feet. This may require trimming of a few trees and the removal or relocation of an existing tear-drop light post.

RATIONALE FOR DECISION

The NPS selected alternative C, Improve Safety and Reduce Conflicts alternative for implementation because it will provide the most improved safety conditions throughout the project area with minimal impacts on natural and cultural resources and the human environment. The combination of proposed improvements to signage, road striping, crosswalks, and road reconfigurations will provide safer routes throughout the project area and more intuitive navigation. Although there will be some alterations to the appearance, circulation patterns, and small-scale features of the project area, the overall historic character of the memorial landscape would be maintained. Alternative A (no action) would not meet the project's purpose and need because the current conditions of the roads, crossings, and trails is insufficient for the heavily used corridor. Under alternative A, no efforts would be undertaken to improve safety for drivers, cyclists, or pedestrians. Though alternative B would meet the purpose and need of the project, the actions would result in fewer safety improvements when compared to the NPS selected alternative. Drivers, pedestrians, and cyclists would continue to experience existing safety and navigation issues at several hotspots, including the atypical traffic pattern of the Circle itself. The NPS selected alternative has been refined through coordination with the DC State Historic Preservation Officer (SHPO), the Virginia SHPO, and the National Capital Planning Commission.

MITIGATION MEASURES

A variety of mitigation measures will be instituted as the actions are taken to implement the selected alternative. Although the exact mitigation measures to be implemented will depend upon the final design and approval of plans by relevant agencies, the following is a list of actions that could take place:

- Instruct all contractor employees on the sensitivity of the general environment and monitor their activities by NPS staff in order to mitigate and minimize potential impacts on natural and cultural resources during construction. Corridors for construction vehicle movement would be established and defined on the ground. Staging of construction equipment would be restricted to the road corridor, parking lots, and other identified previously disturbed areas to avoid impacts on natural resources.
- Clearly state all protection measures in the construction specifications, and instruct workers to avoid conducting activities beyond the fenced construction zone.
- Fence all areas in order to keep related disturbances within an NPS-defined and minimal impact area required for construction.
- Implement standard noise abatement measures during construction. Standard noise abatement measures could include the following elements: a schedule that minimizes impacts on adjacent noise-sensitive uses, the use of the best available noise control techniques wherever feasible, the use of hydraulically or electrically powered impact tools when feasible, and location of temporary noise sources as far from sensitive uses as possible.
- Minimize soil erosion by limiting the time that soil is left exposed and by applying other erosion control measures, such as erosion matting and silt fencing in construction areas to reduce erosion, surface scouring, and discharge to water bodies.
- Reseed all areas with native grasses or other NPS approved native vegetation.
- Remove invasive plants from construction areas using approaches prescribed in the NPS Integrated Pest Management Program.
- Implement measures to prevent invasive plants from returning to sites where they have been removed, such as ensuring that construction-related equipment arrives at the site free of mud or seed-bearing materials, and certifying that all seeds and straw material are weed-free.
- Rehabilitate areas that are temporarily disturbed during construction with native grasses and other native species as per NPS standards and consistent with the cultural landscape report and applicable historic planting plans.
- Implement measures such as fencing and monitoring to block visitor access to areas when needed to avoid visitor safety issues.
- Follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties and the Guidelines for the Treatment of Cultural Landscapes* for any restoration, rehabilitation, or renovation activities to historic structures and landscapes.
- Although archeological resources are unlikely to occur within the project area, immediately implement NHPA Section 106 procedures if any unknown significant archeological resources are uncovered during ground-disturbing activities. If previously unknown archeological resources are discovered during construction, all work in the immediate vicinity (600 feet) of the discovery shall be halted until the resources are identified and documented and an appropriate mitigation strategy developed, if necessary, in accordance with pertinent laws and regulations, including the stipulations of the 2008 Programmatic Agreement Among the NPS (US Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers.
- If needed, tree removal, clearing, and construction activities would not take place during the roosting and pupping season of the northern long-eared bat (June 1-July 31) to avoid disturbance to potential maternity roosts in the area. During future project phases, if it is determined that clearing or construction is needed during these seasons, the NPS would coordinate with the US Fish and Wildlife Service to ensure no impacts would occur.

- If tree removal or cutting is to be undertaken between April 1 and August 31, the NPS would conduct a nest survey for migratory nesting birds. If tree cutting or removal is to be undertaken between October 3 and April 1, the NPS would conduct a nest survey for bald eagles. If nests are observed within the project area, measures to avoid disturbance would be determined through coordination between the NPS, the US Fish and Wildlife Service, and/or appropriate state agencies. If nests are present, a biological monitor may be employed to prevent potential impacts to birds during construction activities undertaken during this period.

The 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.

ALTERNATIVES CONSIDERED

In addition to the NPS selected alternative described above, the EA analyzed a no-action alternative (page 7 of the EA) and one other action alternative (pages 7–11 of the EA).

