

FES 97-17

Final
General Management Plan
Development Concept Plan
Environmental Impact Statement

WOLF TRAP FARM PARK

for the Performing Arts • Virginia

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Final General Management Plan / Development Concept Plan and Environmental Impact Statement

WOLF TRAP FARM PARK for the Performing Arts Fairfax County, Virginia

The *Draft General Management Plan / Development Concept Plan / Environmental Impact Statement* described four alternatives for future management and use of Wolf Trap Farm Park for the Performing Arts. The proposed action (alternative 4) would provide sufficient parking for all visitors within the park boundaries without substantial additional paving or structures. To achieve adequate parking space, approximately 3 acres of forested area would be cleared and a portion of the adjacent grass parking areas regraded. The existing paved parking areas would be repaved and striped to allow for maximum capacity. All grass parking would be formalized with lighted walkways for safe and orderly pedestrian passage. The pedestrian circulation of the park would be redesigned to allow for a more organized approach to the Filene Center and associated areas. The existing box office building and ancillary buildings at the plaza would be removed and replaced with a single-story structure that would consolidate all patron and visitor focused functions, including elements and artifacts depicting and interpreting the performing arts. A development concept plan for the box office plaza building and the circle drive area has been included as part of the proposed action. Although the proposed action requires the removal of some forested areas and regrading hills, steps would be taken to retain the rural feel and country character of the site. Patrons would benefit from assured onsite parking. The potential for adverse impacts on water quality would be mitigated through the design of drainage and retention facilities. The other alternatives include continuation of current management practices, or no action (alternative 1), the absorption of most parking impacts on paved lots within the park boundaries (alternative 2), and the accommodation of all vehicles and pedestrians in safe, separate areas and upgrade of support facilities (alternative 3).

The draft document was on formal public review for 45 days, from January 31, 1997, to March 17, 1997, and a total of 11 letters of comment were received. Because the comments did not substantially modify any of the alternatives, propose new concepts for consideration, or supplement, improve, or modify the environmental analyses, this *Final General Management Plan / Development Concept Plan / Environmental Impact Statement* includes only factual corrections and text clarifications to the draft, summaries of substantive comments, and National Park Service responses to those comments. The full text of the draft document has not been reprinted, and this final document must be used as a companion document with the draft.

A record of decision on the final plan will be issued 30 days after this final document has been made available for public review, as announced in the *Federal Register*. For further information about this plan contact the Director, Wolf Trap Farm Park for the Performing Arts, 1551 Trap Road, Vienna, VA 22182.

PREFACE

The *Draft General Management Plan / Development Concept Plan / Environmental Impact Statement* for Wolf Trap Farm Park for the Performing Arts was released for formal public review on January 31, 1997, as announced in the *Federal Register*. Eleven letters of comment were received from government agencies, organizations, and the public. Because of the nature of the comments, the National Park Service has decided to issue an abbreviated *Final General Management Plan / Development Concept Plan / Environmental Impact Statement* that notes clarifying text changes and factual corrections, and that responds to substantive comments.

This shortened format for a final environmental impact statement is in accordance with the *Code of Federal Regulations*, title 40, part 1503. The "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act" state that if changes in response to comments are minor and are confined to factual corrections or explanations of why comments do not warrant further agency response, then they may be written on errata sheets and attached to the draft statement instead of rewriting the draft statement.

The first part of this document corrects errors that were noted in the draft text. For example, numbers of parking spaces in the text, tables, and maps that did not match have been corrected to show actual numbers. The second part of this document responds to comments and clarifies the intent of proposed actions or explains why certain subjects were or were not addressed.

NOTE: Corrections and revisions are noted by section, page number, column, and paragraph.. The phrase "change to read" means that words have been added or deleted. Underlines indicate new text (except for lengthy additions), while strikeouts show deleted text. The word "replace" or "rewrite" means new phrasing for a sentence or paragraph.

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**CORRECTIONS AND REVISIONS TO THE *DRAFT GENERAL MANAGEMENT PLAN / DEVELOPMENT
CONCEPT PLAN AND ENVIRONMENTAL IMPACT STATEMENT***

SUMMARY

ENVIRONMENTAL CONSEQUENCES

Impacts of Alternative 1 (Continuation of Existing Management Practices)

Page vi, column 2, paragraph 5 — Change to read as follows:

Any actions to be undertaken in previously undisturbed locations that have the potential of possessing archeological resources, as determined by an archeological overview and assessment, would be subject to surveying. Archeological surveys would be conducted to determine if archeological resources would be disturbed by any of the proposed developments. If surveys construction activities yield any resources, these sites would be recorded, and mitigation measures would be developed in consultation with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation, in accordance with 36 CFR 800.11.

