



FINDING OF NO SIGNIFICANT IMPACT

BUZZARD POINT PARK IMPROVEMENTS

Washington, DC

The National Park Service (NPS) prepared an Environmental Assessment (EA) to evaluate proposed improvements to Buzzard Point Park (the Park) in the Buzzard Point Neighborhood in Southwest DC. The Buzzard Point neighborhood is rapidly transitioning from an industrialized area consisting of large utility buildings, to mixed use residential and commercial developments, set at the confluence of the Anacostia and Potomac Rivers. The Park is comprised of a collection of parcels administered by the NPS collectively totaling 7.75 acres, of which only 3.33 acres are on land; the remainder of the site includes parcels that lie within the Anacostia River. The Park includes approximately 1,500 linear feet of shoreline along the Anacostia River. Currently, the Anacostia Riverwalk Trail (ART) ends abruptly on both ends of the Park.

The purpose for taking action is to transform the Park into an accessible waterfront amenity that continues the Anacostia Riverwalk Trail. The Park would provide residents and visitors with more open space, recreational opportunities, and ways to connect with the Anacostia River while enhancing visitor experience of Buzzard Point Park. Furthermore, by continuing the ART through the Park, the NPS can enhance the experience for the trail user.

The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended, (42 United States Code [USC] § 4321 et seq.); the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508); NPS Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making (DO #12); the NPS NEPA Handbook (NPS 2015); and DO #28 Cultural Resource Management.

SELECTED ALTERNATIVE

Based on the analysis presented in the EA, the NPS selected Alternative B, Option 1 as described on page 13 of the EA. This action includes clearing the Park of existing overgrown vegetation and remnant concrete or asphalt pads. The existing shoreline treatments would be completely removed and replaced with an eight-foot high concrete seawall, and reinforced with steel piles. Stone revetment would be placed in the river along the length of the seawall, which would act to reinforce the seawall and protect the seawall from erosion and storm surges while improving the visual appearance of the shoreline. There would be scenic overlook trail/plaza areas in the northern and southern extents of the Park, and a terraced viewing area in the center, leading to an area of cut stone that would allow visitors closer access to the water's edge. Infrastructure in the southern portion of the Park, specifically the former marina office building, restroom facility, and remnant concrete boating ramp, would be demolished and removed from the site. Much of the Park would be regraded and replanted.

The ART would be extended through the Park as a multi-use trail of varying widths (between 10-16 feet) to allow for access to recreational features along the trail without inhibiting circulation. The multi-use trail would be higher in elevation than the passive walking trail and would continue through the central portion of the Park. The trail would then tie into the terminus of the existing ART. Recreational opportunities in the Park would include walking, running, or cycling along the ART, a play area for children, level and mounded (elevated) lawns for observation of the river and Capitol Building (looking north along V Street, SW), a dock for users who wish to access the Park from the river, and the Mathew Henson Center (MHC). The MHC would be expanded to accommodate restrooms with a separate exterior

access. The boat dock behind the MHC would be rebuilt to include exterior access from a separate walkway and pier from the passive (walking) trail.

RATIONALE FOR DECISION

The NPS selected Alternative B, Option 1 for implementation because this alternative would transform the Park into an accessible community waterfront amenity and offer recreational opportunities amidst a rapidly transforming and urbanized community. This Alternative would continue the ART and enhance the experience for trail users. The overlooks, which would be located in the northern and southern areas of the Park's shoreline, would offer improved views of the Anacostia River and, therefore, would benefit visitor experience.

The stone revetment would help protect the sea wall during storm events, while providing the opportunity for Park visitors to get close to the water. The added revetment would also improve upon the visual appearance of the shoreline by eliminating an otherwise 8-foot drop-off from the edge of the seawall.

The EA that was prepared for this project, however, identified Alternative B, Option 2 as the NPS' Preferred Alternative. Although Option 2 would result in fewer environmental impacts, the NPS conducted further coordination with the District Department of Energy and Environment (DOEE) regarding opportunities to consider future modifications to Option 1 (with the rip-rap) that may allow for a softer edge as the design process continues. While there would be greater environmental impacts initially, due to construction, revetment in the water may facilitate plantings in the water, or ultimately allow certain wildlife and plant species to become established on the rocky surfaces. Therefore, Alternative B, Option 1 offers the NPS the greatest flexibility to continue to consider design options that may improve conditions for plants and wildlife to thrive at the river's edge.

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 1.

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The Selected Alternative, as documented in the EA, has the potential for temporary and permanent construction-related adverse impacts on wetlands (including submerged aquatic vegetation (SAV)), floodplains, and cultural resources. However, long-term beneficial impacts on visitor use and experience and floodplains will occur.

There is an estimated 29,310 SF of temporary riverine wetland impacts resulting from construction of the seawall, gangway and dock, and overlook trail/plaza areas. In-water impacts would consist of disturbance from removal of existing shoreline treatments and the marina boat ramp, and construction of the new seawall and overlook trail/plaza areas.

There is also an estimated 26,690 SF of combined permanent wetland impacts associated with placement of the stone revetment, and shading beneath overlook trail/plaza areas and beneath the dock behind the MHC. Of the 26,690 SF of permanent wetland impacts, 1,898 SF of permanent wetland impacts occurs within right-of-way owned by the District Department of Transportation (DDOT).

An increase in shading beneath the trail/plaza overlook decks permanently impact wetland plant grown by blocking sunlight, which prohibits establishment of SAV. Impacts to wetlands and SAV also slightly diminish the functions and values of the riverine wetland by removing habitat for freshwater fish, shellfish, and other wildlife.

There will be adverse impacts to the natural functions of the floodplain such as flood storage, flood conveyance, groundwater recharge, and trapping of sediments, due to the increase in impervious surfaces. However, beneficial impacts to other natural functions of the floodplain such as reducing excessive erosion and removing pollutants from waters will occur due to new features including a reinforced seawall and stormwater management. There is an estimated 156,900 SF of temporary floodplain impacts associated with construction. The addition of trails and plaza areas will permanently increase impervious

surfaces in the Park by 70,455 SF within the 100-year floodplain, and 8,590 SF within the 500-year floodplain.

In accordance with Section 106 of the NHPA, the project area was surveyed for historic properties that are listed on or eligible for inclusion on the National Register of Historic Places. This survey assessed all buildings, structures, and infrastructure proposed for removal as part of the selected alternative. The survey also examines the potential for impacts to archeological resources and cultural landscapes. The seawall is considered a contributing feature to Anacostia Park, which is eligible for listing in the National Register of Historic Places. Although this section of seawall has low integrity of association and feeling, it retains moderate to high levels of integrity of location, workmanship, setting, materials, and design. As such, in an effort to avoid an adverse effect, the NPS will work to retain the existing section of the seawall in its current location and integrate it within the selected alternative. However, if it is determined that it is not feasible for the wall to remain in its existing location, the NPS will coordinate with the DC State Historic Preservation Officer to draft a Memorandum of Agreement to mitigate the adverse effects caused by the project.

Overall, there will be long-term benefits to visitor use and experience due to increased public access to the Anacostia Waterfront, increased opportunity for recreation within an urbanized area, enhanced visitor facilities, and improved visitor safety.

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:



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Superintendent
Buzzard Point Park
National Capital Parks-East
Region 1 - National Capital Area

January 16, 2020

Date

Approved:



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

January 31, 2020

Date

Documents appended to the FONSI include:

- Attachment 1: Mitigation Measures;
- Attachment 2: Non-impairment determination;
- Attachment 3: Response to public comments; and
- Attachment 4: Errata
- Attachment 5: Section 106 coordination letters

ATTACHMENT 1: MITIGATION MEASURES

The National Park Service (NPS) places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented as part of the Selected Alternative.

The NPS will establish an appropriate level of monitoring through the design and construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

WETLANDS AND FLOODPLAINS

- The construction of the seawall, dock, and trail/plaza overlook areas are subject to permitting requirements and any associated mitigation measures to be determined at that time. In addition, wetland mitigation will occur at a 10:1 ratio and would involve invasive plant management. Because wetland impacts are expected to exceed 0.1 acres, a more detailed wetland mitigation plan satisfying the requirements in NPS Procedural Manual 77-1 will be developed.
- An approved Erosion and Sediment Control Plan will be prepared prior to construction to minimize the risk of sediment-laden runoff entering adjacent wetlands and waterways.
- In-stream work is restricted from April 15 to October 15, of any year, to avoid impacts to SAV during the growing season.
- In-stream work is restricted from February 15 to June 15, of any year, to avoid disturbance to both the Shortnose and Atlantic sturgeon.
- Proposed infrastructure within the 100- year floodplain will be designed to be resistant to flood flows and velocities.

CULTURAL RESOURCES

- Develop tangible (not electronic) interpretive signage that recounts the development of Anacostia Park and the role the seawall played as a contributing feature of that Park.
- The Anacostia seawall will be repaired and retained in-place to the greatest extent possible.
- Continue consultation with the DC SHPO on Buzzard Point Park design plans as they relate to the Anacostia seawall and regarding the proposed addition to the Matthew Henson Center (MHC).

ATTACHMENT 2: 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).

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

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

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).

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 wetlands and floodplains (including submerged aquatic vegetation, or SAV), and cultural resources. 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.

WETLANDS AND FLOODPLAINS

The Selected Alternative will affect wetlands, floodplains, and SAV. Construction of the Selected Alternative will result in an estimated 29,310 square feet (SF) of temporary impacts to the riverine wetland. There will also be an estimated 26,690 SF of permanent impacts from placement of revetment within the riverine wetland, from shading beneath trail/plaza overlook areas, and from shading beneath the gangway and dock. Of the 26,690 SF of permanent wetland impacts, 1,898 SF are located within DDOT right-of-way.

Due to wetland impacts and impacts to SAV, the functions and values of habitat for freshwater fish, shellfish, and other wildlife will be affected. However, all in-stream work will be restricted from April 15 to October 15, of any year to avoid permanent impacts to SAV during the growing season, and from February 15 to June 15, of any year, to avoid disturbance to shortnose and Atlantic sturgeon.

The NPS will also adhere to an Erosion and Sediment Control Plan (to be developed prior to construction), to minimize the risk of sedimentation to wetlands and the waterway. The NPS will also mitigate wetland impacts at a 10:1 ratio; wetland mitigation would involve invasive plant management.

When considering the relative magnitude of the Anacostia River shoreline and area of SAV mapped to the south and west of the project area, as well as the planned mitigation measures, there is an expected negligible direct and indirect impact to riverine wetlands.

The Park is almost entirely within the 100-year floodplain, with the exception of the northwestern most portion being in the 500-year floodplain. Construction of the Selected Alternative will require the Park to be regraded and redesigned to include a mixture of pervious and impervious surfaces, resulting in 156,900 SF of temporary impacts within the 100-year floodplain. There will also be an estimated 70,455 SF of permanent impacts within the 100-year floodplain, and 8,590 SF of permanent impacts within the 500-year floodplain. When considering the relative magnitude of the Anacostia River floodplain, the Selected Alternative would have negligible direct and indirect impacts to the functions of the floodplain from flood risks. The impacts on wetlands, floodplains, and SAV will not alter the purpose and significance of the Park.

CULTURAL RESOURCES

The District of Columbia Historic Preservation Office (DC SHPO) requested that a Phase 1A Archeological Sensitivity Assessment be conducted for the Park in 2018. A Phase 1A archeological investigation was completed in October 2018. The investigation found that archeological sensitivity in the project area is considered to be low to non-existent. In coordination with the DC SHPO, the NPS determined that no further archeological investigation was warranted.