FINDING OF NO SIGNIFICANT IMPACT

As described in chapter 3 of the EA, the NPS selected alternative will result in beneficial and/or adverse impacts on several park resources, including traffic and transportation, health and safety, visitor use and experience, and cultural resources. No significant impacts were identified that require analysis in an environmental impact statement, as described in chapter 3 of the EA. Anticipated impacts that will occur are summarized below by resource.

Traffic and Transportation. The selected alternative will result in both beneficial and adverse impacts on traffic and transportation. Beneficial impacts will generally result from improvements to wayfinding signage, striping, in-lane guidance, and lane reconfigurations that will allow drivers to more efficiently navigate through the project area. This will result in less driver confusion and fewer instances of last-minute lane changes, which will reduce the number of stops and improve traffic flow in many hotspots. Safety improvements at crosswalks will allow drivers to be more aware of crossings, which will improve the level of service (LOS) for pedestrians and bicyclists using crosswalks. Adverse impacts on traffic and transportation will generally result from a reduced LOS at certain hotspots, such as at hotspot 3 north of the Circle and hotspot 9 south of the Circle. Impacts will include increased queueing and an increase in the number of stops. However, safety will be improved throughout the project area. Temporary adverse impacts will also result during construction when lane closures will occur.

Health and Safety. The selected alternative will result in beneficial impacts on health and safety. Beneficial impacts will generally result from improved signage and lane striping that will reduce last-minute lane changes and weaving. In-pavement guidance, mini-skips, lane delineators, raised pavement markings, and rumble strips will work together with improved signage to increase driver awareness of approaching crosswalks, merges, weaves, and yields. At crosswalks, vertical flexible delineators and RRFBs will further draw drivers' visual attention to the approaching crosswalks. Roadway modifications at specific hotspots will simplify traffic patterns, reduce the number of lanes, and reduce the need to merge and weave. At the Circle, the change in traffic flow giving vehicles in the Circle the right-of-way will create a traffic pattern that is familiar to drivers, which will reduce confusion. Roadway modifications within the vicinity of crosswalks will improve crossing conditions for pedestrians and cyclists and will better alert drivers that there may be pedestrians or cyclists in the crosswalk. During construction, measures such as fencing and monitoring will be implemented to block visitor access to areas when needed.

Visitor Use and Experience. The selected alternative will result in both beneficial and adverse impacts on visitor use and experience. Beneficial impacts will generally result from modifications to signage, lane striping, and simplification of traffic patterns, which will assist visitors in understanding how to navigate

the confusing areas of weaves, merges, and diverges. At crosswalks, improved signage, lane delineators, and flashing beacons will direct driver attention to the crosswalks. This may lead to more drivers slowing or yielding at the crosswalk and may result in a more pleasant experience for crosswalk users who will likely feel more comfortable crossing where drivers are more alert. Additionally, the reduction of lanes in the vicinity of crosswalks at some hotspots will require pedestrians and cyclists to cross fewer lanes and will improve their line-of-sight. Adverse impacts will generally result from the increase in signage and RRFBs, which may result in a less pleasant experience for drivers who will experience flashing lights. Temporary adverse impacts will also result during construction when lane closures will occur and construction activity and noise will be experienced while enjoying the Parkway and trails.

Cultural Resources. The selected alternative will result in adverse impacts on cultural resources. The additional and larger signage as well as flashing beacons could detract from the important views and viewsheds to and from the project area and diminish the integrity of appearance, setting, and feeling. Specific locations, sizes, and design of signage will be determined at a future design phase and efforts will be undertaken to limit the adverse impacts on important views and viewsheds to the extent possible. Pavement markings will contribute to the changes in historic appearance and the diminished integrity of setting and feeling when combined with the addition of signs. However, because of existing topography and vegetation, these modifications will not be conspicuous from the entire project area, thus limiting the impacts to localized areas.

Changes in traffic patterns and roadway reconfigurations at some hotspots will result in changes to historic circulation patterns, vegetation, and small-scale features. The removal of the southern off-ramp north of the Circle will result in the loss of a historic circulation route that was constructed in 1943 as part of a larger road network update. However, this connection between Arlington Boulevard and S. Washington Boulevard is considered a non-contributing feature to the Lady Bird Johnson Park.

The widening of the exit ramp north of the Circle and for the acceleration lane in the vicinity of hotspot 10 will alter the historic appearance by increasing the amount of hardened pavement outside of the existing road prism. The trimming or removing of trees will result in a change in appearance and the loss of vegetation added as part of historic planting plans. One tear-drop light post may need to be relocated to accommodate for the widened roadway near hotspot 10. This will result in the alteration of a contributing small-scale feature of the Lady Bird Johnson Cultural Landscape. However, historic circulation patterns will not be altered, and the changes to the vegetation and small-scale features will be relatively minor when compared to the overall historic integrity and character that will remain.

Modification of the triangular traffic island on the east side of the Circle will result in the loss of some historic material and the alteration of a small-scale feature contributing to the cultural landscape of the Memorial Avenue Corridor. An additional new island will be constructed for the proposed slip lane on Washington Boulevard northbound on the south side of the Circle. This will alter the appearance of the Circle in that location and will somewhat alter the designed symmetry. However, the new islands will be designed to be compatible with the existing in terms of color and material. The overall character and circulation pattern of the Circle will remain.

