



FINDING OF NO SIGNIFICANT IMPACT

GEORGE WASHINGTON MEMORIAL PARKWAY PARKLAND RESTORATION PLAN

Bethesda, Maryland

The National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed Parkland Restoration Plan (the Plan) for the George Washington Memorial Parkway and the Chesapeake and Ohio (C&O) Canal National Historical Park. The Plan identifies drainage improvements and seeks to resolve sedimentation issues on parkland downstream of the Intelligence Community Campus-Bethesda (ICC-B) in Bethesda, Maryland. The purpose of the proposed project is to improve the long-term ecological function and drainage of two stream channels, stabilize a non-natural erosion channel, and resolve sedimentation issues on NPS land that is downstream of the ICC-B.

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

SELECTED ALTERNATIVE

Based on the analysis presented in the EA, NPS selected Alternative B: Action Alternative (page 7 of the EA) for implementation. Implementation will occur when funding becomes available. The Plan outlines multiple park restoration measures focused primarily on three channels: the Wapakoneta, Midsite, and Southwest Channels. The Plan also identifies measures to occur within the project area.

The Wapakoneta and Midsite Channels will both include the following elements (pages 7 and 8 of the EA):

- Vegetated swale stabilization with grading, erosion control, replanting, or mulch.
- Removal of blockages from trees limbs and trunks, as well as other debris present.
- Use of sandy clay backfill to stabilize banks with coir blacks, fabric, or other materials.
- Use of riprap at the headwall on the Wapakoneta Channel and the culvert outlet on the Midsite Channel downstream of MacArthur Boulevard path to prevent additional scouring.
- Sediment removal from C&O Canal at its intersection with the Wapakoneta and Midsite Channels.

At the Wapakoneta Channel, the Plan will protect the upstream outlet from the ICC-B campus by creating a step pool from stone to avoid downstream erosion (page 7 of the EA). At the Southwest Channel, a non-natural erosion channel, the existing gully eroded by stormwater in areas northeast and southwest of MacArthur Boulevard will be filled (page 8 of the EA). A series of timber wall bulkheads will be installed across the eroded gully and then filled with soil or appropriate fill materials. The channel will then be planted with native vegetation. Site-wide, invasive vegetation will be removed in order to improve the local ecology and to prevent the colonization by new invasive vegetation at locations disturbed by implementation of the Plan (page 8 of the EA).

RATIONALE FOR DECISION

The NPS selected Alternative B for implementation because it best meets the purpose and need of the Parkland Restoration Plan, as it will improve the long-term ecological function and drainage of two stream channels, stabilize a non-natural erosion channel, and resolve sedimentation issues on NPS land that is downstream of the ICC-B.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. Mitigation measures outlined in the EA are presented as Attachment A.

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As documented in the EA, the selected alternative has the potential for adverse impacts on historic buildings and structures, cultural landscapes, archeological resources, wetlands, and vegetation; however, the NPS has determined that the selected alternative can be implemented without significant adverse effects, as defined in 40 CFR §1508.27.

Implementing the Plan will result in detectable direct and indirect beneficial and adverse impacts on historic buildings and structures, including the George Washington Memorial Parkway (including the Clara Barton Parkway) and the C&O Canal National Historical Park Historic District through the revegetation of the wooded landscape, removal of non-native species, and the clearing of blockages of Culverts 2 and 9. Temporary detectable adverse impacts on the George Washington Memorial Parkway will occur during construction, but will be minimized through planning of routes.

Implementation of the Plan will have beneficial impacts on the C&O Canal National Historical Park as a result of drainage improvements, but could have temporary adverse impacts on the C&O Canal National Historical Park during the construction phase. During the sediment removal and drainage improvements, work will occur adjacent to and within the canal and towpath. In order to ensure historic features related to the C&O Canal structure are not damaged, NPS will develop strategies in consultation with the Maryland Historical Trust.

Invasive vegetation removal, vegetation restoration, grading, and clearance of pathways for construction access will disturb portions of the Area of Potential Effect (APE) that have potential for archeological resources. These efforts will be concentrated adjacent to the existing channels. In order to avoid and minimize potential adverse impacts, a Phase IB archeological survey will include systematic pedestrian survey, mapping, and judgmentally placed shovel testing within areas of less than 15 percent slope and within proposed construction access and staging areas rather than along the channels themselves. If determined appropriate, archeological monitoring will take place during construction.

Implementation of the Plan will result in beneficial impacts on wetlands, as it will remove debris, stabilize slopes and vegetation, and use stone or riprap to protect outfalls and channels from scour within wetlands. The improvements will provide ecological uplift to functions for the three riverine wetlands, including fish and shellfish habitat, wildlife habitat, groundwater recharge, sediment and shoreline stabilization, recreation, education/scientific value, and uniqueness/heritage. Temporary adverse impacts could occur during the construction phase of the project due to soil disturbance. In order to minimize the potential impacts, appropriate erosion and sediment control measures, best management practices (BMPs), and stormwater management measures will be implemented throughout the course of construction of the channel improvements, consistent with applicable federal, state, and Montgomery County regulations. Efforts will be made to limit disturbance by mechanical equipment through the placement of construction access routes to avoid large trees or other features. Mechanical equipment will be limited, to the extent practicable, to small duty equipment to minimize disturbance of soil.