There are four historic properties (or structures) associated with this project. The project area is located near the Fort McNair Historic District. The project area also contains a PEPCO-owned water intake plant that once operated as part of the Buzzard Point Power Plant, but that now operates as the Matthew Henson Center. Additionally, there are remnants of the Anacostia Seawall along roughly 130 feet of coastline within the project area; the seawall is considered a contributing feature to Anacostia Park, which is eligible for listing in the National Register of Historic Places. The project area contains a Mission 66 Comfort Station that dates to the Parkscape USA era. The NPS identified these properties in an Assessment of Effects (AoE) document. The NPS consulted with the DC SHPO on potential impacts to these properties in June 2019. The NPS determined No Adverse Effects would occur to any historic property. The DC SHPO subsequently requested additional information on the Anacostia seawall within the project area, and, as such, the NPS submitted a revised AoE to the DC SHPO in August 2019. Based on the revised AoE, the DC SHPO concurred there would be No Adverse Effect on either the Fort McNair Historic District or the water intake plant (the MHC). However, the DC SHPO determined that the project is *likely* to result in an Adverse Effect on the Anacostia Park seawall. In an effort to avoid an adverse effect, the NPS will work to retain the existing section of the seawall in its current location and integrate it within the selected alternative. However, if it is determined that it is not feasible for the wall to remain in its existing location, the NPS will coordinate with the DC SHPO and draft a Memorandum of Agreement to mitigate the adverse effects caused by the project. The NPS consulted with DC SHPO in October and November 2019 regarding newly discovered information about the comfort station. Based on criteria established in the Nationwide Mission 66 Multiple Properties nomination, the NPS determined that the Buzzard Point comfort station is not eligible for listing on the National Register. The DC SHPO concurred with this assessment. As such, no impairment to historic properties or structures will occur.

CONCLUSION

NPS has determined that the implementation of the Selected Alternative will not constitute an impairment of the resources or values of the Buzzard Point Park. As described above, anticipated impacts as a result of the Selected Alternative are not anticipated to harm resources or values critical 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 3: PUBLIC COMMENT SUMMARY AND RESPONSES

No.	Comment	Response
1	One commenter expressed support for the Selected Alternative, Option 1, as they believe rip-rap to be a sustainable technique to stabilize the shoreline while a fence (the railing included in Option 2) will only act as a barrier.	While the EA identified Alternative B, Option 2 as the preferred alternative, we have reconsidered our approach based on input from the public and our agency partners. Therefore, the Finding of No Significant Impact (FONSI) reflects our current thinking on design options for the Park, and identifies Alternative B, Option 1 as the selected alternative. We have also determined that the shoreline treatment of Option 1, which includes rip-rap (revetment) placed in the water, may continue to be slightly modified as we proceed from concept to final design. Because the Environmental Assessment (EA) already evaluates the most adverse potential environmental impacts associated with both design options, any shoreline improvements we consider as we move forward through final design, such as creating a softer edge, are likely to result in fewer adverse environmental impacts compared to the selected alternative. However, we will continue to consult with the District Department of Energy and Environment (DOEE) on any such shoreline improvements and the environmental impacts as the project proceeds.
2	One commenter expressed support for Alternative B, Option 2, as they support the trails and overlooks associated with that option, and they expressed concern over the stone revetment in Option 1 collecting trash.	Moving forward, the NPS will develop a plan for the park to address maintenance related to trails, overlooks, and in-water features such as the rip-rap, to ensure views of the Anacostia River are not obstructed or degraded.
3	Two commenters expressed support of the no build option as it would result in the fewest environmental impacts.	While the NPS did evaluate the No Action Alternative (Alternative A) in the EA, we feel it would not meet the purpose and need of the project and would not serve the people who visit, work at, or reside in the Buzzard Point peninsula.
4	Some commenters expressed that the EA should be re-assessed. One commenter stated that environmental assessments (EA) need a minimum of two design options in addition to the no build option and questioned that this EA only presented one design with a slight modification.	NEPA does not require the NPS or any Federal agency to consider "all" alternatives, only those alternatives that are considered to be "reasonable" in accordance with 40 CFR §1500.2(e). NEPA does not specify a number of alternatives that must be evaluated.
5	Commenters expressed support of the Anacostia Riverwalk Trail (ART) being continued through the Park.	Extending the ART through the Park will achieve another of our primary objectives for Buzzard Point Park. The concept designs illustrated in the EA evaluated two separate trails (a multi-

One commenter expressed support for the walking trail as a multi-use trail.

purpose and a walking trail) in order to serve pedestrians as well as cyclists, runners, and others that would use the ART. Both designs evaluated in the EA have the trails converging in the northern and southern areas of the Park. Moving forward, we will continue to evaluate what makes the most sense for Buzzard Point Park. The final design may have slight modifications compared to these conceptual designs, however, the NPS will continue to keep the public notified of the project progress and design updates.

- 6 Commenters expressed strong support of the development of the Matthew Henson Center (MHC). The selected alternative, Alternative B, Option 1, includes improvements to the MHC such as creating restroom facilities with exterior access, and reconstructing the boat dock that is behind the MHC currently to have exterior (public) access. Any other improvements would be subject to leasing conditions between the NPS, PEPCO, and the Earth Conservation Corps, and as such, are not a part of this action.

One commenter indicated support of the Earth Conservation Corps being the right partner for the MHC.

One commenter stated that water taxi access as well as kayak and canoe access should be included in docks at the MHC. The commenter noted that the water taxi options should be focused on residents in Buzzard Point rather than bringing outsiders to venues.

The improved dock at the MHC would be available as a public amenity for boaters and pedestrians. DDOT is working with a variety of stakeholders to develop a coordinated water taxi system. Their plans include investigating appropriate stops along the Buzzard Point peninsula.

One commenter expressed concern over the MHC being too close to the Anacostia River edge. The commenter requested that the building owner stabilize and restore the bank with natural features.

With respect to the MHC's proximity to the shoreline, any issues related to shoreline stabilization will be resolved through the design process.

- 7 One commenter asked the NPS to ensure there is adequate emergency access for first responders through the Park, particularly water access, in case there are emergencies during times when the stadium is in use and other access points to the southern part of the peninsula are potentially obstructed. The commenter recommended the DC Harbor Patrol review site plans.

Page 31 of the EA addresses emergency access through the park for first responders accessing the ART from First Street, SW. However, water access was not considered; although, given that there are restrictions for street parking and blocking entryway to Fort McNair, 2nd Street, SW would be a viable emergency access route to the end of the Buzzard Point Peninsula. Other such access routes may include the James Point Marina if water access is required.

However, the NPS will include the DC Harbor Patrol on future correspondence as the design advances for Buzzard Point Park.

- 8 One commenter expressed concern over development within the 500-year floodplain and requested all trail structures be fortified to withstand flooding, citing the DC Resiliency Plan.

The Park design will remain in compliance with all applicable federal and District of Columbia floodplains and stormwater management specifications.

- 9 One commenter expressed concern over the Park remaining a public use space because the surrounding development includes private residential buildings. The commenter suggested including robust connections from each end of the Park with a focus on serving pedestrians and bicyclists, and screening and soft barriers in the final design to demarcate public and private spaces.
- Public access for all visitors a primary objective for Buzzard Point Park. The current conceptual design plans incorporate multiple public access points from the ART in the northern and southern ends of the Park, and also from First Street, SW, V Street, SW and Half Street, SW.
- It should be noted that two of the three adjacent developments only have access to the Park through the ART, sidewalks, and public right-of-way. These developments do not otherwise have direct access. The Riverpoint development is still in the design process, and based on our current review of design plans, Riverpoint would only have access to the Park via the ART.
- Another commenter stated that every opportunity should be taken to screen the park from the adjacent buildings.
- As the Park design advances past conceptual design, we will continue to look at a variety of strategies to enable the general public to identify Buzzard Point Park as a National Park.
- 10 One commenter suggested including the James Creek Marina in the EA planning process, because they believe many of the same users of the James Creek Marina would also use Buzzard Point Park and that it could be a destination for water taxis.
- James Creek Marina is a separate land parcel, and operates separately from Buzzard Point Park. As such, James Creek Marina was not considered part of the proposal to transform Buzzard Point Park.
- Additionally, the James Creek Marina operates under a separate, presently active, concessionaire agreement, which achieves separate goals from Buzzard Point Park.
- 11 Multiple commenters expressed concern over impacts to submerged aquatic vegetation (SAV) and native freshwater mussels, and suggested elevating the importance in the overall design to prioritize reducing impacts to SAV and mussels.
- While we have no data on the presence or abundance of mussels at this location of the Buzzard Point peninsula, no records for threatened or endangered mussel species were identified by USFWS in the project area. Additionally, most permanent impacts to SAV would be avoided due to seasonal restrictions on when construction can occur. However, we recognize there would be adverse impacts to SAV, and, as such, the NPS is committed to working with DOEE to mitigate these impacts. More specific mitigation would occur as the project proceeds through final design.
- One commenter further suggested possible mitigations for wetlands include compensatory mitigation, observation access, and educational signage.
- In addition, as we discussed in our response to comment #1, Alternative B, Option 1 represents the most substantial adverse impacts associated with the current Park design. As we move forward through final design, the NPS will continue to work with DOEE to consider a softer edge, which might improve long-term conditions for SAV growth at this location of the Anacostia River.
- One commenter disagreed that on page 10 of the EA, "reconstruction of the Park's armored shoreline" could positively affect the adjacent established and future SAV beds.
- Wetland impacts would be mitigated at a 10:1 ratio, as identified in the Finding of No Significant
- One commenter requested that shading impacts should be eliminated wherever possible and mitigated heavily where absolutely necessary.

Impact (FONSI) and as discussed on page 26 of the EA.

With respect to the content on page 10 of the EA, the sentence actually reads, "The proposed project would include reconstruction of the Park's armored shoreline, which could positively or adversely affect the adjacent established and future SAV beds." Note that adverse impacts are also discussed. In addition, mitigation options that the NPS will coordinate with DOEE would have an overall benefit to SAV in the area. Finally, as the project proceeds through final design the NPS will work with DOEE to consider a softer shoreline, which would also have a beneficial impact on SAV.

With respect to the suggestion that shading impacts be eliminated, the NPS must balance its goals and objectives for the Park with the environmental consequences of the action. We believe through mitigation, as well as through the educational access and visual experience the observation areas would offer at Buzzard Point Park, there will be an overall benefit to retaining such features in the final design.

- 12 Commenters asked the NPS to consider a living shoreline to be included as part of the Park design. A softer edge to the park was initially considered as part of the Design Concept Plan (DCP), which was published in 2017. In each of the concepts proposed, the shoreline included a combination of a vegetated and hardened edge consisting of curvilinear graded banks with stepped sills. The NPS considered many factors when determining to advance design concepts that did not involve a softer edge. For example, creating a living shoreline likely involves extending fill material out into the river and placing a substantial breakwater in the river, which would result in greater impacts associated with maintaining the current river edge and protecting it against sea level rise and storm surge.

One commenter questioned why a living shoreline rendering was included in the 2016 stakeholder meeting as well as in the 2016 DC Office of Planning slides then not evaluated in the EA.

Another commenter requested the specific data used to support why living shorelines were not included or considered for the proposed shoreline designs.

A detailed study to determine the feasibility of a living shoreline at Buzzard Point Park was not conducted. We did consider tides and currents data that is available online from the National Oceanic and Atmospheric Administration (NOAA), including buoys and monitors placed at Haines Point and Jones Point, as well as tidal data provided by Reagan National Airport. We further considered DOEE Flood Risk Mapping and Storm Surge data that are also publicly available. Those data anecdotally informed us that even though the river's base flow is not necessarily a concern to living shorelines, storm surge and tidal influence could negatively impact the establishment of a living shoreline. We also have concerns regarding how construction of a breakwater structure would affect sand and sediment migration in the river, or SAV. At this time, we also do not have a good understanding

of how such a structure may affect the hydrology of the river at that location.

As we discussed in our response to comment No. 1, the NPS is committed to working with DOEE to consider options for a softer edge as the project proceeds.