The relocation of the existing crosswalk at hotspot 8 farther north will require the relocation of the existing trail connection between the Mount Vernon Trail and the trail to the west. This will slightly alter the circulation pattern in this location, though the historic north-south alignment of the Mount Vernon Trail will not be changed.

Cumulative Impacts. As described in chapter 3 of the EA, cumulative impacts were determined by combining the impacts of the actions associated with the NPS selected alternative with other present and reasonably foreseeable future actions. Cumulative actions include Arlington Memorial Bridge Rehabilitation and the North Section Rehabilitation from Spout Run to I-495/Capital Beltway. Impacts of the NPS selected alternative on impact topics of "Traffic and Transportation" and "Visitor Use and Experience" were identified. When considered with the other actions identified, the beneficial impacts of

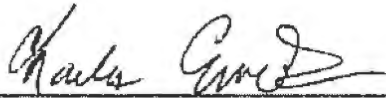
the NPS selected alternative will not be enough to offset the adverse impacts of the other rehabilitation projects during construction. However, once construction for the rehabilitation projects is complete, the cumulative adverse impacts will cease and the resulting reliable infrastructure will contribute an appreciable beneficial increment to the long-term cumulative impact. Therefore, the overall cumulative impact on both impact topics of "Traffic and Transportation" and "Visitor Use and Experience" will be adverse for the duration of construction and will be moderately beneficial in the long term.

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 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:



Charles Cuvelier
Superintendent
George Washington Memorial Parkway

5-13-2019

Date

Approved:



Lisa Mendelson-Ielmini
Acting Regional Director
National Capital Region

6/7/19

Date

ATTACHMENT A: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and NPS to manage units "to conserve the scenery and the natural and historic objects and wild life 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" (54 United States Code [USC] 100101). 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" (54 USC 100101).

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 NPS. 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.

NPS 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, NPS cannot allow an adverse impact that will constitute impairment of the affected resources and values (Section 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" (Section 1.4.5). To determine impairment, 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" (Section 1.4.5).

The *Memorial Circle Safety Improvements Environmental Assessment* analyzes impacts to the following resources: traffic and transportation, health and safety, visitor use and experience, and cultural resources. 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 cultural resources.

CULTURAL RESOURCES

There will be no impairment to the Parkway's historic structures or cultural landscapes under the selected alternative. Implementation of the NPS selected alternative will result in changes to the cultural resources in the project area due to the addition of non-historic features, alterations to circulation patterns, and changes to small-scale features. This will result in minor alterations to the historic appearance due to the addition of new and large signage and in-pavement markings, which will somewhat diminish the integrity of setting and feeling. This alternative will result in changes to historic circulation patterns through the removal of the southern exit from Arlington Boulevard to S. Washington Boulevard, the addition of slip lanes at the Circle, and the addition of the acceleration lane near hotspot 10. Alterations to the

contributing small-scale features include the reduction in size of the triangular granite island on the east side of the Circle at hotspot 4 and the relocation of a tear-drop light post at hotspot 10. Changes in vegetation include the trimming or removal of up to a few trees that were part of the 1968 Stone planting plan or the 1975 Palmer planting plan.

Although adverse impacts on cultural resources within the project area will occur, it will be a trade-off for improved transportation infrastructure, which supports an intense amount of use. This infrastructure, which consists of a series of interconnected road systems, is considered a fundamental resource and value in the Parkway's 2014 Foundation Document. When the cultural landscapes and historic setting of cultural resources are considered overall, the adverse impacts of the NPS selected alternative will not diminish the overall historic integrity of the George Washington Memorial Parkway, Lady Bird Johnson Park cultural landscape, Memorial Avenue Corridor, or Arlington Memorial Bridge. Actions will not alter high-priority or character-defining views and vistas, which are considered fundamental resources and values in the Foundation Document. Changes in views of the project area (indirect impacts on resources outside of the project area) will not diminish historic integrity of any of these resources. The Parkway driving experience, which is considered a fundamental resource and value in the Foundation Document will be retained and visitors will continue to be able to enjoy the green backdrop and scenic buffer along the urban corridor of metropolitan DC.

To ensure protection of cultural resources, all work will conform to the *Secretary of the Interior's Standards for the Treatment of Historic Properties* to the extent practicable. The NPS selected alternative is consistent with the purpose of the Parkway, which is to serve as a scenic roadway that "protects and preserves cultural and natural resources... and is part of a comprehensive system of parks, parkways, and recreational areas," as identified in the Foundation Document. The cultural resources affected by this project will retain their historic integrity and will continue to be eligible for listing in the National Register of Historic Places. Additionally, adverse effects on these historic properties will be mitigated through the memorandum of agreement signed by the NPS, the Virginia SHPO, the DC SHPO, and the National Capital Planning Commission (see attachment C).