Implementation of the Plan will result in beneficial impacts on vegetation through stabilized streambanks, planting of native vegetation, stabilization or removal of undercut trees, and the removal of invasive species. The proposed action will fill the Southwest stream channel and cover with native vegetation,

restoring the vegetated character of the gully. Vegetation could be adversely affected temporarily during construction. In order to minimize impacts on vegetation, efforts will be made to limit the disturbance by mechanical equipment. The exact placement of these routes will avoid large trees or other features. Mechanical equipment will be limited, to the extent practicable, to small duty equipment. The construction route will be developed to minimize the number and size of trees removed.

CONCLUSION

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

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

Recommended:

Charles Cuvelier
Charles Cuvelier
Superintendent
George Washington Memorial Parkway
Region 1 - National Capital Area

9-20-2019
Date

Recommended:

Kevin D. Brandt
Kevin Brandt
Superintendent
Chesapeake and Ohio Canal National Historical Park
Region 1 - National Capital Area

9/10/2019
Date

Approved:

Lisa A. Mendelson-Ielmini
Lisa A. Mendelson-Ielmini
Acting Director
Region 1 - National Capital Area

9/12/19
Date

Documents appended to the FONSI include:

- Appendix A: Mitigation Measures;
- Appendix B: Non-impairment determination;
- Appendix C: Response to public comments; and
- Appendix D: Section 106 coordination letters
- Appendix E: Errata

APPENDIX A: MITIGATION MEASURES

Historic Structures and Buildings

During the sediment removal and drainage improvements, work will occur adjacent to and within the canal and towpath. Impacts on the C&O Canal National Historical Park will be minimized by ensuring drainage improvements involving the historic canal are developed in a manner consistent with the secretary of the Interior's *Standards for the Treatment of Historic Properties*. In order to ensure that the cultural resources of the C&O Canal National Historical Park is not damaged, NPS will develop strategies in consultation with the Maryland Historical Trust.

Archeological Resources

A Phase IB survey will include systematic pedestrian survey, mapping, and judgmental shovel testing within areas of less than 15 percent slope and within proposed construction access and staging areas rather than along the channels themselves, which are steeply sloped and previously disturbed. If determined appropriate, archeological monitoring will take place during construction. If archeological resources are discovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy can be developed. Consultation with NPS, and/or the NPS regional archeologist and the Maryland Historical Trust will be coordinated to ensure that the protection of the resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 United States Code 3001) of 1990 will be followed.

Wetlands

Appropriate erosion and sediment control measures, BMPs, and stormwater management measures will be implemented throughout the course of construction of the channel improvements, consistent with applicable federal, state, and Montgomery County regulations. Efforts will be made to limit disturbance by mechanical equipment through the placement of construction access routes to avoid large trees or other features. Mechanical equipment will be limited, to the extent practicable, to small duty equipment to minimize disturbance of soil.

Vegetation

Construction routes would be selected in order to avoid impacts on vegetation and steep topography to the extent possible. Carrying equipment and materials in by hand will be the preferred method, and any mechanical equipment will be limited to small duty equipment (i.e., Gator utility vehicle or bobcat). Efforts will be made to limit the disturbance by mechanical equipment. Where mechanical equipment is needed, the route will be covered in mulch to protect the soils, and the alignment of these routes will avoid large trees or sensitive resources. At the Southwest Channel, it is anticipated that mechanical equipment will be based along MacArthur Boulevard, with fill materials pumped to the channel. The NPS will coordinate with the Maryland Department of Natural Resources Forest Service in order to comply with the Forest Conservation Act.

APPENDIX B: NON-IMPAIRMENT DETERMINATION

By enacting the National Park Service (NPS) Organic Act of 1916 (Organic Act), Congress directed the US Department of Interior and the NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (54 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).

NPS Management Policies 2006, Section 1.4 explains the prohibition on impairment of park resources and values. While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

This determination on impairment has been prepared for the selected alternative described in this Finding of No Significant Impact. An impairment determination is made for the resource topics of historic structures and cultural landscapes. These resources are considered fundamental to the George Washington Memorial Parkway and the Chesapeake and Ohio (C&O) Canal National Historical Park because of the historical significance of the parks. An impairment determination is not made for visitor use and experience because impairment findings relate back to park resources and values, and these impact areas are not generally considered to be park resources or values according to the Organic Act and cannot be impaired in the same way that an action can impair park resources and values. This determination on impairment has been prepared for the action alternative described in Chapter 2 of the George Washington Memorial Parkway Parkland Restoration Plan EA.

HISTORIC STRUCTURES AND BUILDINGS

The project area includes multiple historic properties in both parks, including the George Washington Memorial Parkway (including the Clara Barton Parkway) Historic District and the C&O Canal National Historical Park Historic District. The stabilization and replanting of stream channels with native vegetation, the filling of the Southwest Channel, the site-wide removal of invasive species, and the clearing of culverts would result in beneficial and adverse impacts on historic buildings and structures, including the George Washington Memorial Parkway Historic District (including the Clara Barton Parkway) and C&O Canal National Historical Park Historic District through the revegetation of the wooded landscape, removal of non-native species, and the clearing of blockages of Culverts 2 and 9. The Plan would result in beneficial impacts to the structures that make up the C&O Canal National Historical Park Historic District as a result of drainage improvements. Overall, the Plan would not diminish the character of the historic resources.