Impacts of Alternative 2

Page viii, column 1, paragraph 4 — Change to read as follows:

As in alternative 1, any actions to be undertaken in previously undisturbed locations that have the potential of possessing archeological resources, as determined by an archeological overview and assessment, would be subject to surveying. it is not anticipated that any archeological resources would be disturbed by any of the proposed developments. However surveys would be conducted to determine if any sites exist. In addition, if construction activities If surveys yield any resources, these sites would be recorded, and mitigation measures would be developed in consultation with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation, in accordance with 36 CFR 800.11.

Page viii, column 1, paragraph 5, sentence 1 — Change to read and add new sentence as follows:

Long-term positive impacts can be expected on traffic circulation in the immediate area of the park before and after performances, as most vehicles would be accommodated within the boundaries of the park. The vehicular exit process at the end of performances would result in a time period similar to that in alternative 1 to empty the parking lots.

Impacts of Alternative 3

Page ix, column 2, paragraph 4 — Replace as follows:

As in alternatives 1 and 2, any actions to be undertaken in previously undisturbed locations that have the potential of possessing archeological resources, as determined by an archeological overview and assessment, would be subject to surveying. If surveys yield any resources, these sites would be recorded, and mitigation measures would be developed in consultation with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation, in accordance with 36 CFR 800.11. Impacts on archeological sites would be the same as described in alternatives 1 and 2.

Page ix, column 2, paragraph 5, sentence 1 — Rewrite as follows:

Long-term positive impacts can be expected on traffic circulation in the immediate area of the park before and after performances, as most vehicles would be accommodated within the boundaries of the park. The vehicular exit process at the end of performances would result in a time period similar to that in alternative 1 to empty the parking lots. Multiple exits from the parking structure onto the Dulles Toll Road and onto Trap Road would help empty the structure more efficiently. However, the bottleneck that forms at the Trap Road bridge would continue to obstruct the flow of traffic on Trap Road and may obstruct the exits from the structure.

Impacts of Alternative 4 (Proposed Action)

Page xi, column 1, paragraph 2 — Replace as follows:

As in the other alternatives, any actions to be undertaken in previously undisturbed locations that have the potential of possessing archeological resources, as determined by an archeological overview and assessment, would be subject to surveying. If surveys yield any resources, these sites would be recorded, and mitigation measures would be developed in consultation with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation, in accordance with 36 CFR 800.11. Impacts on archeological sites would be the same as described in the other alternatives.

Page xi, column 2, paragraph 1 — Change last sentence as follows:

The vehicular exit process at the end of performances would result in a longer time period similar to that in alternative 1 to empty the parking lots east of Trap Road.

THE ALTERNATIVES

ELEMENTS COMMON TO ALL ALTERNATIVES

Page 21, column 1, preceding **CULTURAL RESOURCE MANAGEMENT** — Add the following section:

NATURAL RESOURCE MANAGEMENT

Under all alternatives, the use of chemicals to promote vegetative growth or to control weeds or pests would be minimized. Integrated pest management and other nonchemical strategies would be used whenever feasible.

Cultural Resource Management

Page 21, column 1, paragraph 3 — Replace as follows:

~~Prior to any ground disturbance, archeological surveys would be performed to determine the presence of any archeological sites or resources. Subsequent construction involving any ground disturbance would be monitored and if any archeological resources were discovered, construction activities would be ceased until a survey could be conducted.~~

A comprehensive parkwide archeological inventory for Wolf Trap Farm Park has been identified as one of the National Capital Region's priorities, but it is anticipated that the archeological overview and assessment will obviate the need for archeological surveying in most of the previously developed areas of the park, areas to which actions that would occur under the alternatives proposed in the general management plan are generally confined. Nonetheless, during design, any actions affecting previously undisturbed locations that have the potential of possessing archeological resources will be examined, and surveyed performed as necessary, to ensure insofar as possible that there are no unanticipated impacts on significant resources. Consultation with the Virginia state historic preservation officer will continue at appropriate stages of preparation of the design and of the archeological overview and assessment.