SUMMARY

NPS has determined that the implementation of the selected alternative (alternative C) will not constitute an impairment of the resources or values of the park. As described above, implementing the selected alternative is not anticipated to impair resources or values that are essential to the purposes identified in the establishing legislation of the park, key to the natural or cultural integrity of the park, or identified as significant in the park's relevant planning documents. This conclusion is based on the consideration of the purpose and significance of the park, a thorough analysis of the environmental impacts described in the environmental assessment, relevant scientific studies, 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.

ATTACHMENT B: PUBLIC COMMENT RESPONSE

The *Memorial Circle Safety Improvements Environmental Assessment* (EA) was released for public review on November 26, 2018, and was available via the park's Planning, Environment, and Public Comment (PEPC) website (<http://parkplanning.nps.gov/gwmp>) and at the park headquarters. An open public comment period was opened on November 26, 2018 but was interrupted by a government shutdown on December 22, 2018. A second public comment period was held between February 6, 2019, and February 18, 2019, to compensate for the shutdown. During the comment periods, a total of 42 pieces of correspondence were received.

Many of the comments received were supportive of the project while also offering suggestions for ways to improve safety other than those presented in the alternatives in the EA. These comments offered suggestions for improving safety at the Circle, at crosswalks, and at areas outside of hotspots. Most of those suggestions were ideas that the National Park Service (NPS) previously considered but ultimately dismissed, as discussed in appendix A of the EA. Other commenters offered specific suggestions to improve upon the elements proposed in the alternatives, such as the types of lights to be used in the rectangular rapid flashing beacons (RRFBs) or locations of lane merges. One commenter suggested the use of specific design standards for signage, road, trail, and sidewalk improvements. Some commenters requested additional information regarding the impact of the project on traffic in the area.

According to NPS policy, substantive comments are those that 1) question the accuracy of the information in the EA, 2) question the adequacy of the environmental analysis, 3) present reasonable alternatives that were not presented in the EA, or 4) cause changes or revisions in the proposal. The discussion below includes concern statements expressed in the comments and topical responses to those concerns.

CONCERN

Crosswalk Suggestions. Some commenters expressed concerns over the improvements proposed at crosswalks and made suggestions for additional or alternate improvements for these areas, including implementing safety improvements at crosswalks outside of hotspots, removing stop signs along the Mount Vernon Trail (MVT) at crosswalks, using different types of RRFBs, and closing informal social trails.

Response

The NPS reviewed these concerns and suggestions. Some suggestions, such as the type of RRFBs, will be considered as the NPS moves forward with implementation of improvements. One commenter suggested adding improvements for the crosswalk along Washington Boulevard near the channel; however, this crosswalk is outside the scope of this project. A few commenters suggested the NPS address the safety issue of pedestrians and cyclists using an informal social trail to cross the George Washington Memorial Parkway (the Parkway) north of Arlington Memorial Bridge; however, closing of social trails is part of regular NPS operations and is outside of the scope of this project.

CONCERN

Circle Suggestions. Some commenters expressed concerns over the improvements proposed at the Circle and made suggestions for additional or alternate improvements for these areas, including extending traffic islands to create physical barriers between lanes and moving lane merges to provide more space for drivers to merge.

Response

The NPS reviewed these concerns and suggestions. Some suggestions, such as specific design of the modified islands surrounding the Circle as well as specific locations of merges, will be considered as the NPS moves forward with implementation of improvements.

CONCERN

Safety and Congestion Suggestions. Some commenters expressed concerns over the improvements proposed to address safety and congestion and made suggestions for additional or alternate improvements for this topic, including modifying the intersection of Route 110 and Memorial Avenue, modifying the location of the merge from Memorial Avenue eastbound entering the Circle, and using physical barriers at all road narrowing locations.

Response

The NPS reviewed these concerns and suggestions. Some suggestions, such as specific design of merges, will be considered as the NPS moves forward with implementation of improvements. A couple of commenters suggested modifying the intersection of Route 110 and Memorial Avenue to reduce congestion and improve safety of crosswalk users through traffic lights or reconfigured geometry; however, this intersection is outside the scope of this project.

CONCERN

Sign and Design Standards. One commenter recommended that the NPS revise their plans for signage to be consistent with MUTCD standards and that road, trail, and sidewalk improvements should be consistent with AASHTO standards.

Response

The NPS will keep these suggestions in mind as specific sign specifications and placement are determined. New regulatory and warning signage in the project area will comply with MUTCD standards to the extent possible; however, some factors such as existing geometry of the Parkway and the Circle limit the ability to locate signs at the recommended MUTCD distances in some cases. In these cases, the NPS will use engineering judgement or an engineering study to determine the appropriate location for these signs during the design phases of the project, per Section 1A.09 of the 2009 MUTCD. Additionally, the NPS has its own standard for sign panel design and may deviate from MUTCD standards for informational, directional, guide, and service signs as described in a 1973 Memorandum of Understanding between the NPS and the Federal Highway Administration Regarding Traffic Control Devices on Roads in National Parks, updated in 2006. Specific locations and configurations of merges, road narrowing, and crosswalk relocation will be determined during these future design phases of the project. Graphic representations of these improvements in the EA are for demonstration purposes only and do not represent actual design.