Temporary detectable adverse impacts on the George Washington Memorial Parkway would occur during construction, but would be minimized through planning of routes. Temporary adverse impacts on the C&O Canal National Historical Park could occur during the construction phase. In order to ensure the C&O Canal National Historical Park is not damaged, NPS would develop strategies in consultation with the Maryland Historical Trust. Therefore, there will be no impairment to the park’s resources related to historic structures because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

ARCHEOLOGICAL RESOURCES

Multiple archeological resources are known to be present in the project area. Invasive vegetation removal, vegetation restoration, grading, and clearance of pathways for construction access would disturb portions

of the APE that have potential for archeological resources. The NPS would undertake a Phase IB survey that includes systematic pedestrian survey, mapping, and judgmental shovel testing within areas of less than 15 percent slope and within proposed construction access and staging areas. If determined appropriate, archeological monitoring would take place during construction. Implementation of the Plan would have beneficial impacts on the cultural resources of C&O Canal National Historical Park as a result of drainage improvements, but could have adverse impacts on the C&O Canal National Historical Park during the construction phase. In order to ensure the cultural resources of C&O Canal National Historical Park are not damaged, NPS would develop strategies in consultation with the Maryland Historical Trust. Therefore, there will be no impairment to the park's resources related to archeological resources because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

WETLANDS

The project area contains multiple wetlands. Implementation of the Plan would remove debris, stabilize slopes and vegetation, and use stone or riprap to protect outfalls and channels from scour within wetlands. Alternative B would provide ecological uplift to functions for the three riverine wetlands, including fish and shellfish habitat, wildlife habitat, groundwater recharge, sediment and shoreline stabilization, recreation, education/scientific value, and uniqueness/heritage. Temporary adverse impacts could occur during the construction phase of the project due to soil disturbance. In order to minimize the potential impacts, appropriate erosion and sediment control measures, BMPs, and stormwater management measures would be implemented throughout the course of construction of the channel improvements, consistent with applicable federal, state, and Montgomery County regulations. Efforts would be made to limit disturbance by mechanical equipment through the placement of construction access routes to avoid large trees or other features. Mechanical equipment would be limited, to the extent practicable, to small duty equipment to minimize disturbance of soil. Therefore, there will be no impairment to the park's resources related to wetlands because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

VEGETATION

Implementation of the Plan would stabilize streambanks, plant native vegetation, stabilize or remove undercut trees, and remove invasive species. The proposed action would fill the Southwest stream channel and cover with native vegetation, which would restore the vegetated character of the gully. Implementation of the Plan could temporarily adversely affect vegetation during construction. In order to minimize impacts on vegetation, efforts would be made to limit the disturbance by mechanical equipment. The exact placement of these routes would avoid large trees or other features. Mechanical equipment would be limited, to the extent practicable, to small duty equipment. The construction route would be developed to minimize the number and size of trees removed. Therefore, there will be no impairment to the park's resources related to vegetation because no major, long-term, adverse impacts to those resources would occur from implementation of the preferred alternative.

APPENDIX C: PUBLIC COMMENT RESPONSES

Topic	Concern Statement	Response
Tribal Consultation	Continue the ongoing Tribal consultation, and note the processes for addressing inadvertent uncovering of archeological sites or artifacts.	Mitigation identified in Appendix B of this FONSI describes the process for stopping work and consultation in such an event.
Support for Action Alternative	General support for the parkland restoration projects.	Comment noted.
Inadequacy of Title	The EA's title, "GWMP Parkland Restoration Environmental Assessment" does not reflect the subject matter the EA addresses.	The title reflects the restoration efforts envisioned for the site. GWMP is called out because the GWMP park unit is the lead NPS unit for the project.
Inadequacy of project to meet purpose and need	Project does not sufficiently address or provide calculations for stormwater management at the site.	The EA evaluates environmental impacts for the proposed parkland restoration in order to inform decision makers. The proposed action is a concept; the EA is not intended to provide a catalogue of detailed past, present, and future conditions
	Projects will not be sufficient to improve drainage and resolve sedimentation issues on parkland, including restoration of Culvert #2 function.	Comment noted. The removal of debris and sediment would help to improve water flow through the culvert. This EA does not address physical restoration of the culvert itself, but assesses impacts associated with the parks' proposal to facilitate stormwater flows.
	EA does not consider the relative levels of whether the nearby Dam 1 impedes ability of outflow from culvert to Potomac River due to topography.	Comment noted. The river level near Dam 1 is an existing condition and this EA does not propose nor analyze effects of lowering the water level of the river.
	The plan does not fully document or address sedimentation throughout the site, including the C&O Canal and the Southwest channel.	Comment noted. Exact delineation of alluvial deposits to be removed from the canal will be determined by NPS prior to remediation. Comprehensive dredging of the Canal is beyond the scope of this project.

Topic	Concern Statement	Response
	The project does not address culverts and surface flows under the trolley right-of-way.	The project includes removal of debris in culverts under the trolley right-of-way, as shown in Figures 5 and 7.
	The project does not adequately address damage to the forest surrounding the "Riverine Wetlands."	Comment noted. The forest surrounding the Riverine Wetlands is primarily intact. As stated on Page 8 of the EA, "Invasive vegetation would be removed in order to improve the local ecology and to prevent the colonization by new invasive vegetation at locations disturbed by the Action Alternative."
Inadequacy of project area	The project area does not include non-NPS lands; the area of potential effect (APE) does include non-NPS properties.	Comment noted. NPS is not responsible for the actions of other property owners/managers. The APE includes non-NPS properties. The NPS is responsible for the effects of its actions on historic properties outside its jurisdiction.
	The project area includes areas that are extraneous to the project, such as the Little Falls Dam.	The project area provides context for the activities of the proposed action.
Inaccuracy	The description of ICC-B improvements are not accurate.	See Errata.