- 13 One commenter requested that the EA go into more detail on avoidance and minimization that were incorporated into the design as stated in the Wetlands and Floodplains SoF. The concept design was developed to minimize impacts to existing wetlands and waters along the shoreline. The seawall and revetment solution was selected in an effort to provide the maximum park space while maintaining the existing shoreline to minimize impacts to waters and marine ecosystems. The elevations for the seawall and walkways in the park were established to provide resiliency for sea level rise and flooding during storm events.
- 14 One commenter requested that NPS coordinates the mitigation plan with National Capital Planning Commission prior to final submission. The National Capital Planning Commission (NCPC) has been a stakeholder in this project since the development of the DCP. The NPS will continue to coordinate with the NCPC as the Park design is advanced.
- 15 One commenter expressed concern over a safety hazard for pedestrians by ending the top stair at the edge of the bike trail. The current conceptual design of the Park includes a passive walking trail that intertwines with the ART multi-use trail to reduce interaction between Park visitors and cyclists passing through the area. In most cases, the multi-use trail is approximately 10 feet wide, however, at the proposed staircase the trail widens to more than 16 feet. The trail width is enlarged at that location to allow for a reasonable landing area at the stairs before pedestrians would cross. Visitor safety is a priority for the NPS, and, therefore, we will continue to consider safety concerns as the design process continues.
- One commenter expressed that 10 feet is too narrow for a trail with regard to the pinch point at Half St SW and V St SW. The concept design illustrates that a 10 foot wide trail can be accommodated at the V Street / Half Street convergence. As the design progresses, the NPS will consider options to provide additional width at that location, possibly through either decking or alteration of the proposed shoreline.
- 16 One commenter expressed concern that there will be no opportunity for casual contact with the Anacostia River. The commenter noted this area could provide an opportunity for putting one's feet in the water or even wading and fishing. We must balance the safety of Park visitors with the slip and trip hazards associated with wet stone (rip-rap) near the river's edge. The NPS considers the dock behind the MHC an opportunity for Park visitors to safely interact with the water.

The commenter suggested that the location of the existing grading of the deteriorating boat ramp east of First Street could be a possible location for

casual river contact.

- 17 One commenter opposed the proposed vertical design element at 1st Street stating it would be inappropriate for another man-made urban element and would waste an opportunity to extend the quality of the historic neighborhood and create a more natural park setting. The commenter suggested that a healthy natural landscape would offset the urbanized surrounding development. The design presented in the EA is conceptual in nature. As the design progresses, we will continue to look for opportunities to incorporate greenspace throughout the Park.
- 18 One commenter expressed concern over having too many programs in a small park, limiting feeling of respite. The concept design was born of ideas from people from the neighborhood during development of the DCP. Our goal was to provide a variety of experiences at the Park. We will continue to consider those comments, as well as the comments offered on the concept design to inform later design phases.
- 19 One commenter stated that the trail surface should be permeable, designed for water storage below, or hard surface to drain to highly absorptive green space. The commenter suggested the use of Sylva Cells and other such features in the design. The current conceptual design does not go into detail regarding stormwater management features or pavement types. Such features will be fully considered as the Park design advances.
- One commenter requested that the material of the ART and the walking path must be no slip for biking.
- 20 One commenter stated that recreation should be incorporated at a scale and design which does not undermine the natural function of riverbank. The commenter expressed that the path should coincide with Half St and V St and not extend beyond the end of Second St. The commenter further expressed that no bicycles should be allowed in the Park, and that the only wheeled vehicles that should be allowed in the Park are wheel chairs and strollers. It is the Park Service's goal to offer the public a space that includes both recreational and educational opportunities, while also preserving the natural features of the environment. As the project proceeds, we will continue to consider the ideas presented by the public while ensuring we maximize the potential of the Park as a public amenity.
- With respect to the ART, restricting bicycle access is in direct conflict with the DC Office of Planning's design guidelines for the trail along Buzzard Point, which are found online at: <https://planning.dc.gov/publication/buzzard-point-vision-framework-and-design-review-guide>
- 21 One commenter requested that all parking be kept as far as possible from the Anacostia River. The NPS considers some parking to be acceptable to allow people with disabilities to have Park access.
- 22 One commenter expressed a safety concern over Half St, SW as it needs to We continue to coordinate plans for Buzzard Point Park with DDOT, however, roadway design

be improved to modern street features are outside of the purview of this project.

- 23 One commenter requested that the BAC Rec Trails Committee
NPS consider a pier along the 1st Street or V Street corridor. The concept design does provide a landing and dock at the MHC. One of the goals for the design was to minimize intrusions into the river. The overlook at the First Street terminus with the river provides for viewing and gathering of park visitors without significant impacts to the river. A pier with direct water access at First or V streets is not part of the NPS program at this time.

ATTACHMENT 4: ERRATA

The following changes have been made to the July 2019 Buzzard Point Park Improvements Environmental Assessment to correct minor statements of fact and update information. Additions to the text are identified by *red, italicized text* and deletions are marked by ~~strikeout~~ unless otherwise noted. These revisions do not change the outcome of the impact analysis, nor do they affect the final decision documented in the FONSI.

Page 1

The Park is currently closed to visitors, with the exception of the Matthew Henson Center (MHC) at the northern extent of the property. *This Potomac Electric Power Company (PEPCO) facility* ~~The MHC is a former Potomac Electric Power Company (PEPCO) facility that~~ is currently being used by the Earth Conservation Corps (ECC) through a three-party agreement with PEPCO and the NPS. A majority of the infrastructure onsite is related to the Park's previous use as a marina and includes a variety of paved, bituminous, and gravel walkways; a concrete retaining wall adjacent to the location of the old dock facilities and concrete boat ramp; a former marina office building; and a restroom facility. Both the office building and restroom facilities are also closed.

Page 7

This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [USC] ~~4332(2)(c))~~; *§ 4321 et seq.*; the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (40 CFR Parts 1500-1508); NPS Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making (DO #12); the NPS NEPA Handbook (NPS 2015); and DO #28 Cultural Resource Management.

Page 8

The Park is currently improved with the former marina office building, a restroom facility, and the Matthew Henson Center (MHC). *The MHC is a Potomac Electric Power Company (PEPCO) owned facility* ~~The MHC is a former Potomac Electric Power Company (PEPCO) facility that~~ is currently being used by the ECC through a three-party agreement with PEPCO and the NPS. The Park is served by public water and sewer, and power is supplied to the site through overhead lines on First and Half Street, SW. The power lines presently serve the MHC. Power has been disconnected from the former marina office building and restroom facility.

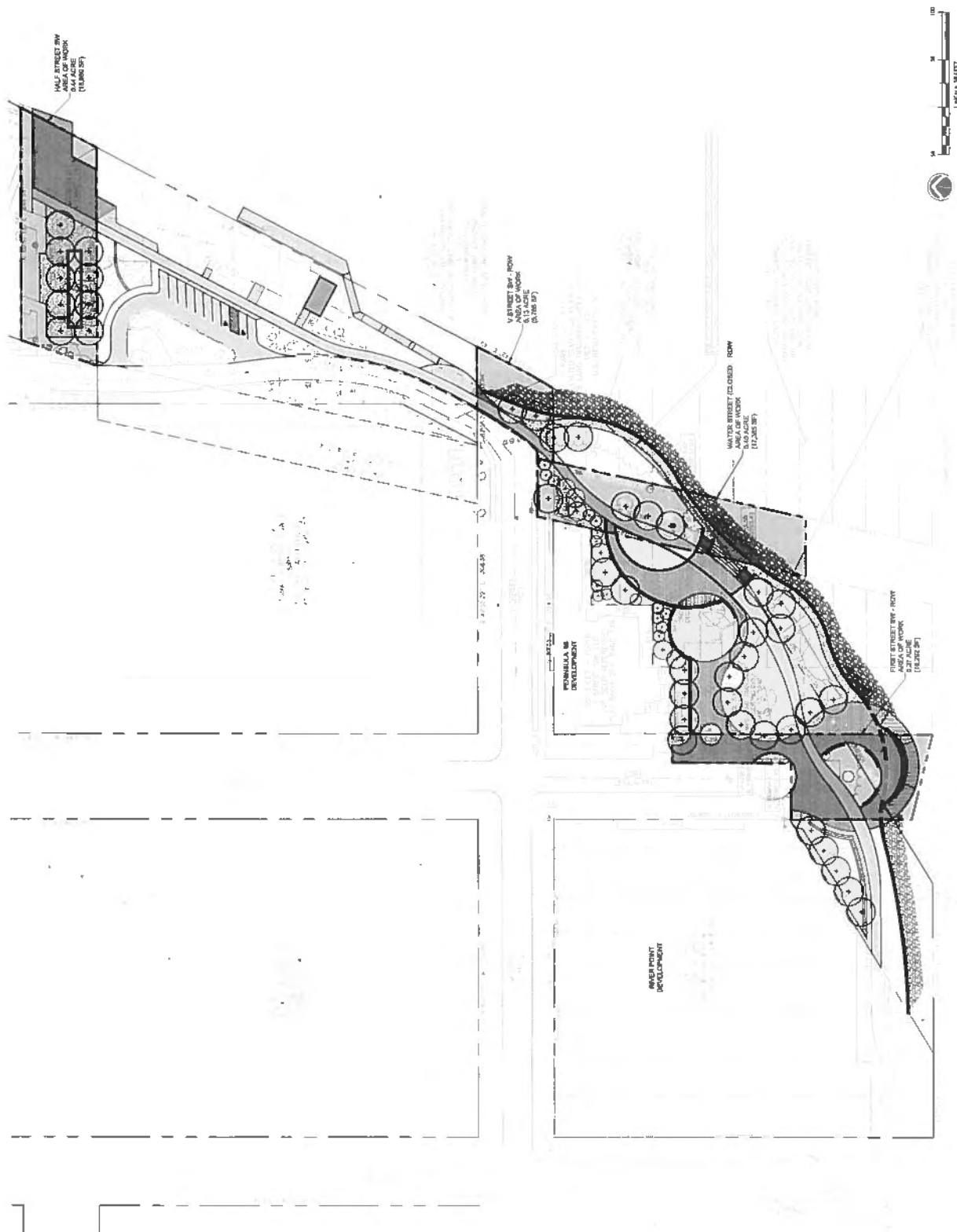
An investigation of above-ground resources concluded that there are three historic properties within the project APE including Anacostia Park, the Fort McNair Historic District, and the Buzzard Point Power Plant. Anacostia Park is eligible for listing in the National Register of Historic Places (NRHP). *A segment of Anacostia seawall, which is a contributing feature to Anacostia Park, is located along roughly 130 feet of the shoreline of Buzzard Point Park.* The Fort McNair Historic District is listed in the DC Inventory of Historic Sites, and is eligible for listing in the NRHP. The Buzzard Point Power Plant, which includes a water intake structure that is now known as the MHC, is currently under consideration by the DC SHPO to be placed on the DC Inventory of Historic Sites. An Assessment of Effects (AoE) was prepared for these properties, ~~which is presently under review by the~~ *and has been reviewed* by the DC SHPO (JMT 2019a). *The NPS initially determined that the project would result in no adverse effect on historic properties. The DC SHPO concurred that the project would have no adverse effect on the Fort McNair Historic District or the MHC, provided that the proposed addition is designed to meet the Secretary's Standards. However, it was later determined that removal of the seawall would be considered an adverse effect. The NPS will work to mitigate this potential adverse effect by developing options to keep the segment of the Anacostia seawall in its current location. If, however, the seawall must be removed, this would constitute an adverse effect and the NPS would prepare a Memorandum of Agreement (MOA) and work with the DC SHPO to consider mitigation measures.*