CONCERN

Impact Analysis. A few commenters requested some additional information about how the proposed improvements would affect the project area. Requests included the following:

- Alternative B, Hotspots 3 and 4: Giving priority to traffic in the Circle will make traffic worse south of the Circle. Provide an analysis of the effects of this change on traffic flow. Traffic

entering the Circle from the south already backs up past the Pentagon due to other merges in the area.

- Please clarify the benefit of installing “Raised Pavement Markings.”
- Hotspot 2: Impacts of dual ramp design may be understated due to speed reduction required for current curve radius.
- Hotspot 7: please show LOS impacts of reducing a lane in the weave section.

Response

The NPS has described the impacts of the alternatives as currently laid out in the impact-specific subsections of chapter 3 of the EA (pages 20-43). The Federal Highway Administration–Eastern Federal Lands Highway Division conducted multiple traffic models to maximize safety in the project area. Impacts of the dual ramp design near hotspot 2 and reducing the lane in the weave section at hotspot 7 were modeled to evaluate impacts to both safety and congestion (level of service). Raised pavement markings will improve driver awareness of lane markings through reflective lenses that will assist in drawing driver attention to merges, weaves, yields, and crosswalks. Impacts are based on the conceptual layout of the alternatives to date. The selected actions will be subject to additional design as the project moves ahead. During the process, the NPS will evaluate opportunities to reduce adverse effects with more detailed design. Impacts of the selected action on transportation and traffic (including anticipated level of service) are based upon the level of service assessed in 2015 when compared to the results of a 2018 modelling effort (documented in the *Memorial Circle Safety Improvements Plan/EA Traffic Modeling Report* as referenced in the EA).

**ATTACHMENT C:
MEMORANDUM OF AGREEMENT**

**MEMORANDUM OF AGREEMENT
AMONG
THE NATIONAL PARK SERVICE,
THE VIRGINIA STATE HISTORIC PRESERVATION OFFICE,
THE DISTRICT OF COLUMBIA HISTORIC PRESERVATION OFFICE,
AND
THE NATIONAL CAPITAL PLANNING COMMISSION
REGARDING
THE MEMORIAL CIRCLE SAFETY IMPROVEMENTS PROJECT**

This Memorandum of Agreement ("MOA") is made as of this 9th day of May, 2019, by and among the National Park Service (NPS), the Virginia State Historic Preservation Office (VA SHPO), the District of Columbia State Historic Preservation Officer (DC SHPO), and the National Capital Planning Commission (NCPC)(referred to collectively herein as the "Parties" or "Signatories" or individually as a "Party" or "Signatory"), pursuant to Section 106 of the National Historic Preservation Act ("NHPA"), 54 U.S.C. § 306108, and its implementing regulations 36 CFR Part 800 ("Section 106") regarding the Memorial Circle Safety Improvements Project (Undertaking); and

WHEREAS, the George Washington Memorial Parkway was established pursuant to what is known as the Capper-Crampton Act, Public Law 71-284, 46 Stat. 482, (May 29, 1930), and became a unit of the national park system pursuant to Executive Order 6166 of June 10, 1933 (taking effect August 10, 1933), and the George Washington Memorial Parkway (hereinafter "GWMP") is administered by the National Park Service (hereinafter "NPS"); and

WHEREAS, the NPS is charged in its administration of the units of the NPS System to meet the directives of other laws, regulations, and policies including the NPS Organic Act as codified in Title 54 United States Code (USC) 100101(a) to "conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations"; and

WHEREAS, the GWMP is a nationally significant historic property in Virginia, Maryland, and the District of Columbia listed in the National Register of Historic Places (hereinafter "NRHP") on June 2, 1995 as a historic district for its commemorative, design, and scenic qualities, and the 25 mile long parkway segment along the Potomac River west shore and 6.8 mile long segment along the Potomac River east shore and their settings are important landscape features that contribute to the significance of the GWMP; and

WHEREAS, Memorial Circle, which connects Arlington Memorial Bridge and Memorial Avenue, is located within the GWMP and is part of the nationally significant historic property *Arlington Memorial Bridge and Related Features* in Virginia and the District of Columbia and listed in the NRHP on April 4, 1980 as a historic property for its architectural and engineering design qualities; and

WHEREAS, the NPS proposes to implement safety improvements at Memorial Circle to reduce risks at key locations within the corridor and to reduce conflicts between drivers, bicyclists, and pedestrians while maintaining the memorial character of the area; and

WHEREAS, a Preferred Alternative (C-Improve Safety and Reduce Conflicts) was identified in the Environmental Assessment (hereinafter "EA") that was prepared pursuant to the National Environmental Policy Act (hereinafter "NEPA") as codified as 42 USC 4321, et seq.; and