Topic	Concern Statement	Response
Impact Topics	The EA should analyze the impacts of the alternatives on Stormwater Management and wildlife habitat and the biodiversity of the ecosystem.	<p>NPS does not consider stormwater management a resource.</p> <p>As stated on Page 7 of the EA, "Neither of the alternatives analyzed in the EA would have a measurable impact to water quality of the Potomac River. The Wapakoneta Channel would continue to confluence with the Potomac River at lower flows, but would also run into the Potomac River at higher flows after implementation. The Midsite Channel would continue to confluence with the C&O Canal. The overall quality of water entering the channels and the C&O Canal would remain the same under the proposed action with the exception of a reduction in sediment. Therefore, this topic was dismissed from further analysis."</p> <p>As described on Page 6 of the EA, the NPS dismissed the potential for the project to impact threatened and endangered species and common species of wildlife due to the minimal level of site disturbance.</p>
Alternative Recommendations	The plan should include restoration of canal where it has been breached by storm flows in the Wapakoneta and Midsite streams, removal of invasive species, and replanting of native plants.	The need for additional minor, site-specific actions will be addressed by NPS during implementation of the project. The removal of invasive species and replanting of native plants in areas disturbed by the Action Alternative is identified on Page 8 of the EA.

Topic	Concern Statement	Response
Alternative Descriptions	It is very difficult to understand exactly what is planned in Alternative B. The EA provides little or no text describing the details of each action, and in some instances contradictory details are provided. Also, the drawings are difficult to read.	<p>The proposed action is a concept, and therefore does not specify the details of the action.</p> <p>The description of the action alternative is conceptual in nature and provides enough description on what could occur at each site to access the impacts that would occur if implemented. When funding becomes available, design drawings will be done, and should any of the drawings differ too greatly from what is presented in the current EA, compliance will be revisited.</p>
Inadequate Public Outreach	The project did not adequately include coordination of other agencies, including MDE, or input from the public.	The correspondence included in Appendix C represents communication required to fulfill the NPS's responsibilities under the NHPA and the Endangered Species Act. The complete catalog of public comment is part of the Administrative Record. Public comments are not included in Appendix C.
	The Glen Echo Heights Citizens Association is the only resident association listed separately.	Comment noted.
Construction Routes	Alternative construction routes should be considered to avoid and minimize impacts on vegetation and other resources.	See ERRATA. NPS documented access points based on feasibility and anticipated construction methods, illustrating the routes with the most potential for adverse impacts on resources. During implementation, routes will be evaluated to determine the routes that could best avoid and minimize resource impacts.
Status of Memorandum of Intent	MOI expired in 2018, and therefore funding may be unavailable.	Comment noted.

Topic	Concern Statement	Response
Cumulative Impacts	The cumulative impact projects did not include the High Acres Development as a cumulative impact project, while other projects would not have beneficial impacts and sedimentation issues at the site.	The High Acres Development is out of the stormwatershed, and it does not affect NPS property directly. The overall contribution to any ecological uplift from the parkland restoration would likely have no noticeable cumulative impact on surrounding areas.
Natural Heritage Resources	No natural heritage resources have been identified at the project site. If the scope changes, please coordinate with the Virginia Department of Conservation and Recreation's Division of Natural Heritage (DCR).	Comment noted. NPS will coordinate with DCR and the Maryland Department of Natural Resources as needed.
No Action Alternative Analysis	The deterioration of parkland would continue under the No Action Alternative.	Because the ICC-B campus stormwater management improvements have been implemented, new deterioration of historic buildings and structures, wetlands and vegetation would not occur.

Topic	Concern Statement	Response
Historic Buildings and Structures	<p>The EA's conclusion about the "Impacts of Alternatives B – Action Alternative" (P. 23 of 37, "Conclusion"): The Conclusion continues with the statement that "Alternative B would have beneficial impacts on the C&O Canal National Historical Park as a result of drainage improvements, but could have adverse impacts on the C&O Canal National Historical Park during the construction phase." Yet, the destruction of mature forest to build a construction road just isn't "temporary detectable adverse impacts."</p>	<p>The construction route would be re-vegetated as part of the project. Therefore, the impact is considered temporary. In addition, construction routes would be selected in order to avoid impacts on vegetation and steep topography to the extent possible. Carrying equipment and materials in by hand will be the preferred method, and any mechanical equipment will be limited to small duty equipment (i.e., Gator utility vehicle or bobcat). Efforts will be made to limit the disturbance by mechanical equipment. Where mechanical equipment is needed, the route will be covered in mulch to protect the soils, and the alignment of these routes will avoid large trees or sensitive resources. At the Southwest Channel, it is anticipated that mechanical equipment will be based along MacArthur Boulevard, with fill materials pumped to the channel.</p>
	<p>The proposed drainage improvements would alter "potential historical resources" is not true. The erosion and sediment deposition process in this area just uphill of MacArthur Boulevard damaged the bottom of the staircase and engulfed it in vines. Therefore, the limits of disturbance of the restoration work should include the bottom of the staircase.</p>	<p>Limits of disturbance, which represent the area that would be disturbed as part of the action alternative, are not the same as the project site, which is the general study area. The limits of disturbance do not include the trolley bed and concrete stairs.</p>
	<p>The EA states that "Dam 1 - Little Falls is largely ruined with little remaining, and therefore does not qualify as a structure." (EA, page 17) Perhaps the dam was not a "contributing structure" to a historic designation, but it serves very real purposes.</p>	<p>The EA does not refer to the purpose of Dam 1, but rather that it has been documented that Dam 1 specifically does not contribute to the historic significance of the C&O Canal NHP.</p>
Archeology	<p>The description of cumulative impacts does not describe impacts on archeological resources.</p>	<p>The EA describes cumulative impacts on the structure of the C&O Canal, an archeological resource.</p>