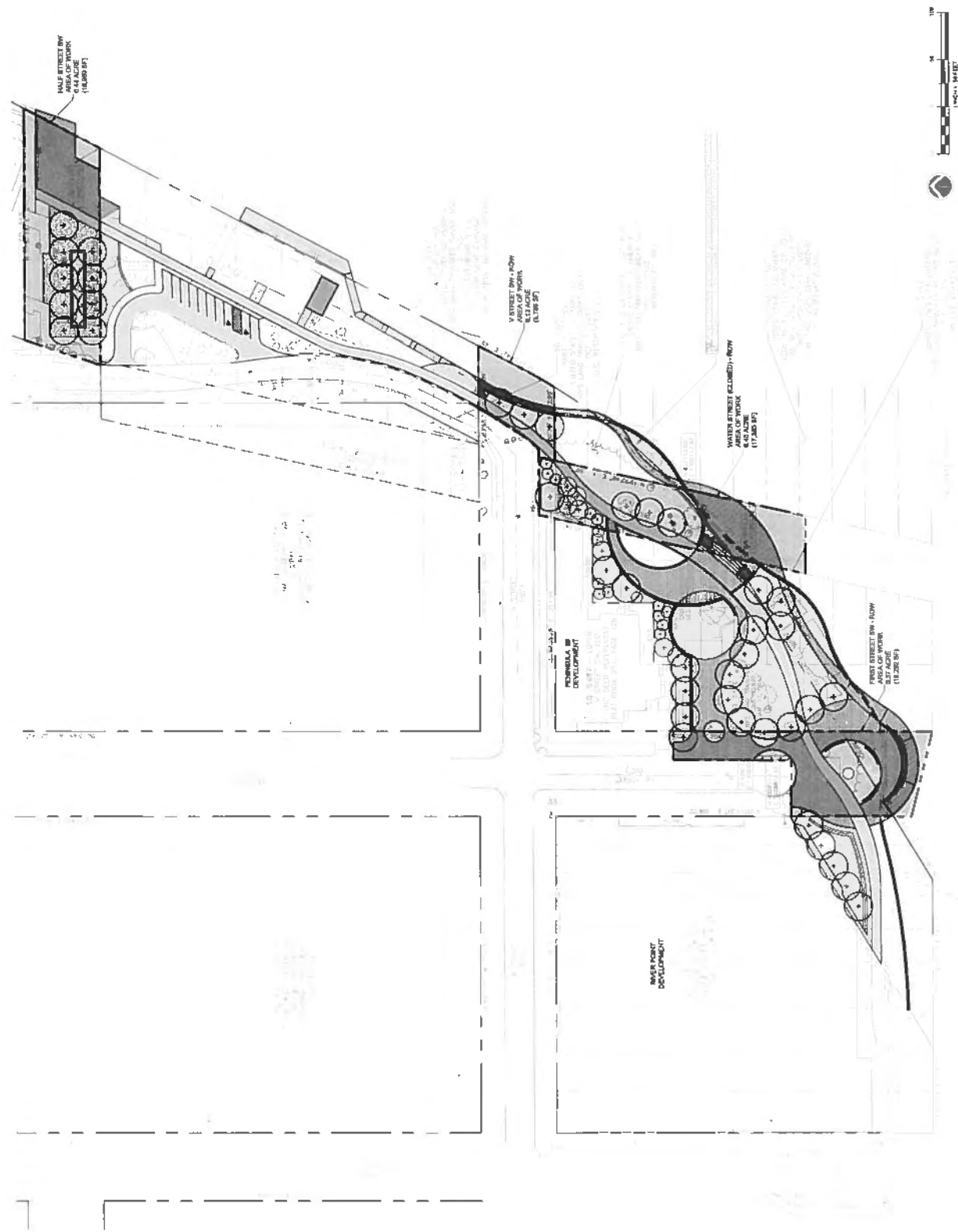
Under the No-Action Alternative, ~~the current level of management of the Park would continue into the foreseeable future. The Park is currently not accessible to visitors, and it would remain this way into the foreseeable future, due to safety hazards and other current conditions. The structures and features that are present today would not be removed, restored, or otherwise improved upon.~~

Text changed to: *the level of Park management would be substantially similar to that of today, except that the remnants of the former marina would be removed and much of the Park would be regraded and replanted to better accommodate visitors. There would be no improvements to the shoreline. New recreational opportunities would not be developed. There would be no publicly-accessible boating dock or restroom facilities.*

~~With respect to the shaded area along First Street, SW shown on Figures 2 and 3, the District of Columbia Department of Transportation (DDOT) controls the right of way (ROW) and is considering design options from both NPS and the Riverpoint Development. Future planning in the DDOT ROW should be accomplished in coordination with the NPS, with a design that is sympathetic with the surrounding designed landscape. Off-shore areas outside of DDOT's ROW (but within the pierhead line) are also administered by the NPS, and would also require some level of NEPA and environmental compliance (e.g., Section 106 of the NHPA, other agency coordination) to facilitate design and construction. Any future proposed work within the riverine wetland area would also be subject to a Clean Water Act (CWA) Section 404 permit and coordination with the U.S. Army Corps of Engineers (USACE).~~

Text replaced with: Within the project area, the District of Columbia Department of Transportation (DDOT) controls right-of-ways (ROW) along First Street, SW, Water Street, U Street and V Street (as shown on Figures 2 and 3). The total area of these ROWs within the project area are 58,443 square feet for both options, which will be confirmed by a survey prepared, signed and sealed by a licensed surveyor in the District of Columbia prior to completion of preliminary design. Full implementation of this plan would require the NPS to coordinate closely with DDOT. NPS will continue to closely coordinate with DDOT prior to completion of Preliminary Design to obtain either a public space permit or other provision that could allow NPS to utilize DDOT ROWs for open space purposes. Off-shore areas outside of DDOT's ROW (but within the pierhead line) are also administered by the NPS, and would also require some level of NEPA and environmental compliance (e.g., Section 106 of the NHPA, other agency coordination) to facilitate design and construction. These areas will be confirmed by a survey prepared, signed and sealed by a licensed surveyor in the District of Columbia prior to completion of preliminary design. Any future proposed work within the riverine wetland area would also be subject to a Clean Water Act (CWA) Section 404 permit and coordination with the U.S. Army Corps of Engineers (USACE).





The NPS reconsulted the DC SHPO in June 2019 by providing a Section 106 Assessment of Effects, or AoE, for Buzzard Point Park Improvements, *which addressed impacts to three historic properties including the Fort McNair Historic District. The AoE addressed the three historic properties and included* a former water intake structure and contributing feature to the PEPCO Power Plant that is now ~~which is currently~~ the MHC, *and a segment of the Anacostia seawall. The Anacostia seawall is considered a contributing feature to Anacostia Park, which is eligible for listing in the NRHP. The NPS determined that the proposed project would have No Adverse Effect on the historic resources within the project APE. Upon review of the AoE, the DC SHPO requested additional information on the Anacostia seawall, to determine if any portion of the sea wall lies within the Buzzard Point Park project area. Coordination with the DC SHPO is ongoing. Through further coordination, it was determined that there would be no adverse effect on the Fort McNair Historic District or the MHC. However, removal of the Anacostia seawall would be considered an adverse effect. Therefore, the NPS will seek design options that maintain the seawall in its current location. If the NPS later determines that the Anacostia seawall cannot stay in its current location, at that time the NPS will prepare a MOA and consider mitigation measures to resolve the adverse effect.*

The NPS initiated consultation with the DC SHPO on May 22, 2018. A Phase IA Archeological Sensitivity Assessment was conducted in 2018. Based on the highly disturbed nature of the area and past industrialization, the study found that no further archeological investigation is warranted. NPS further provided a Section 106 AoE on June 9, 2019. ~~anticipating the proposed project would have No Adverse Effect on historic properties. The DC SHPO is currently reviewing the AoE. In coordination with the DC SHPO, the NPS determined that there would be no adverse effect on two historic properties in the APE; however, the NPS would need to adjust the Park design to avoid an adverse effect on the Anacostia seawall, or otherwise develop a MOA and mitigation measures.~~

The NPS re-initiated consultation with DC SHPO in October and November 2019 regarding newly discovered information about the comfort station slated for demolition. Based on criteria established in the Nationwide Mission 66 Multiple Properties nomination, the NPS determined that the Buzzard Point comfort station is not eligible for listing on the National Register. The DC SHPO concurred with this assessment and the conditional No

Adverse Effect from the previous consultation remained in effect.



United States Department of the Interior

NATIONAL PARK SERVICE

National Capital Parks-East
1900 Anacostia Drive, S.E.
Washington, D.C. 20020

IN REPLY REFER TO:

I.A.2. (NCR-NACE/CR)

SEP 27 2019

Mr. David Maloney
Historic Preservation Office
D.C. Office of Planning
1100 4th Street, S.W., Suite E650
Washington, D.C. 20024

Subject: Section 106 Compliance Final Determination of Effect for Buzzard Point Park Improvements

Dear Mr. Maloney:

In accordance with Section 106 of the National Historic Preservation Act, National Capital Parks-East (NACE), a unit of the National Park Service (NPS), submits for your review our final determination of effect for the Buzzard Point Park Improvement Project. Through consultation with your office on September 13th, the NPS has determined that the Action Alternative — Option 1 (preferred) will have a conditional no adverse effect on historic properties that were identified in the Assessment of Effects report submitted to your office on June 9th and August 12th, 2019. The park initiated Section 106 consultation with your office on March 22, 2018.

Buzzard Point Park is located in the Buzzard Point neighborhood of Southwest D.C. and is bordered on the south and east by the Anacostia River. The NPS proposes to transform Buzzard Point Park into an accessible community waterfront amenity that continues the Anacostia Riverwalk Trail. The Park would provide residents and visitors with more open space, recreational opportunities, and ways to connect with the Anacostia River while enhancing visitor experience of Buzzard Point Park. Three historic properties are located within the project Area of Potential Effect (APE): Anacostia Park, the Fort McNair Historic District and the Buzzard Point Power Plant.

Based on the Environmental Assessment prepared for this project, the NPS has concluded that the No Action Alternative would have No Effect on either historic resource located within the APE. Under the Action Alternative, the Park would be cleared of existing overgrown vegetation and concrete or asphalt remnants, shoreline treatments would be removed, and the former marina office building, restroom facility, and remnant concrete boating ramp would be demolished. Under this action, there are two options for the treatment of the shoreline. Option 1 (preferred) will result in the loss of the remaining stretch of the Anacostia River seawall that remains within Buzzard Point Park. The seawall is considered a contributing feature to Anacostia Park, which is eligible for listing in the National Register of Historic Places. Although this section of seawall has low integrity of association and feeling, it retains moderate to high levels of integrity of location, workmanship, setting, materials, and design. As such, the removal of the seawall would be considered an adverse effect to Anacostia Park.

In an effort to avoid an adverse effect, the NPS will work to retain the existing section of the seawall in its current location and integrate it within the Option 1 (preferred) shoreline design. However, if it is determined that it is not feasible for the wall to remain in its existing location, the NPS will draft a Memorandum of Agreement to mitigate the adverse effects caused by the project.

The NPS seeks your concurrence with our final determination of a conditional no adverse effect. We look forward to continuing our work with you on this project. If you have any questions, please do not hesitate to contact Mike Commisso, Chief of Resource Management at (202) 494-6905 or via e-mail at michael_commisso@nps.gov.

Sincerely,



Tara D. Morrison
Superintendent

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



October 24, 2019

Ms. Tara Morrison, Superintendent
National Capital Parks-East
National Park Service
1900 Anacostia Drive, SE
Washington, DC 20020

RE: Continuation of Section 106 Consultation for the Buzzard Point Park Improvements Project

Dear Ms. Morrison:

Thank you for continuing to consult with the District of Columbia State Historic Preservation Officer (SHPO) regarding the above-referenced undertaking. We are writing to provide additional comments regarding effects on historic properties in accordance with Section 106 of the National Historic Preservation Act.

As you may recall, early consultation with our office resulted in the identification of three historic properties within the Area of Potential Effect – Anacostia Park, Ft. McNair and the PEPCO Power Plant. These properties were evaluated in the Assessment of Effects Report which proposed a finding of “no adverse effect” for the overall project. However, our review of the report made us realize that we had inadvertently failed to identify and consider an important historic property located directly on the project site, specifically a portion of the historic seawall that contributes to the significance of Anacostia Park. Through a series of emails and phone conversations, NPS provided a photograph of the historic seawall (see image below) and engaged in discussions with our office regarding the wall’s condition and a variety of potential treatment options.