WHEREAS, the NPS utilized the procedures for public involvement under NEPA to satisfy public involvement requirements under the NHPA as per 36 CFR § 800.8 and these efforts included, but were not limited to, a design charrette meeting with public agencies and stakeholders, scoping/consulting parties meetings, on-site trailside outreach informational sessions, a public newsletter, public meetings, and a project video; and

WHEREAS, the NPS Staff has solicited and considered the views of the public using its Planning, Environment and Public Comment (hereinafter "PEPC") apparatus and procedures pursuant to 40 CFR § 1500.2(d) and 40 CFR § 1506.6.; and

WHEREAS, pursuant to Section 106 federal agencies must take into account the effects of their undertakings on any district, site, building, structure or object that is included in or eligible for inclusion in the National Register of Historic Places, and afford the ACHP a reasonable opportunity to comment; and

WHEREAS, the NPS has determined that implementation of the proposed safety improvements at Memorial Circle as outlined in the Preferred Alternative of the EA is an undertaking (hereinafter "Undertaking") subject to Section 106 of the National Historic Preservation Act of 1966, as amended, (codified as 54 USC 300101, et seq.) and its implementing regulations at 36 CFR Part 800, as amended (hereinafter collectively referred to as "Section 106"); and

WHEREAS, the NPS, in consultation with the VA SHPO and the DC SHPO has established the Area of Potential Effects (hereinafter "APE"), as shown in Attachment A, for the Undertaking. The direct APE for the Undertaking is Memorial Circle and the Memorial Avenue corridor and the indirect or visual APE is defined as the viewshed of all proposed visual changes and construction associated with the Preferred Alternative; and

WHEREAS, the NPS, has consulted with the VA and DC SHPOs, pursuant to the *2008 Programmatic Agreement among the NPS (US Department of Interior), the Advisory Council on Historic Preservation (Hereinafter ACHP), and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the National Historic Preservation Act* (hereinafter "2008 PA") currently available at <http://www.achp.gov/npspa.pdf> and according to 36 CFR § 800.14(b)(1)(ii) and has determined that the Undertaking will have an adverse effect on Memorial Circle and the GWMP; and

WHEREAS, the NPS, in consultation with the VA and DC SHPOs, has determined that the Undertaking will have an adverse effect on Memorial Circle and GWMP from the partial removal of the traffic island at the east of Memorial Circle, road widening within the corridor,

and the introduction of visually intrusive signage and flashing beacons which will create views not compatible with the original design of GWMP (though not anticipated to create adverse effects to viewsheds of neighboring historic properties); and

WHEREAS, the Advisory Council on Historic Preservation (hereinafter "ACHP") was invited to consult on this Undertaking by the NPS through a letter of September 15, 2014 and did not respond; and criteria specified in Appendix A to 36 CFR Part 800 for ACHP involvement in consultation is not applicable for this Undertaking; and

WHEREAS, the ACHP was notified by the NPS on March 5, 2019 via email of an adverse effect determination through provision of the Assessment of Effects documentation meeting criteria specified in 36 CFR § 800.11(e) and was invited to comment; and hearing no response from the ACHP the NPS has successfully negotiated with the Signatories language for a MOA to resolve adverse effects; and criteria specified in 36 CFR § 800.6(a)(1)(i) for ACHP participation is not applicable for this Undertaking; and

WHEREAS, NCPC has approval authority over federal projects located within the District of Columbia pursuant to the National Capital Planning Act of 1952, 40 U.S.C. § 8722(b)(1) and (d) and this approval is a federal undertaking under Section 106 of the NHPA; and

WHEREAS, NCPC has elected to sign the MOA via communication with the NPS on September 8, 2014 in order to fulfill its Section 106 responsibilities; and

NOW, THEREFORE, the NPS, the DC and VA SHPOs, and NCPC agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the Undertaking on historic properties.

STIPULATIONS

The NPS shall ensure that the following measures are carried out:

A. MINIMIZATION

1. The NPS will minimize the Undertaking's adverse effect on historic properties by:
 - a. Restricting and minimizing ground and vegetation disturbance during construction.
 - b. Minimizing size of construction equipment and using minimally invasive construction methods.
 - c. Implementing land protection measures such as limiting tree removal.

The above minimization efforts shall be reflected in the Undertaking's final design plans.

B. MITIGATION

1. The NPS will mitigate the Project's adverse effect on historic properties by:
 - a. Developing updated planting plans based on plans from the 1930s and 1960s and implement replacement and screening plantings based on current needs.

- b. Updating interpretive and educational programming for the Memorial Circle and Memorial Avenue corridor in consultation with the VA and DC SHPOs.
2. The above mitigation measures will be completed within ten (10) years of the execution of this MOA.

C. SUBSTANTIAL DESIGN CHANGES

1. In the event that there are substantial design changes during the refinement or implementation stages of the Undertaking, the NPS shall reinitiate consultation with the VA and DC SHPOs and develop additional minimization and/or mitigation procedures as appropriate.