Topic	Concern Statement	Response
Water Resources	Stormwater discharges to the Southwest Channel have not been reduced as of spring 2019, let alone eliminated.	The changes to the ICC-B site, performed in accordance to federal and state regulations, had reduced the stormwater discharges in the Southwest Channel at the time of the EA release.
Water Resources	The EA does not adequately address Riverine Wetland FA/FB and Palustrine Wetland D is not relevant to damaged area.	See Errata. The EA documents the wetlands within the project area; the EA states on Page 27 "No activities would occur within Palustrine Wetlands D and E."
	The EA documents do not establish that "toxicants" were carried downstream by "Riverine Wetlands AA/AB and BA/BB" and "deposited in C&O Canal during flooding events."	Toxicants referenced include runoff from driveways and parking lots; as stated on Page 25 of the EA, "For details, see Appendix B."
	Sediment depths are not effectively considered in alternatives analysis or in Functions and Values Assessments	The EA and the Functions and Values Assessment identify the uplift as a result of sedimentation removal on Page 27 and Page 7, respectively.
	Construction work was not the primary source of the sediment in the Wapakoneta "Riverine Wetland" (more appropriately, the C&O Canal) caused by the ICC-B site's stormwater.	The document does not claim that construction work is the primary source of sediment in the Wapakoneta Riverine Wetland. The Functions and Values Assessment states on Page 7 that "Suspected potential sources of excess sediment or toxicants, such as constructions sites, roadways, industrial activities, and/or other developments in the watershed above the wetland may increase the importance of this function."
	The EA inaccurately refers "ephemeral stream north of the site," including the figures.	See Errata. Figures did not address the type of stream channel.

Topic	Concern Statement	Response
	The Midsite stream originates in a spring that is located underneath fill on the ICC-B site, and its flows are greatly augmented by periodic releases of stormwater. The spring is what makes this a “stream,” but the spring is not mentioned.	See Errata.
	As a result of improvements in stormwater management on the ICC-B site, water quality in the Wapakoneta Channel has improved, rather than “declined,” turbidity has decreased, and “flashy, erosive flows” have been reduced.	See Errata.
	The description of Wetland CA/CB as a “Low-gradient, excavated, perennial canal adjacent to towpath and upland forest” is inaccurate.	The description of Wetland CA/CB, which is effectively the C&O Canal, is correct. Wetland CA/CB was mislabeled on Table 2 of the Wetland Delineation Report. See Errata.
	The treatment of the stream channels in the figures are inconsistent, and in one case, inaccurate.	See Errata.
	Culvert 9 does not run from “under the Clara Barton Parkway to the C&O Canal.”	See Errata.
Wetlands Delineation Report	This report also largely excludes the Southwest Channel, apparently because this channel is not a “Riverine Waterway.”	The Southwest Channel was not included in the Wetlands Delineation Report because it did not meet the criteria of a wetland.
	Photo 2 is incorrectly labeled.	The label is correct.
	The lengths and areas of the Wetland CA/CB and differ in the Wetlands Functions and Values Assessment and the Wetlands and Waters Delineation Report.	See Errata for Wetlands Delineation Report.
	The EA incorrectly identifies four water features, including the bifurcation of the Wapakoneta Channel into two waterways. The Wapakoneta stream is not a tributary of the C&O Canal.	The Wetlands and Waters Delineation and the EA consider the water features separately because, under current conditions, one section discharges into the C&O Canal and the other into the Potomac River.

Topic	Concern Statement	Response
	Table 2 of the Wetlands Delineation and Table 1 of the Functions and Values Assessment contain conflicting area and length of wetlands.	See Errata.
Functions and Values Assessment	Earlier mentions of fish in the Canal did not mention minnows. This inconsistency should be corrected.	Minnows were included on Page 5, Table 1: Functions and Values of Water Features within Study Area, Summary of Feature ID CA/CB.
	The “footbridge [over the Wapakoneta stream] and path” referenced is located between Wapakoneta Road and the county park, with the Waldorf School east of the county park.	See Errata.
	Why didn’t NPS talk about the recreational and historical value of removing “invasive plants” from the trolley line right-of-way and from the base of the historic staircase?	The removal of invasive plants in the limits of disturbance will not notably improve the recreational value of the park.
	The project would provide uplift to the aesthetic and visual quality of the site.	The impacts associated with the stormwater improvements for Visual Quality and Aesthetics would be similar to existing conditions, creating a vegetated area.
	Although another part of the “Functions and Values Assessment” the document states that the Wapakoneta stream will not contribute significantly to “groundwater recharge,” the table states that it does and will.	See Errata.
	The statement in the Table 5 that there would be “no uplift” from sediment removal and Sediment/Shoreline Stabilization contradicts the Functions and Values Assessment	Table 5 of the EA identifies potential uplift for Wetland CA/CB, consistent with the Functions and Values Assessment.