Although the seawall is an isolated remnant with somewhat compromised integrity, it is approximately 60’ to 100’ in length and appears to be in relatively good condition when compared to some other sections of the wall. For these reasons, we agree with the NPS that the seawall retains sufficient integrity to continue to contribute to the significance of Anacostia Park and to warrant preservation. We also agree that complete removal of the seawall would constitute an “adverse effect” on historic properties and require the development of a Memorandum of Agreement (MOA).




As outlined in the letter dated September 27, 2019, NPS is proposing a finding of “no adverse effect” conditioned upon retaining the seawall in its current location and incorporating it into the shoreline design for the preferred alternative known as Option 1. We concur with this finding and look forward to consulting further with the NPS regarding retention alternatives. If preservation is ultimately determined infeasible, NPS will make a finding of “adverse effect” and consult to develop a MOA.

Ms. Tara Morrison, Superintendent
Continuation of Section 106 Consultation for the Buzzard Point Park Improvements Project
October 24, 2019
Page 2

Our concurrence is also conditioned upon being provided an opportunity to review plans for the proposed addition to the Matthew Henson Center (aka Water Intake Plant) to ensure that they are consistent with the *Secretary of the Interior's Standards*.

If you should have any questions or comments regarding these matters, please contact me at andrew.lewis@dc.gov or 202-442-8841. Otherwise, thank you again for consulting with our office regarding this undertaking.

Sincerely,

C. Andrew Lewis
Senior Historic Preservation Officer
DC State Historic Preservation Office

18-0425

STATEMENT OF FINDINGS
FOR
EXECUTIVE ORDER 11990 "PROTECTION OF WETLANDS"
AND
EXECUTIVE ORDER 11988 "FLOODPLAIN MANAGEMENT"

**ENVIRONMENTAL ASSESSMENT AND PREPARATION OF SECTION 106 FOR PARK
IMPROVEMENTS TO BUZZARD POINT PARK**

Buzzard Point Park

Washington, DC

October, 2019

RECOMMENDED:

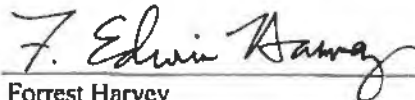


Taja Morrison
Superintendent, National Capital Parks-East

December 5, 2019

Date

CERTIFICATION OF TECHNICAL ADEQUACY AND SERVICEWIDE CONSISTANCY:



Forrest Harvey
Chief, Water Resources Division

January 6, 2020

Date

APPROVED:



Lisa Mendelson
National Park Service
Acting Director Region 1 - National Capital Area

January 31, 2020

Date

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Appendices

Appendix A: Existing Conditions

Appendix B: Proposed Alternative Plan

Appendix C: FEMA Flood Insurance Rate Map

Introduction

The National Park Service (NPS) is proposing to implement improvements to Buzzard Point Park, which is a waterfront park located on an industrialized peninsula adjacent to the Anacostia River in the southwestern portion of the District of Columbia (DC). Since 1957, when jurisdiction of the park property was transferred from the U.S. Army Corps of Engineers (USACE) to the NPS, Buzzard Point Park has been managed by the National Capital Parks-East administrative unit of NPS. Beginning in 1976, Buzzard Point Park served primarily as a small marina operated by a concessionaire under contract with the NPS. In March of 2016, the marina was closed after the latest concessionaire's contract expired.

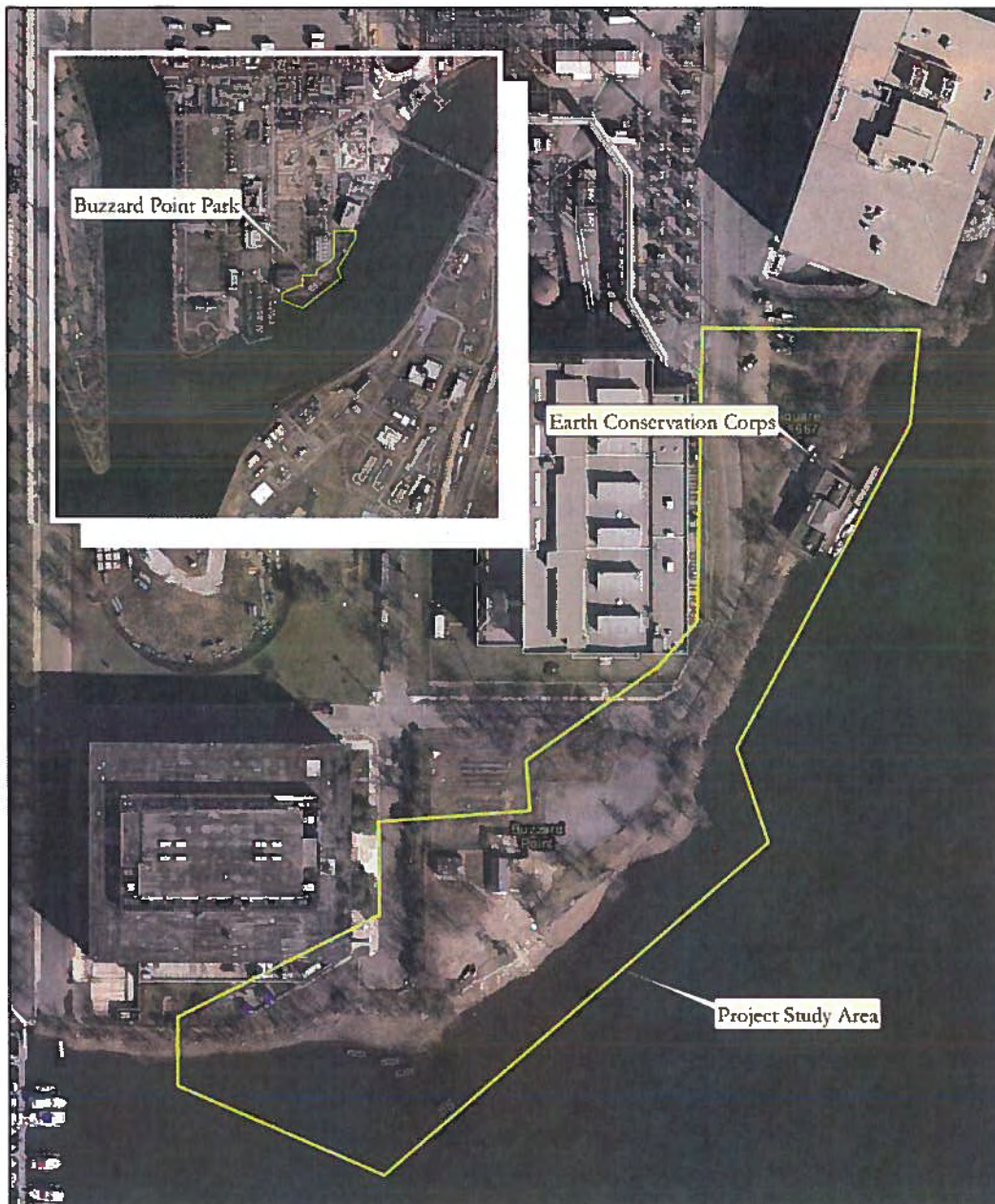
Seeking to transform Buzzard Point Park into a community waterfront amenity, the NPS began the planning phase of the current project following the closure of the marina. A Development Concept Plan was completed in March 2017 that included concept drawings for two potential preliminary alternatives, both of which were designed to take advantage of opportunities that the park property offers and maximize the ability of Buzzard Point Park to meet the needs of the greatest number of visitors. Utilizing public feedback and considering environmental impacts, consideration was narrowed down to one primary design alternative, which is the proposed action alternative described in this document. A sub-alternative of this primary design was also considered and is further described below.

The purpose of this combined Statement of Findings document is to comply with NPS wetland protection and floodplain management procedures. Executive Orders (EO) 11990 (Protection of Wetlands) and 11988 (Floodplain Management) require the NPS and other federal agencies to evaluate the potential impacts of actions in wetlands and floodplains. This document has been prepared in accordance with NPS Procedural Manual 77-1 to comply with EO 11990, and with NPS Procedural Manual 77-2 to comply with EO 11988.

Project Description

The NPS is proposing improvements to Buzzard Point Park in order to transform the park into a waterfront amenity for the surrounding community. Primary objectives for the project are to provide opportunities for the public to connect with the Anacostia River, provide green space as a refuge from the more urbanized surroundings, maximize the number of users that can experience the park, connect the ends of the Anacostia Riverwalk Trail (ART) for an enhanced trail user experience, enhance underutilized spaces, and repurpose the park to provide additional recreational opportunities for current and future users.

Buzzard Point has historically been a difficult portion of Washington, DC to access due to its location on an industrialized peninsula (**Figure 1**). Many of the existing streets are in poor condition and do not have accessible and connecting sidewalks. Pedestrians and bicyclists will have increasingly better access to the park as adjacent development projects rebuild streets in the surrounding area. Following the closure of the marina, efforts to remove the floating piers, docks, and piles were completed. However, the southern and western portions of the park where the old marina was located are currently fenced off and closed to the public. The eastern portion of the park, which features the Matthew Henson Center (MHC), remains open to the public. The existing site conditions can be seen in **Appendix A**.



BUZZARD POINT PARK

Environmental Assessment for Proposed
Buzzard Point Park Improvements
Washington, D.C.

0 75 150 Feet
|-----|-----|



FIGURE 1
Project Area Map of Buzzard Point Park

Proposed Action

The proposed action (Alternative B, see plans in **Appendix B**) would transform Buzzard Point Park into a linear waterfront and gateway park serving as the entrance to the Buzzard Point neighborhood. Major components of the proposed action include shoreline reconstruction, a pedestrian-only Riverwalk trail as well as a multi-use trail, multifunctional recreational areas, and landscaped and green space areas. Within the park is both the ART and a pedestrian promenade separated by landscape features including grass dunes and open lawn areas. The shoreline includes a terraced ledge to provide uninterrupted access to the water's edge. The NPS in cooperation with Potomac Electric Power Company (PEPCO), would repurpose the MHC to provide restrooms and other park support amenities, including handicap parking.

The entire central and southern section of the Park as well as portions of the northern section would be cleared of trees, overgrown vegetation, and remnant concrete or asphalt pads. Infrastructure in the southern portion of the Park, specifically the former marina office building, restroom facility, and remnant concrete boating ramp, would be completely demolished and removed from the site. Much of the Park would be regraded and replanted in accordance with final design plans.

Under the proposed action (Alternative B, Option 1), stone revetment would be placed along the length of the seawall in the Anacostia River to approximately the mean low water level (14 to 21 feet). The stone revetment would act to reinforce and protect the seawall from erosion and storm surge while improving the visual appearance of the shoreline and providing access to the river (**Figure 2**). On the landward side of the seawall, a passive walking trail would follow along the edge of the wall in the central section of the Park. An additional option (Option 2) under Alternative B is being considered that involves replacement of the seawall but does not include the stone revetment. Instead, a central trail overlook would be constructed over the river's edge (**Figure 3**). For the purposes of this Statement of Findings, Option 1 is treated as the preferred alternative.