D. ARCHEOLOGY

1. There is not expected to be an archeological investigations requirement component for this Undertaking as the lands within the limits of disturbance were all created from dredged Potomac River fill used to create Columbia Island/Lady Bird Johnson Park. The GWMP and the National Capital Region of the NPS have archeologists on staff who meet the *Secretary of Interior's Professional Qualifications Standards* should an unanticipated find occur.
2. The NPS shall include provisions in the construction permit and documents for the treatment of unanticipated archeological discoveries, including human remains, during excavation, construction, or other ground-disturbing activities resulting from the Undertaking. In the event of an unanticipated discovery, the following stipulations shall occur:
 - a. In the event that a previously unidentified archeological resource is discovered during activities in the APE, the NPS shall immediately halt all ground-disturbing activities in the area of the resource and in the surrounding area where further subsurface remains can reasonably be expected to occur.
 - b. The NPS shall notify the appropriate SHPO by email and by telephone immediately upon discovery of previously unidentified archeological resources. The NPS, or its representatives, shall visit the site within forty-eight (48) hours of such notification, inspect the work site, and determine the nature and extent of the affected archeological property and establish a resource area. Construction may then continue outside the newly established boundaries of the resource area.
 - c. Within three (3) working days of the original notification of discovery, the NPS, in consultation with the SHPO and other Consulting Parties, shall determine whether the resource is potentially eligible for listing on the NRHP.
 - d. The NPS, in consultation with the VA and DC SHPOs and other consulting parties, shall ensure compliance with 36 CFR § 800.13. Work in the resource area shall not proceed until either: (a) the development and implementation of appropriate data recovery or other recommended mitigation procedures; or (b) the determination is made that the located archeological remains are not eligible for inclusion in the NRHP.
 - e. The NPS shall ensure that all investigations are conducted under the direct

supervision of an archeologist who meets or exceeds the pertinent qualifications in the *Secretary of the Interior's Professional Qualifications Standards*.

- f. All associated reports will meet contemporary professional standards, according to the Department of the Interior's *Format Standards for Final Reports of Data Recovery Programs* (42 FR 5377-79), and also meet the standards as set out in the VA SHPO's *Guidelines for Conducting Historic Resources Survey in Virginia* (2017) and DC SHPO's *Guidelines for Conducting Archaeological Investigations in the District of Columbia* (rev. 2018), as appropriate.
3. The NPS shall make all reasonable efforts to avoid disturbing gravesites and associated funerary artifacts. The NPS shall treat all human remains in a manner consistent with the ACHP's "Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects" (February 23, 2007; www.achp.gov/docs/hrpolicy0207.pdf) or ACHP policy in effect at the time remains and funerary artifacts are handled.
 - a. The NPS shall contact law enforcement and emergency personnel as appropriate in the jurisdiction where the human remains are discovered. The NPS shall immediately notify the VA and DC SHPOs of the discovery of human remains. The NPS shall ensure that all ground-disturbing activities in the immediate area of the discovery ceases immediately and will notify appropriate law enforcement officials.
 - b. If the remains are determined to be of Native American origin, the NPS shall comply with the provisions of the Native American Graves Protection and Repatriation Act, 25 USC § 3001 et seq. and the accompanying regulations at 43 CFR Part 10. If the remains appear to be of historic origin and not Native American, the NPS will consult with the VA and DC SHPOs and other Consulting Parties as appropriate on the appropriate treatment.
 - c. The NPS shall use reasonable efforts to ensure that the public is excluded from viewing any burial site or associated funerary artifacts. Subject to applicable law, the VA and DC SHPOs and the Consulting Parties to this MOA shall release no photographs or images of any burial site or associated funerary artifacts to anyone, including the press and the public. If they do release such photographs or images, accidentally, voluntarily, or pursuant to applicable law, they shall notify the NPS and the other consulting parties as soon as possible. The NPS shall notify the appropriate federally recognized tribes when burials, human skeletal remains, or funerary artifacts are encountered on the project.

E. PROFESSIONAL QUALIFICATIONS

All cultural resource work performed under the terms of this MOA shall be carried out by or under the direct supervision of a professional who meets the *Secretary of the Interior's Professional Qualifications Standards* (48 FR 44739) in the appropriate discipline.

F. DISPUTE RESOLUTION

1. Should any Signatory to this MOA object at any time to any actions proposed, or the manner in which the terms of this MOA are implemented, the other Signatories shall

consult with the objecting Party(s) to resolve the objection. If the NPS determines that such objection(s) cannot be resolved through this consultation, the NPS will:

- a. Forward all documentation relevant to the dispute to the ACHP and the other Parties of the dispute in accordance with 36 CFR § 800.2(b)(2). Upon receipt of adequate documentation, the ACHP shall review and advise the GWMP on the resolution of the objection within 30 days from date of receipt (hereinafter "Dispute Period"). Any comment provided by the ACHP, and all comments from the Parties to the MOA, will be taken into account by the NPS in reaching a final decision regarding the dispute.
- b. If the ACHP does not provide comments within the Dispute Period, the NPS may render a decision regarding the dispute. In reaching its decision, the NPS will take into account all comments regarding the dispute from the Signatories to the MOA.
- c. The NPS's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged. The NPS will notify the other Signatories of its decision in writing prior to implementation of the portion of the Undertaking that is subject to dispute under this stipulation. The NPS's decision will be final.
- d. At any time during implementation of the measures stipulated in this MOA, should an objection pertaining to this MOA or the effect of the Undertaking on historic properties be raised by a member of the public, the NPS shall notify the Signatories to this MOA and consult with the objector to resolve the objection.