APPENDIX D: SECTION 106 COORDINATION LETTERS



United States Department of the Interior

NATIONAL PARK SERVICE
700 George Washington Memorial Parkway
McLean, Virginia 22101

IN REPLY REFER TO
1 A 2 (GWMP-ICC-B)

JAN 26 2018

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, Maryland 21032-2023

Attn: Natalie Loukianoff and Beth Cole

Dear Ms. Hughes,

The National Park Service (NPS), in collaboration with the Office of the Director of National Intelligence (ODNI) is proposing an undertaking for the restoration of park land adjacent to the ODNI Intelligence Community Campus-Bethesda (ICC-B) in Montgomery County, Maryland. The NPS, as the lead federal agency, is formally initiating consultation for this project with the Maryland State Historic Preservation Officer (SHPO), in accordance with 36 CFR 800.3 of Section 106 of the National Historic Preservation Act.

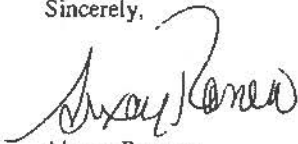
The project area is located on NPS land adjacent to the west of the ICC-B campus, between the ICC-B campus and the Potomac River. Two NPS units, the George Washington Memorial Parkway and the Chesapeake & Ohio (C&O) Canal National Historical Park administer the affected land in Bethesda, MD. The project involves restoring two eroded natural stream channels and one erosion channel that are downstream of the ICC-B and resolving sedimentation load issues at the C&O Canal. Both the George Washington Memorial Parkway and the C&O Canal National Historical Park Historic District are listed in the National Register of Historic Places and the Maryland Inventory of Historic Places.

The NPS is developing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA). The NPS will also develop a Section 106 Assessment of Effect (AOE) for this project as a separate, but parallel, process to the EA. The proposed Area of Potential Effect is the project site and surrounding park land, as shown in the attached map. We are planning to consult with the public per 36 CFR 800.3(e) in public meetings and through our Planning, Environment, and Public Comment website (www.parkplanning.nps.gov). We anticipate these outreach efforts will accommodate the requirements of both NEPA and the Section 106 processes.

A copy of the EA and the AOE will be provided to your office for review when it becomes available, and we anticipate further consultation with your office as mandated by Section 106.

We look forward to working with you on this project. If you have any questions, please do not hesitate to contact Matthew Virta at 703-289-2512 or via email (matthew_virta@nps.gov).

Sincerely,



Alexcy Romero
Superintendent, George Washington Memorial Parkway

Enclosure: Proposed Area of Potential Effect

cc:

Simone Montelcone – NPS-GWMP
Matthew Virta – NPS-GWMP
Brent Steury – NPS-GWMP
Brenda Wasler – NPS-GWMP
Andrew Landsman – NPS-CHOH
Kimberly Benson – NPS-NCR

Area of Potential Effect



LEGEND

- | | |
|--------------------------------------|--------------------------------------------------------------------|
| Project Site | Chesapeake & Ohio Canal National Historical Park Historic District |
| Draft Area of Potential Effect (APE) | Clara Barton Parkway |

MARYLAND DEPARTMENT OF



PLANNING

MARYLAND HISTORICAL TRUST

Larry Hogan, Governor

Boyd Rutherford, Lt. Governor

Robert S. McCord, Acting Secretary

February 26, 2018

Alexey Romero, Superintendent
George Washington Memorial Parkway
National Park Service
700 George Washington Memorial Parkway
McLean, Virginia 22101

Re: Restoration of Park Land Adjacent to the ODNI Intelligence Community Campus- Bethesda
George Washington Memorial Parkway, Montgomery County, Maryland

Dear Superintendent Romero:

Thank you for initiating consultation with the Maryland Historical Trust (Trust) regarding the proposed restoration of park land adjacent to the ODNI Intelligence Community Campus- Bethesda (ICC-B) in Montgomery County. The Trust, Maryland's State Historic Preservation Office (SHPO), is reviewing the submitted information to assess the project's effects on historic properties, pursuant to Section 106 of the National Historic Preservation Act. We offer the following comments and look forward to further consultation to successfully complete the project's historic preservation review.

In addition to the project site being located within National Park Service Land, the project site is immediately adjacent to the Army Map Service Historic District (Maryland Inventory of Historic Properties Nos. M: 35-133 and M: 35-134). We look forward to receiving the Environmental Assessment (EA) and Section 106 Assessment of Effect (AOE) for this undertaking.

The Trust looks forward to further consultation to successfully complete the project's historic preservation review. If you have questions or require further assistance, please contact Natalie Loukianoff at natalie.loukianoff@maryland.gov or Beth Cole at beth.cole@maryland.gov. Thank you for providing us this opportunity to comment.