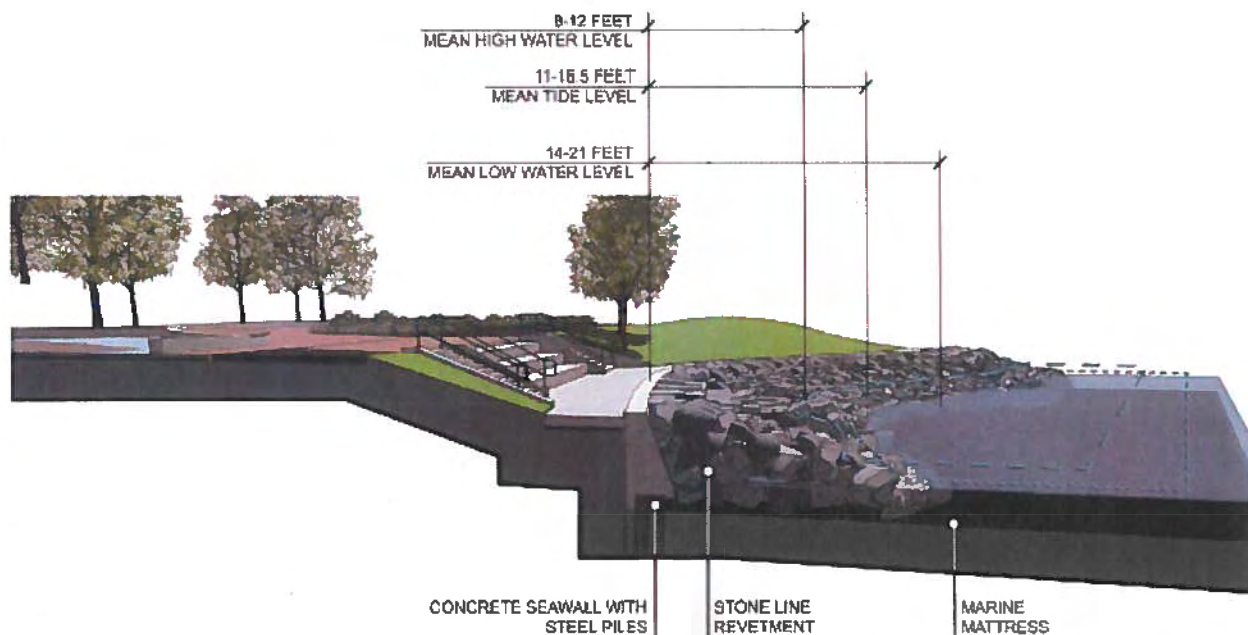


Figure 2
Cross-section of proposed concrete seawall and revetment in Alternative B, Option 1

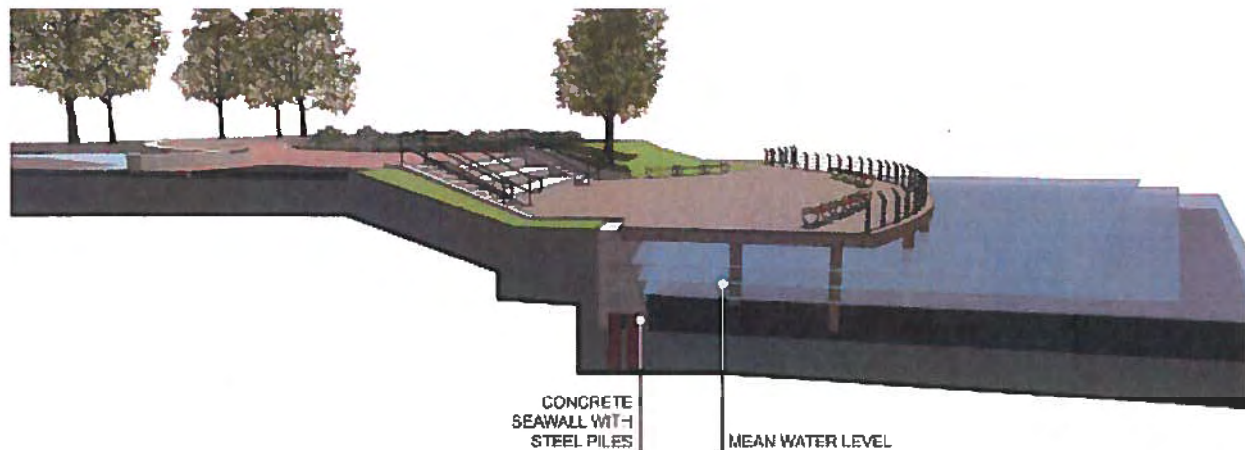


FIGURE 3

Cross-section of the proposed seawall and overlook trail plaza area in Alternative B, Option 2

On the landward side of the seawall, the ART would be extended through the Park, with an approximately eight-foot wide passive (walking) trail that is situated on top of the seawall, and an approximately ten-foot wide multi-use trail perched higher in elevation and running along the central portion of the Park. The multi-use trail would vary in width, up to approximately 16-feet in certain areas, to allow for access to recreational features along the trail without inhibiting flow/circulation.

The proposed trail would tie into the terminus of the existing ART at the southern end of the Park. At various locations throughout the Park, the ART would diverge to form the main multi-use trail, as well as the passive (walking) trail, in order to reconnect to recreational opportunities for visitors. These recreational opportunities would include walking, running, or cycling along the ART, a play area for children, level and mounded (elevated) lawns for observation of the river and of the Capitol Building (looking north along V Street, SW), a dock for users who wish to access the park from the river, and the MHC.

With respect to the MHC, the building will be expanded southward to accommodate restrooms with separate exterior access. The boat dock that is presently accessible by entering the building would also be rebuilt, with new exterior access provided from a separate walkway and pier from the passive (walking) trail. The Center itself would continue to offer educational opportunities that enhance visitor experience. Limited parking options would remain outside the building. Parking would be redesigned to be Americans with Disabilities Act (ADA) accessible.

Just beyond the MHC, the ART would continue its connection north of the Park. Signage would be posted for park visitors at the northern extent of the Park, also adjacent to V Street, SW (central), and near the round-about adjacent to 1st Street, SW in the southern tip of the park. Aside from accessing the Park via the ART, visitors would have ample parking options to select from at the nearby mixed-use development (residential and commercial uses with private and public parking access). Additionally, the Navy Yard Metro Station (Green Line) is located approximately 5,000 feet north of Buzzard Point Park.

Reconfiguration of Roadways and Trail

The reconnection of the ends of the ART on either side of the site will enhance the experience for trail users and eliminate the need for trail users to search out alternate routes (i.e. streets) to reach other parts of the trail. The Park improvements will be done simultaneously with the proposed street widening of Half Street SW, from which the MHC is accessed. This will provide greater accessibility to the proposed facilities and Park after the improvements are complete and the number of visitors increases.

Design Criteria

Executive Order (EO) 11988, Floodplain Management, requires federal agencies to both maximize avoidance of long and short term impacts to floodplains and avoid direct or indirect support of development in the floodplain wherever there is a practicable alternative. Moreover, EO 11988 directs each agency to “reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by floodplains.”

The National Park Service, Director’s Order #77-2 (NPS DO 77-2) applies to all NPS proposed actions that have the potential to adversely affect the natural resources and functions of floodplains or increase flood risks. As stated in DO 77-2, it is NPS’ policy to:

- Protect and preserve natural resources and functions of floodplains;
- Avoid long and short term adverse effects due to occupancy or modification of floodplains;
- Avoid direct and indirect support of floodplain development and actions that have the potential to adversely affect the natural resources and functions of floodplains or increase flood risks; and,
- Restore natural floodplain values previously affected by land use activities within floodplains whenever practicable.

Additionally, and in compliance with EO 11988, any new construction of structures or facilities approved to be located within the 100-year floodplain would require accepted flood-proofing and other flood protection measures to the facilities designed to be applied and would conform to the National Flood Insurance Program (NFIP). In this project, the existing MHC is the only facility that will be involved; however, flood protection and resistance measures would be incorporated into the design of any renovations to the Center.

The District of Columbia participates in the NFIP and has enacted floodplain regulations for all new developments and substantial improvements to a structure located partially or entirely within Special Flood Hazard Areas (100-year floodplain), as outlined in Title 20, Chapter 31 Flood Hazard Rules of the District of Columbia Municipal Regulations. The purpose of the Flood Hazard Rules is to promote public health, safety, and general welfare, and minimize losses due to flooding by:

- “Regulating uses, activities, and development which, acting alone or in combination with other existing or future uses, activities, and development, will cause unacceptable increases in flood heights, velocities, and frequencies;
- Restricting or prohibiting certain uses, activities, and development from locating within areas subject to flooding;
- Requiring all those uses, activities, and developments that do occur in flood-prone areas to be protected in order to prevent flood damage; and,
- Protecting individuals from buying lands and structures which are unsuited for intended purposes because of flood hazards.”

District of Columbia Municipal Regulation 20 also stipulates that habitable spaces in buildings that are located in a floodplain must be located at least 1.5 feet above the minimum elevation of the 100-year floodplain. For this project, the MHC would not be considered habitable, nor would there be any overnight occupation associated with the proposed action.

Site Description

The Buzzard Point Park consists of a collection of parcels owned by the NPS on the southwest waterfront in the District of Columbia. Comprised of approximately 7.72 acres in total, the parcels only feature 3.35 acres of park property on land. The overall site features approximately 1,500 linear feet of shoreline along the Anacostia River. Within the park boundaries are portions of Half Street SW, V Street SW, and First Street SW. The project area is depicted previously in **Figure 1**.

The existing site is served by public water and sewer, and electricity is supplied to the site through overhead lines on First and Half Street SW. These utilities currently serve the MHC the marina office, and the public restrooms facility.

A majority of the existing infrastructure at the park is related to the previous marina use of the property and is in the central portion of the site. A gravel driveway provides access to the site from Half Street. Two structures remain from the marina including an approximately 800 square-foot one-story frame building that housed the marina offices, and an approximately 600 square-foot building that housed the marina's restroom and shower facilities. A variety of paved surfaces occur in the old marina portion of the park including concrete walkways, bituminous walkways, and gravel. A concrete retaining wall is situated next to the old dock facilities and concrete boat ramp.

The MHC is located at the northeastern end of the park and features an approximately 3,600 square-foot two-story brick building accessed by Half Street. This PEPCO facility that is currently being used by the Earth Conservation Corps through an agreement with PEPCO and the NPS. The building sits directly on the Anacostia River with a fixed and floating dock system on the waterfront.

The riverfront edge of the park consists of several different edge treatments, including a concrete platform at the former marina docks, stone seawall, concrete revetment wall, and vegetated areas. The former marina area features a concrete boat launch pad that extends into the river. The ramp is quite steep and does not meet current standards for boat ramps.

Areas of the site that are not developed with pavement or gravel feature either maintained lawn or naturalized vegetation. The areas immediately surrounding the Earth Conservation Corps and former marina consist of maintained turf. Vegetated areas along the riverbanks and on top of the seawalls contain a variety of small trees, shrubs, and woody vines. The existing conditions and site layout are shown in **Appendix A**.

Floodplains

Floodplains are defined by the NPS Floodplain Management Guideline as "the lowland and relatively flat areas adjoining inland and coastal waters, including flood-prone areas of offshore islands, and including, at a minimum, that area subject to temporary inundation by a regulatory flood." The Buzzard Point Park project area occurs on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Panel Number 1100010057C, dated September 27, 2010 (**Appendix C**). The majority of the project area is within a 100-year floodplain (FEMA Flood Hazard Zone AE), in which there is a 1% chance of flooding in a given year. According to the FEMA FIRM map, 100-year flood elevation in the project vicinity is approximately +11.00 feet (FEMA 2010). A small portion of the park in the northwestern end of the project area occurs within the 500-year (0.2% chance) floodplain zone. In the central and southwestern portions of the park, the 100-year floodplain extends much further inland beyond the park boundaries (**Figure 4**).

Floodplain values include the ability of the floodplain to absorb increased water flows, recharge groundwater, and provide floodplain habitat. Floodplain values in the project area are highly limited due to the urbanized nature of the floodplain area and the Buzzard Point peninsula as a whole. Several existing structures and other impervious surfaces occur throughout the 100-year floodplain in the park, including the Earth Conservation Center, old marina, and roadways and parking areas. Vegetated portions

of the park provide minimal floodplain value, as they consist primarily of maintained lawn and a narrow riparian fringe along the riverbank. Long-term stability of the shoreline along the length of the project area is of concern, particularly because Buzzard Point Park is situated close to the confluence of the Anacostia and Potomac Rivers, making the area prone to high wave energy and shoreline erosion.