The following actions would occur under all the alternatives in the general management plan for Wolf Trap Farm Park. Consultation with the state historic preservation officer has been initiated concerning the 3-acre enlargement of the existing parking area on Gil's Hill, and concerning the basis for future determinations of effect under section 106 of the National Historic Preservation Act. It is anticipated that consultation will be completed at the design stage, following the agreed-upon preparation of an archeological overview and assessment. Programmatic exclusions for the actions listed below are covered in the 1995 amendment to the 1990 Programmatic Agreement

between the National Park Service, the National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation.

Actions and Compliance Requirements

Pedestrian walkways widened – anticipated programmatic exclusion under stipulations IV.A and IV.B.6.

Winterize and finish the interior of Filene Center rehearsal hall in backstage area of structure – review not applicable for structure.

Construct comfort station adjacent to concession stand on north side of Filene Center for disabled visitors – review not applicable for structure.

Install overhead lighting system over all major pedestrian walkways for safety and directional purposes – potential need for archeological survey will be identified by archeological overview and assessment, subject to consultation with the state historic preservation officer.

Page 22 — Insert the following section:

IMPLEMENTATION OF CONCEPTS PRESENTED IN THIS PLAN

This *General Management Plan / Environmental Impact Statement* presents a range of concepts to fulfill park objectives and resolve issues. The feasibility of these concepts and the impacts of executing them are also presented in order to compare alternative approaches and weigh their merit. In this conceptual phase exact locations and specifications for infrastructure and other improvements have not been determined. Location and facility specific designs will be done for the alternative selected in the "Record of Decision" prior to any construction. Under any alternative, the final designs will conform to federal, state, and county laws, regulations, codes, and ordinances.

ALTERNATIVE 2

Parking and Pedestrian Corridors

Parking Areas. Page 28, column 2, paragraph 2, sentence 3 — Change to read as follows:

The net increase in spaces of this alternative over alternative 1 would be 116 ~~270~~. This is approximately 552 ~~230~~ spaces fewer than are required by a sold-out performance.

ALTERNATIVE 4 (PROPOSED ACTION)

Development Concept Plan

Parking and Pedestrian Corridors. Page 41, column 2, paragraph 3, sentence 3 — Change to read as follows:

However, it is estimated that up to 3,104 ~~3,300~~ cars could be accommodated in this alternative.

Page 42, column 1, paragraph 3, sentences 3 and 4 — Change to read as follows:

The combination of all of these lots would accommodate approximately 2,400 ~~2,600~~ cars. Approximately 400 ~~600~~ spaces would be allocated for permit parking.

Alternative 4 (Proposed Action) map

Page 43 — Change legend numbers to read as follows:

- (7) Reconfigure and restripe east parking lot (400 ~~450~~ spaces)
- (10) Regrade for grass parking at Gil's Hill (1100 ~~1200~~)
- (24) Regrade and fill to accommodate grass parking at Dimple and Dust Bowl (approximately 400 ~~550~~ spaces and 10 ~~12~~ bus spaces)

TABLE 2: PARKING INVENTORY BY ALTERNATIVE

PARKING AREA

Page 56, column 1, row 6 — Change to read as follows:

Employee parking ~~Parking area #3 (along stage road)~~

ALTERNATIVE 2

Page 56, column 3, row 6 — Change to read as follows:

0 ~~30~~

Page 56, column 3, row 10 — Change total to read as follows:

2,848 ~~2,908~~

ALTERNATIVE 4 (PROPOSED ACTION)

Page 56, column 5, row 4 — Add asterisk (*).

NOTE:

Page 56 — Change to read as follows:

Alternative 2 increases ~~116~~ 176 spaces from existing conditions, and alternative 3 increases 650 spaces from existing conditions. Alternative 2 remote parking would accommodate up to 350 vehicles. Alternative 4 increases ~~372~~ 624 spaces from existing conditions.

*

Page 56 — Change to read as follows:

Alternative 4 includes 10 bus parking spaces. Areas to be used for bus parking.

TABLE 3: SUMMARY OF ENVIRONMENTAL IMPACTS

ALTERNATIVE 2

Page 60, column 3, row 2, sentence 1 — Rewrite as follows:

Long-term positive impacts can be expected on traffic circulation in the immediate area of the park before and after performances, as most vehicles would be accommodated within the boundaries of the park. The vehicular exit process at the end of performances would result in a time period similar to that in alternative 1 to empty the parking lots.