Sincerely,

Natalie Loukianoff
Preservation Officer, Project Review and Compliance

EJC/NSL 201800479

CC: Andrew Landsman (NPS-CHOH)
Kimberly Benson (NPS-NCR)

Maryland Historical Trust • 100 Community Place • Crownsville • Maryland • 21032

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United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
McLean, Virginia 22101

MAY 24 2019

IN REPLY REFER TO:
1 A 2 (GWMP-ICC-B)

Ms. Elizabeth Hughes
State Historic Preservation Officer
Maryland Historical Trust
100 Community Place, 3rd Floor
Crownsville, Maryland 21032-2023

Attn: Natalie Loukianoff and Beth Cole

Dear Ms. Hughes:

The National Park Service (NPS), in collaboration with the Office of the Director of National Intelligence (ODNI) is proposing an undertaking for the restoration of park land adjacent to the ODNI Intelligence Community Campus-Bethesda (ICC-B) in Montgomery County, Maryland. To this end, the NPS, as the lead federal agency, has prepared an Environmental Assessment (EA) and Assessment of Effects (AOE) to analyze the potential impacts of two alternatives for the proposed George Washington Memorial Parkway (GWMP) Parkland Restoration Plan (Plan), including a no-action alternative.

The project area is located on NPS land adjacent to the west of the ICC-B campus, between the ICC-B campus and the Potomac River. Two NPS units, the GWMP and the Chesapeake & Ohio (C&O) Canal National Historical Park administer the affected land in Bethesda, MD. The project involves restoring two eroded natural stream channels and one erosion channel that are downstream of the ICC-B and resolving sedimentation load issues at the C&O Canal.

The purpose of the Plan is to improve the long-term ecological function and drainage of two stream channels, stabilize a non-natural erosion channel, and resolve sedimentation issues on NPS land that is downstream of the adjacent ICC-B campus.

In accordance with the requirements of Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (51 U.S.C. 306108), and the Advisory Council on Historic Preservation's implementing regulations (36 CFR 800), the NPS has considered the effects of this undertaking to historic properties. The GWMP initiated Section 106 consultation with the Maryland Historical Trust in a letter dated January 26, 2018 and provided a proposed Area of Potential Effects (APE). A response was received on February 26, 2018 acknowledging receipt of the project materials and offering comments on the proposed undertaking. The project's APE encompasses the GWMP, including the Clara Barton Parkway, and the C&O National Historical Park, which are listed in the National Register of Historic Places (NRHP). The APE also includes the Washington Aqueduct, a National Historic Landmark, and the Army Map Service Historic District, listed in the NRHP.

As part of the continuing consultation process and in accordance with 36 CFR 800.11, please find enclosed for your review and concurrence a hard copy of the AOE report for the proposed undertaking (an electronic version has been sent separately). NPS has concluded that implementation of the Plan, if the project is implemented in a way that meets the Secretary of the Interior's Standards for the Treatment of Historic Properties, will result in no adverse effect to historic properties. NPS will continue to consult and work closely with the Maryland State Historic Preservation Office during implementation for the restoration projects. NPS therefore has determined that the adoption of the Plan (Alternative B) will have no adverse effect on historic properties. In order to further avoid or minimize adverse effects on historic properties, NPS would undertake the following steps during implementation of the Plan:

- Maintain the woodland character of the GWMP Historic District during construction by avoiding damage to large trees and minimizing disturbance of native vegetation.
- Protect known historic resources to the extent practicable.
- Minimize ground-disturbing activities to the extent practicable during the construction phase, including using existing roadways and construction methods that minimize disturbance.
- Consult with Maryland Historical Trust to develop strategies to ensure historic features of the C&O Canal National Historical Park are not damaged during construction.
- Conduct a Phase IB archeological survey based on the current design, limits of disturbance, and potential for unknown archeological resources. The survey would include a systematic pedestrian survey, mapping, and both systematic and focused shovel testing within areas of less than 15 percent slope and within proposed construction access and staging areas rather than along the stream channels themselves, which are steeply sloped and previously disturbed.

The Plan and EA are being released to the public for a 30-day review period from May 23 to June 23, 2019. Per 36 CFR 800.3(e), the EA and Plan will be available to the public through our Planning, Environment, and Public Comment website (www.parkplanning.nps.gov). Following the review period and analysis of public comments, a decision document will be released.

NPS seeks your concurrence with our effects determination as summarized above and detailed in the enclosed AOE. We appreciate your involvement in this project and look forward to working with you as the project proceeds. Should you have any questions regarding this correspondence, please contact Matthew Virta, GWMP Cultural Resources Program Manager, at 703-289-2512 or via email at matthew_virta@nps.gov.

Sincerely,



Charles Cuvelier
Superintendent, George Washington Memorial Parkway

Enclosure: Assessment of Effects Report

MHT Log #

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FOR USE BY MARYLAND STATE HISTORIC PRESERVATION OFFICE

The ICC-B Stream and Parkland Restoration Plan undertaking will have no adverse effect on the National Register qualities of the George Washington Memorial Parkway, C&O Canal National Historical Park, Washington Aqueduct, the Army Map Service Historic District, or other historic properties, nor is it likely to impact any unknown cultural resources. The present correspondence satisfies NPS federal agency responsibilities under Section 106 of the NHPA.