Wetlands

One riverine wetland (WET-1, the Anacostia River) was identified and delineated in the study area based on the FGDC Wetlands Classification Standard during a field investigation on December 13, 2017 (**Figure 5**). No palustrine wetlands were observed, as all vegetated areas adjacent to the Anacostia River were dominated by vegetation more characteristic of uplands and lacked hydric indicators. WET-1 consists of the western side of the Anacostia River running alongside the eastern portion of the study area, and was classified as a R1UBV system (Riverine Tidal Unconsolidated Bottom, Permanent-Tidal). The riverward side of the WET-1 boundary (2.5 meters below low water elevation) was mapped using the 2013 bathymetric data (DDOE, 2013). The area of WET-1 mapped for the proposed project consisted of approximately 5.69 acres and was delineated as open ended, continuing further to the northeast and southwest. Observable substrate along the banks of the river included silt, cobbles, and boulders. Steep banks with heights of 6 to 8 feet or greater were observed throughout the study area. The deeper portions of the Anacostia River beyond the 2.5-meter wetland boundary line are considered deepwater habitat per the FGDC Wetlands Classification Standard. As stated in Procedural Manual 77-1, deepwater habitats under the FGDC Standard are not considered wetlands and are not regulated by the NPS per EO 11990.



FIGURE 4
Floodplain Map

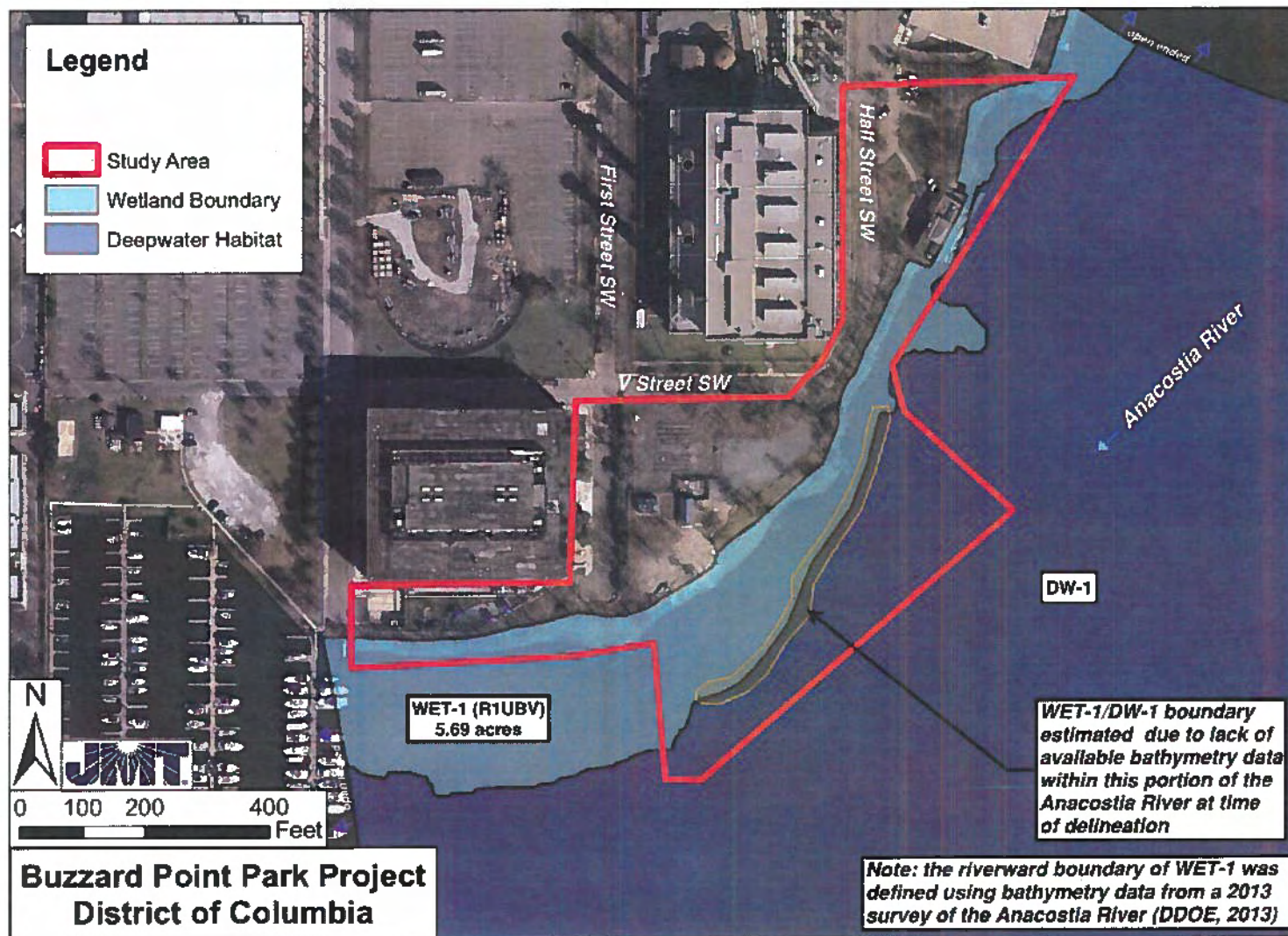


FIGURE 5
Wetlands Map

Wetlands Functions and Values Assessment

The riverine tidal wetland (Anacostia River) within the project area primarily functions to provide freshwater fish, shellfish, and other wildlife habitat, as well as recreational opportunities through boating. Many riverine wetland functions are highly limited due to the existing modification of the shoreline (e.g., stone seawall and concrete revetment walls) and overall urbanized landscape in the project vicinity. Please see **Table 1** below for a summary of the wetland functional assessment.

Based on the current impaired waters list per Section 303(d) of the U.S. Clean Water Act (CWA), the Lower Anacostia River is listed as fully supporting for the designated uses of 'Navigation' and 'Protection and Propagation of Fish, Shellfish and Wildlife', and is listed as not supporting for the designated uses of 'Primary Contact Recreation', 'Secondary Contact Recreation and Aesthetic Enjoyment', and 'Protection of Human Health related to Consumption of Fish and Shellfish'. The primary factors contributing to non-compliance include high levels of *E. coli* and other bacteria, pollutants in the river sediments, and contaminated fish. Sources of pollution that continue to affect water quality in the Anacostia River include combined sewer overflows (CSOs), urban stormwater runoff/storm sewers, municipal point sources, and pollutants from upstream jurisdictions.

Table 1 – Functional Assessment of Riverine Wetland portion of Anacostia River

<u>Functional Value Parameter</u>	<u>Score</u>	<u>Explanation</u>
Flood Protection	Low	Based on the existing features, the proposed project should not result in any additional barriers to flood flow passage or increase the 100-year floodplain.
Water Quality	Low	The U.S. Environmental Protection Agency (US EPA) lists the Lower Anacostia River on the 303(d) list of impaired waters due primarily to high <i>E. coli</i> levels, pollutants in sediments, and toxin-contaminated fish.
Shoreline Erosion Control	Low	The existing river shoreline in the project area is lined in part with stone and concrete walls. Wave energy can be high in the vicinity of the project area due to the confluence of the Anacostia and Potomac rivers.
Aquatic Productivity	Medium	No palustrine wetlands are present adjacent to the river. However, Virginia Institute of Marine Sciences (VIMS) has recorded growing Submerged Aquatic Vegetation (SAV) populations along Buzzard Point Park between 2015 and 2017.
Fish and Wildlife Habitat	Medium	SAV population can provide cover for a variety of fish species.
Aesthetics	Low	Portions of river shoreline are lined with stone/concrete, and areas immediately adjacent to the park are heavily urbanized.
Recreation	Medium	Anacostia River is used for boating, but little public access to the river available in the project vicinity. The river is also not swimmable.

According to data from the VIMS, the presence of SAV has been recorded in the Anacostia River in the immediate vicinity of Buzzard Point Park from 2015 through 2017. The 2017 map depicted an SAV bed with moderate cover running from the southern side of the MHC to the southwestern end of the study area and continuing further west. Species noted included grassleaf mudplantain (*Heteranthera dubia*), coon's tail (*Ceratophyllum demersum*), American eelgrass (*Vallisneria spiralis*), and the non-native invasive water thyme (*Hydrilla verticillata*). SAV serves as important habitat for aquatic life and can also improve water quality and sediment stabilization. SAV beds can benefit both juvenile and adult fish, and are suitable for refuge, feeding, and reproduction. A variety of fish species are known to inhabit the Anacostia River, including blueback herring, alewife, American shad, hickory shad, perch, catfishes, and striped bass.

Justification for Use of the Floodplain and Wetlands

While the site sits almost entirely within the 100-year floodplain of the Anacostia River, providing increased access to the water and increasing user amenities and function of the park is dependent upon its proximity to the Anacostia River and appropriate use of the floodplain. The Park is currently a public safety hazard, being in disrepair and closed off to the public. Much of the site is underutilized. Improving the site will bring increased recreational, educational, and environmental benefits to the community.

Proposed impacts to the Anacostia River would all occur in the portion of the river designated as a riverine wetland. The existing shoreline structures (e.g., concrete revetments and stone seawall) are in disrepair and need to be replaced. Under Option 2, stormwater management features would be built into the park to minimize impacts from erosion. Additionally, some wetland impacts would be avoided (compared to Option 1) because no revetment would be placed in the water along the newly built sea wall. Because the site occurs in the vicinity of the confluence of the Anacostia and Potomac rivers, wave action and river currents are strong and contribute to an increased potential for erosion, which will be addressed through sea wall design. Long-term stability of the Park must be addressed through design.

Alternatives

The environmental assessment prepared for this project considered three alternatives including the No-Action Alternative (Alternative A), the previously described proposed alternative (Alternative B, Option 2), and an alternative that includes revetment placement in the Anacostia River (Alternative B, Option 1). The alternatives to the proposed action (Option 1) are further described below.

Alternative B, Option 2

This alternative is largely similar to the proposed action (Alternative B, Option 1). Under Option 2, a railing would be placed along the edge of the seawall for visitor safety. No stone revetment would be placed. Option 2 includes a passive walking trail along the water's edge with a third overlook trail/plaza area extended out over the water in the central portion of the park. The overlook area would improve visitor experience by providing sweeping views of the Anacostia River. Construction activities in the 100-year floodplain would be similar to the proposed action; however, permanent impacts to the riverine wetland portion of the Anacostia River would be less than the proposed action because a stone revetment would not be placed in the river.

No-Action Alternative

Under the No-Action Alternative, no new facilities would be constructed in Buzzard Point Park. The Park would continue to be inaccessible to visitors due to the safety hazards of the deteriorating features. There would be no recreational opportunities since there would be no access for the community. Existing marina infrastructure, including the marina office, restrooms, concrete boat ramp, and concrete pad, would remain in disrepair and the space would remain underutilized since the facility is unmaintained and closed off to visitors. The ART trail would not continue through the Park and would stay as is, with abrupt endings on the northern and southern sides of the Park. The MHC would remain open as a single use

facility. The existing dock and restrooms at the facility would only be accessible from the inside of the building. Parking accommodations for the Center would remain the same, without Americans with Disabilities Act (ADA) accessibility. The northern portion of the Park would remain overgrown by trees and vegetation, with the view of the Anacostia River partially obstructed. No direct or indirect impacts to the floodplain or wetlands would occur under this alternative.

Project Impacts

Floodplain Impacts

Under both Alternative B options, existing trees, overgrown vegetation, and infrastructure associated with the Park and former marina (concrete, asphalt, buildings) would be demolished and removed, and the existing seawall would be removed and replaced with a reinforced concrete seawall. Other improvements would include an extension of the ART through the Park, a play area for children, level and mounded (elevated) lawns, a new dock, renovations to the MHC and existing dock, and ADA accessible parking.

Impervious surfaces under both Alternative B options include the passive and multi-use trails, public plaza, parking, and the MHC. Grading activities would raise and lower the elevations up to three feet in various locations in the 100-year floodplain; however, the final grading plan would be determined during final design, and site-specific studies would be utilized to adjust the final design and ensure there are no increases to the 100-year water surface elevation on adjacent properties.

Table 2 provides a comparison of impacts to the floodplain for the Alternative B options.