G. ANTI-DEFICIENCY ACT

The NPS's obligations under this MOA are subject to the availability of appropriated funds, and the stipulations of this MOA are subject to the provisions of the Anti-Deficiency Act. The NPS shall make reasonable and good faith efforts to secure the necessary funds to implement this MOA in its entirety. If compliance with the Anti-Deficiency Act alters or impairs the NPS's ability to implement the stipulations of this MOA, the NPS shall consult in accordance with the amendment and termination procedures found later in this MOA.

H. TERMINATION

1. If any Signatory to this MOA determines that its terms will not or cannot be carried out, that Signatory shall immediately consult with the other Signatories to attempt to develop an amendment per Stipulation J. If within thirty (30) calendar days after consultation (or another time period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the MOA upon written notification to the other Signatories.
2. Should the MOA be terminated, the NPS shall either consult in accordance with 36 CFR § 800.14(b) to develop a new MOA or comply with 36 CFR Part 800 for individual undertakings related to the project.

I. ANNUAL REPORT

1. On or before January 31 of each year following the execution of this MOA, the NPS shall prepare and provide to the other Signatories of this MOA an annual report addressing, at a minimum, the following topics:

- a. a general summary of how this MOA has been accomplished during the preceding year;
 - b. the NPS's assessment of the effectiveness of this MOA; and
 - c. any recommendations the NPS may have for improving the MOA.
2. The other Signatories shall have the opportunity to review the annual report within thirty (30) calendar days of its receipt and to provide comments to the NPS. Any objections to the handling of specific details of the Undertaking or the way the MOA is implemented may be assessed using the process outlined in Stipulation F. The NPS shall make the annual report available to the public on its PEPC website.

J. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the day the fully executed amendment is filed with the ACHP.

K. DURATION

This MOA will terminate ten (10) years from the date of its execution. Six (6) months prior to such time, the NPS shall consult with the other Signatories to reconsider the terms of the MOA and amend the MOA, if its terms have not been fulfilled.

L. ELECTRONIC COPIES.

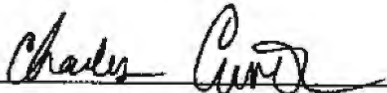
Within one (1) week of the last signature on this MOA, the NPS shall provide each Signatory with one legible, color, electronic copy of this fully-executed MOA and all of its attachments. Internet links shall not be used as a means to provide copies of the attachments since web-based information often changes. If the electronic copy is too large to send by email, the NPS shall provide each Signatory with a copy of this MOA on an external digital storage device.

EXECUTION of this MOA by the NPS, the VA and DC SHPOs, and the NCPC, and the filing of the MOA with the ACHP pursuant to 36 CFR §800.6(b)(iv) and the implementation of its terms is evidence that the NPS has taken into account the effects of the Undertaking on historic properties and afforded the ACHP an opportunity to comment.

SIGNATURES FOLLOW ON SEPARATE PAGES

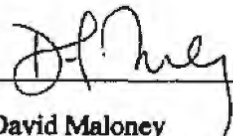
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THE DISTRICT OF COLUMBIA HISTORIC PRESERVATION OFFICE,
AND
THE NATIONAL CAPITAL PLANNING COMMISSION
REGARDING
THE MEMORIAL CIRCLE SAFETY IMPROVEMENTS**

NATIONAL PARK SERVICE

 Date: 5-9-2019
Charles Cuvelier, Superintendent
George Washington Memorial Parkway

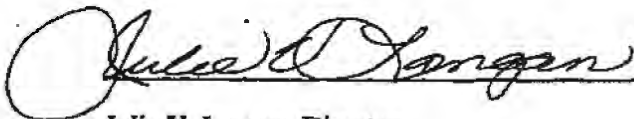
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DC HISTORIC PRESERVATION OFFICE

 _____ Date: 5/13/2019
David Maloney
District of Columbia State Historic Preservation Officer

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VIRGINIA STATE HISTORIC PRESERVATION OFFICE

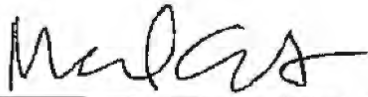


Date: 5/20/19

Julie V. Langan, Director
Department of Historic Resources

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THE MEMORIAL CIRCLE SAFETY IMPROVEMENTS**

NATIONAL CAPITAL PLANNING COMMISSION



Date: May 23, 2019

Marcel C. Acosta
Executive Director

Attachment A

AREA OF POTENTIAL EFFECT

National Park Service
US Department of the Interior
George Washington Memorial Parkway
Maryland, Virginia, Washington DC



George Washington Memorial Parkway
Memorial Circle Safety Improvements