(*) Conditioned on NPS fulfillment of measures specified in its letter of 5/25/19

Beth Cole
I Conclir (Signature)

6/28/2019
Date

Beth Cole
Printed Name

Administrator, Project
Title
Review & Compliance

cc: David Gadsby - NPS-GWMP
Matthew Virta - NPS-GWMP
Robert Mocko - NPS-GWMP
Andrew Landsman - NPS-CHOH
Joel Gorder-NPS-NCR
Kimberly Benson - NPS-NCR

APPENDIX E: ERRATA

The following changes have been made to the *George Washington Memorial Parkway Parkland Restoration Plan Environmental Assessment* (May 2019) Finding of No Significant Impact (FONSI) to correct minor statements of fact and update information. The original text is shown below in strikethrough, followed by the replacement text in underline.

Environmental Assessment

Project Background

Page 5, Project Background, line four:

“Drainage Areas A and B discharge to the ~~ephemeral...~~ stream north of the site,”

Page 5, Project Background, line 16:

anticipated in ~~2019~~ 2020.

Planning Issues and Concerns Retained for Further Analysis

Page 6, Second Paragraph, Line Six:

Additionally, page 5-12 of the ICC-B EA indicates that in 2011, water quality ~~has had~~ declined in the Wapakoneta Channel, stating that the “current stormwater collection and outfall into a highly eroded ephemeral erosive flows and increased turbidity in any water that could be present in the channel.” Since then stormwater improvements at the ICC-B have reduced stormwater outfall leading to the Wapakoneta Channel.

Planning Issues and Concerns Dismissed from Further Analysis

Page 7, Potential for the project to impact water resources, Line 7:

The overall quality of water entering the channels and the C&O Canal would remain the same under the proposed action with the exception of a reduction in sediment. The NPS would comply with applicable federal and state requirements, including the Energy Independence Security Act and Maryland Department of the Environment stormwater management regulations. Therefore, this topic was dismissed from further analysis.

New Language added

Bottom of page 13, after Figure 8:

Construction Access

Construction routes would be selected in order to avoid impacts on vegetation and steep topography to the extent possible. Carrying equipment and materials in by hand will be the preferred method, and any mechanical equipment will be limited to small duty equipment (i.e., Gator utility vehicle or bobcat). Efforts will be made to limit the disturbance by mechanical equipment. Where mechanical equipment is needed, the route will be covered in mulch to protect the soils, and the alignment of these routes will avoid large trees or sensitive resources. At the Southwest Channel, it is anticipated that mechanical equipment will be based along MacArthur Boulevard, with fill materials pumped to the channel.

Historic Buildings and Structures

Page 17, first bullet item, lines 2-4:

A box culvert (Culvert 9) runs under the Clara Barton Parkway toward the C&O Canal to pass the intermittent stream, just east of the Little Falls Pumping Station.

Wetlands

Page 24, Water Feature Investigation Results, fourth paragraph, lines 1-3:

Riverine Wetland BA/BB (Midsite Channel) originates just off-site and flows through at stormwater outfalls on ICC-B property, and flows southwest where it enters a four-foot diameter culvert and continues to flow under MacArthur Boulevard.

Page 27, Impacts of Alternative B- Action Alternative, Second Paragraph, last line:
No changes to Functions and Values would occur within Riverine FA/FB wetlands.



LEGEND

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| Project Area | Stream channels |
| National Park Service parkland | Non-natural erosion channel |

Project Area
Page 15, Figure 9:



LEGEND

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|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| Project Site | Clara Barton Parkway | Washington Aqueduct |
| Area of Potential Effect (APE) | Chesapeake & Ohio Canal National Historical Park Historic District | Army Map Service Historic District |

Appendix A: Wetland Delineation Report

Page 4, Water Feature Delineation Results, third paragraph:

Two unnamed perennial streams were delineated within the study area and are identified as Riverine Wetland AA/AB and BA/BB. ~~These riverine wetlands are~~ Wetland AA/AB is a relatively permanent non-navigable tributary of the Potomac River; under current conditions, portions drain into the C&O Canal. Wetland BA/BB is a relatively permanent non-navigable tributaries of the C&O Canal.

Page 6, Table 2, Riverine Wetland CA/CB Area (SF): ~~481~~ 78,382

Page 6, Table 2, Riverine Wetland FA/FB Linear Feet: ~~83~~ 1,552

Page 6, Table 2, Riverine Wetland FA/FB Area (SF): ~~78,382~~ 481

Page 6, Table 2, Riverine Wetland FA/FB Linear Feet: ~~1,552~~ 83

Appendix B: Functions and Values Assessment

Page 5, Table 1, Line CA/CB, Area (Square Feet): ~~4,150~~ 78,382

Page 5, Table 1, Line CA/CB, Linear Distance (Length): ~~83~~ 1,552

Page 5, Table 1, Lines AA/AB and CA/CB, Functions and Values: ~~Groundwater recharge/discharge;~~

Page 6, Floodflow Alteration, Existing Conditions, Second paragraph, lines 6-8:

This is a principal function of the C&O Canal collects stormwaters and/or floodwaters from multiple receiving waters including Riverine Wetlands ~~AA/AB and BA/BB~~, that are attenuated by the lock system before entering downstream waterway (Potomac River).

Page 10, Educational/Scientific Value, Evaluation of Uplift with Proposed Parkland Restoration, lines 2-4:

The site-wide removal of invasive plants may provide minimal uplift to Educational/Scientific Value in and around Riverine Wetland AA/AB, especially in the area of the footbridge and path between Wapakoneta Road and Montgomery County's Sangamore Local Park, near the Washington Waldorf School.