Table 1. Alternative B Floodplain Impacts

Impact	Alternative B, Option 1	Alternative B, Option 2
Temporary Disturbance within 100-year floodplain	156,900 square feet	157,900 square feet
Change in impervious surfaces within 100-year floodplain compared to existing conditions (Permanent Disturbance)	Increase from 52,350 square feet to 70,455 square feet	Increase from 52,350 square feet to 69,030 square feet
Change in impervious surfaces within 500-year floodplain compared to existing conditions (Permanent Disturbance)	Increase from 5,365 square feet to 8,590 square feet	Increase from 5,365 square feet to 8,590 square feet

Under both Alternative B options, impacts to natural functions of the floodplain such as flood storage, flood conveyance, groundwater recharge, habitat, and trapping of sediments would be direct and slightly adverse primarily due to the increase in impervious surfaces, although these functions are already limited under existing conditions. However, impacts to other natural functions of the floodplain such as reducing excessive erosion and removing pollutants from waters are expected to be direct and beneficial due to new features including stormwater management. With regard to flood risk, impacts from Alternative B would be negligible because an increase to the 100-year water surface is not expected and all infrastructure would be designed to resist flood flows and velocities.

When considering the relative magnitude of the Anacostia River floodplain, both options under Alternative B would have negligible direct and indirect impacts to functions of the floodplain and flood risk. Though impervious surfaces within the Park would increase about 20,000 square feet, or about 35%, other aspects of the proposed changes would help to compensate for this impact. Demolition of the former marina office building, restroom facility, and concrete pads would create open space to then be regraded

and replanted. Additionally, the varying widths of the trail extension allow for trail features to be worked around as opposed to taken out, i.e. the trail would be a smaller width to pass by present trees but then wider when there is open space to do so. This culmination of design features work to counterbalance the increase in impervious surfaces associated with the proposed alternative.

Wetland Impacts

Impacts to the riverine wetland portion of the Anacostia River would result from the removal of the concrete boat ramp and replacement of the stone seawall, as well as the placement of revetment along the shoreline in the proposed alternative. Approximately 26,690 square feet of total permanent wetland impacts are anticipated for the proposed action (Option 1) due to the placement of the stone revetment between the seawall and the mean low water level, plus the installation of the proposed overlook trail, dock, and plaza area over the riverine wetland. Total permanent wetland impacts would be reduced under the proposed alternative, Option 2, to 14,539 square feet, and would only result from the installation the proposed overlook trail, dock, and plaza areas that extend out over the river, which is expected to permanently impact and prohibit establishment of SAV underneath these areas.

Table 3 below provides a comparison of temporary and permanent wetland impacts for the Alternative B options.

Table 3. Alternative B Wetland Impacts to the Anacostia River

Impact	Alternative B, Option 1	Alternative B, Option 2
Temporary Disturbance	29,310 square feet	41,461 square feet
Permanent Disturbance from proposed stone revetment between seawall and mean low water level	17,500 square feet	0 square feet
Permanent Disturbance from proposed overlook trail, plaza, and dock areas over the river	7,292 square feet	11,896 square feet
Permanent Disturbance from proposed overlook at First Street, SW to non-NPS wetlands	1,898 square feet	2,643 square feet

Mitigation

Avoidance and minimization measures were incorporated throughout the project design to reduce impacts to sensitive resources. General mitigative measures would also include the use of standard best management practices and erosion and sediment control measures throughout the construction period.

Floodplain Mitigation

The proposed action would incorporate an adequate amount of improvements to the floodplain area to balance out the negative impacts resulting from an increase in impervious area. Consequently, it is not anticipated that the proposed action would significantly alter the natural and beneficial functions of the floodplain; therefore, no floodplain mitigation would be required. The project's proposed infrastructure would be designed to resist flood flows and velocities. Additionally, the design would ensure that there would be no increase to the 100-year water surface on adjoining properties.

As previously discussed, there is no overnight occupation of the MHC associated with the proposed action. Therefore, the potential impact on human health and life accompanying the daily use of the MHC would be mitigated using set procedures which include, but are not limited to, notification, evacuation, and closure by the appropriate authorities, as needed.

Wetland Mitigation

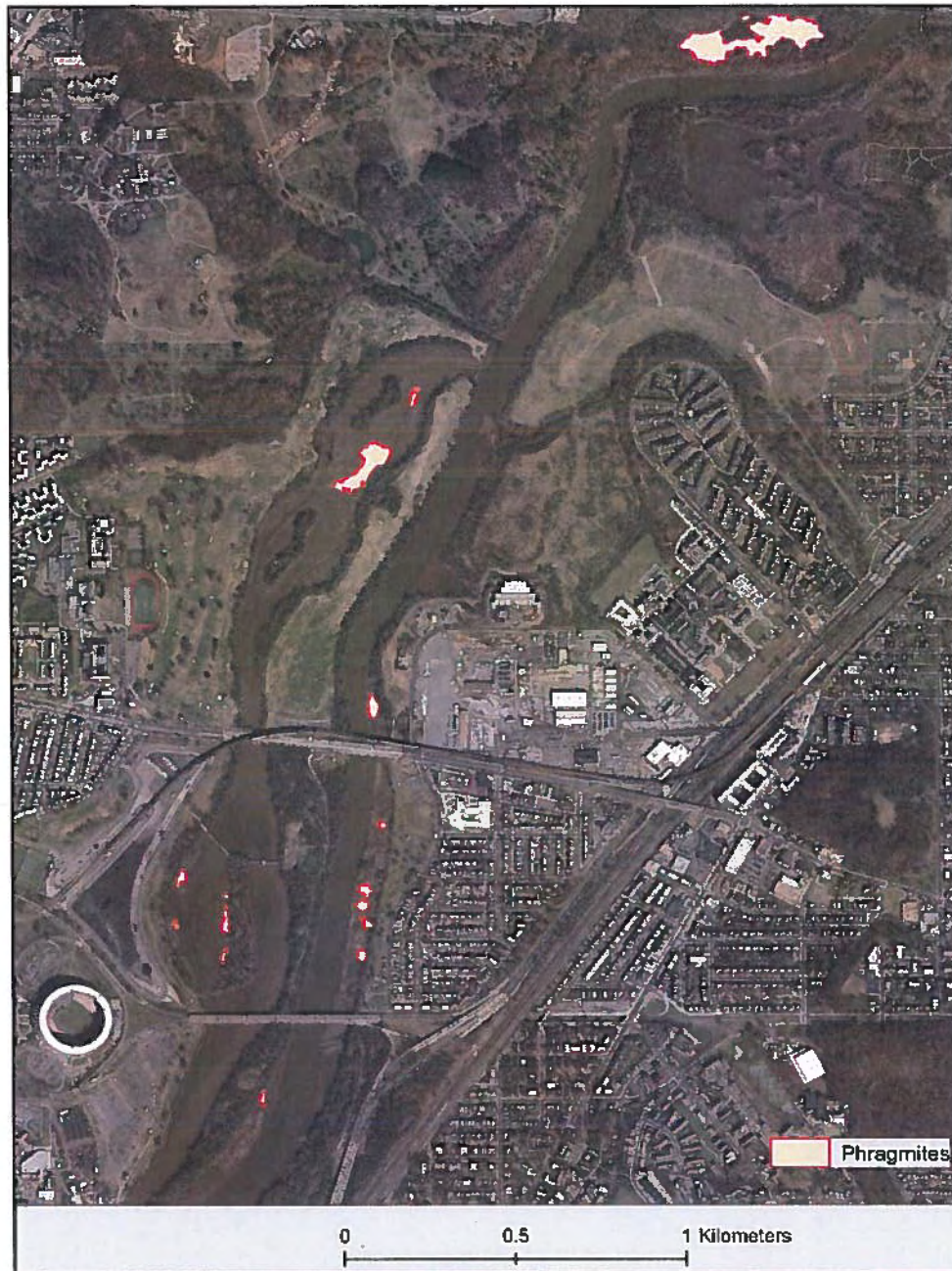
The proposed activity would result in approximately 26,690 square feet (0.61 acres) of unavoidable long-term impacts to tidal wetlands along the Anacostia River. As Per D.O. #77-1, NPS would compensate for unavoidable impacts to wetlands through a mitigation project. Because the wetlands are classified as riverine and open water tidal wetlands, it is inherently difficult to restore the functions and values for these types of wetlands (i.e., open water, unconsolidated river bottom). The difficulty lies in the fact that to restore lost wetland functions on the bottom of the Anacostia River over a relatively small area when compared to the total area comprised of these types of wetland, and the fact that it's in a riverine system creates a situation where the potential for success is low.

As a result, it was determined that in lieu of a typical 1:1 mitigation ratio for the restoration of lost wetland functions and values, NPS would employ a 10:1 mitigation (6.1 acres) aimed at improving the overall functionality and values of near-by wetlands through the removal of invasive plant species. The NPS has identified approximately 11.8 acres of available wetlands in the proximity of Kingman Island and Kenilworth Marsh, located approximately 3.5 miles upstream from Buzzard Point along the Anacostia River on lands administered by the NPS (See Figure 6 for details).

The invasive species removal would target primarily common reed (*Phragmites australis*). Prior to implementation, the Park would determine which wetlands would be treated and timing of treatment to best meet the 6.1 acres of required mitigation and to maximize the potential treatment of the invasive plant species. This treatment would occur within one year of the shoreline treatment and the required riprap on the river bottom has been installed. Any pesticides or other treatment types used would have to be approved in advance by NPS. Pesticide Use Log maintained for all applications would be required and submitted to NPS. Funding for this work would be provided by NACE prior to the implementation of proposal.

Additional mitigation measures will include the restriction of all in-stream work from April 15 to October 15, of any year, to avoid permanent impacts to SAV during the growing season, and from February 15 to June 15, of any year, to avoid disturbance to shortnose and Atlantic sturgeon.

Anacostia Phragmites



Map created by Mikaila Milton, National Capital Parks - East
NAD 83 MD State Plane

FIGURE 6
Potential Wetland Mitigation Areas

Compliance with Development Requirements

Communities that participate in the National Flood Insurance Program, such as Washington, DC, are required to enforce floodplain management regulations that meet the requirements of the National Flood Insurance Program. Furthermore, in order to comply with Executive Order 11988, Federal Agencies must demonstrate there are no reasonable alternatives outside of the floodplain and study ways to reduce the flood risk associated with the proposed action. Therefore, guidelines for regulated development in the 100-year floodplain so that there are minimal impacts to the floodplain, and adherence to general building and development requirements as outlined in the National Flood Insurance Program requirements will be followed.

Development in the floodway is also an issue to consider for compliance purposes. Development is generally not permitted in the floodway, and fill is prohibited in the floodway. The floodplain consists of two types of flood areas: the floodway and the flood fringe. The floodway is the area that encompasses the stream channel and is where floodwaters generally flow the fastest. By definition, it is the area where fill cannot be placed without resulting in a cumulative one-foot rise in the 100-year floodwater elevation. The flood fringe comprises the remainder of the floodplain that extends beyond the floodway area. According to the detailed hydraulic study for Washington, DC, the Anacostia River does not have a designated floodway (FEMA, 2010); however, given the location of the proposed development activities, it is anticipated that impacts within the presumed floodway would be negligible. Therefore, it is anticipated that the proposed actions under the preferred alternative would be able to comply with these requirements.

Conclusions

The proposed action would include activities located within the regulatory 100-year floodplain of the Anacostia River. However, no detriments to the floodplain are expected to result from the improvements. Avoidance of placing cut stone beyond the seawall, and the expansion of impervious areas would not cause any measurable effect to the floodplain due to the magnitude of the floodplain itself. There is no risk to human safety, since the MHC would not be permanently inhabited, and the site could be quickly evacuated in the case of flooding. The project would not increase the risk associated with flooding for the 100-year event and would not result in an increase to the 100-year water surface elevation. Therefore, it has been determined that the proposed action would be consistent with Executive Order 11988.

The riverine wetland area within the Anacostia River would also be permanently impacted by the proposed action due to the replacement of the stone seawall, placement of the stone revetment, and shading beneath overlook trail/plaza areas at the northern and southern ends of the Park, and beneath the dock behind the MHC. This project would adversely impact approximately 0.613 acres of riverine wetlands. A wetland mitigation plan would be developed to adequately compensate for the proposed adverse impacts in order to be consistent with Executive Order 11990.