ALTERNATIVE 3

Page 60, column 4, row 2, sentence 1 — Rewrite as follows:

Long-term positive impacts can be expected on traffic circulation in the immediate area of the park before and after performances, as most vehicles would be accommodated within the boundaries of the park. The vehicular exit process at the end of performances would result in a time period similar to that in alternative 1 to empty the parking lots. Multiple exits from the parking structure onto the Dulles Toll Road and onto Trap Road would help empty the structure more efficiently. However, the bottleneck that forms at the Trap Road bridge would continue to obstruct the flow of traffic on Trap Road and may obstruct the exits from the structure.

ALTERNATIVE 4 (PROPOSED ACTION)

Page 60, column 5, row 2, sentence 1 — Change to read as follows:

Long-term positive impacts can be expected on traffic circulation in the immediate area of the park before and after performances, as most vehicles would be accommodated within the boundaries of the park.

Page 60, column 5, row 2 — Change last sentence as follows:

The vehicular process at the end of performances would result in a longer time period similar to that in alternative 1 to empty the parking lots east of Trap Road.

AFFECTED ENVIRONMENT

AIR QUALITY

Page 67, column 1, paragraph 1, last sentence — Change to read as follows:

Currently Fairfax County exceeds the NAAQS for ~~carbon monoxide and~~ ozone.

NOISE

Concert Noise Levels. Page 69, column 1, following paragraph 2 — Add the following sentence:

A table displaying the average sound level measurement results and their duration is provided in appendix I (Bowlby & Associates, Inc. 1994).

CULTURAL RESOURCES

Page 77, column 2, paragraph 2 — Rewrite as follows:

Farmhouse — The farmhouse that currently exists is a building that has experienced additions and alterations through the course of years since the original cabin portion was originally constructed built in the late 17th century. The age of the cabin cannot be traced definitively, although most recent estimates place it in the late 18th to early 19th century. The cabin was a small one-room, one-story log and mortar building that was enlarged as the needs of the occupants changed. When Mrs. Shouse acquired the farm, the house was used as the main residence, with many support farm buildings. Additions made by previous owners, and later during the late 1600s, mid-1800s, and a series of renovations in the 1930s by the Shouses, resulted in the current two-story, multiple room house. Subsequent alterations occurred throughout the Shouse ownership and after NPS acquisition of the property.

Page 79, column 2, following last paragraph — Insert new text as follows:

A limited archeological reconnaissance was conducted at Wolf Trap in late 1978. Areas examined were those having relatively level topography that did not appear to have been subjected to extensive ground disturbances during the course of the park's development. To expedite this study, no data was collected in the vicinity of the historical farmhouse, where it was assumed that archeological resources would be located. Within the areas examined, there were three locations where prehistoric lithic

debris was identified, and one area that appeared to have been used as a debris-disposal site earlier in the 20th century.

The conclusion reached in 1979, following this reconnaissance, was that additional investigation would be appropriate to determine the characteristics and significance of the archeological resources at Wolf Trap, prior to any development that might affect them. It was suggested, however, that the resources were not likely to be eligible for listing on the National Register of Historic Place, due to likelihood of compromised integrity in the vicinity of the farmhouse, to the apparently modern origin of the 20th century dump, and to the absence of diagnostic material at the loci of prehistoric activity.

Because of the possibility of impacts on archeological resources, of as yet undetermined significance, resulting from implementation of developments proposed in the GMP/DCP, the park, in the consultation with the Virginia Department of Historic Resources (the state historic preservation officer) and with the professional staff of the National Capital Region, has recognized the need for preparation of an archeological overview and assessment, as the basis for informed determinations of the effects of undertakings on resources. It is anticipated that the archeological overview and assessment will provide a more thorough examination of historical records than could be accomplished in 1978-79, and closer study of the developmental history of the park. It will, in addition, identify where archeological surveying may need to be performed to ensure that significant resources are not adversely affected by future development.

Consistent with the 1979 recommendation that additional investigation be performed prior to development in the vicinity of the modern dump to determine if any historic or prehistoric resources were present, an archeological shovel test pit survey was conducted at Gil's Hill in 1996 to determine if the 3-acre enlargement of the parking area there would affect potentially significant resources. Only modern debris was found to be present. The impact of that element of development has consequently been determined, in consultation with the state historic preservation officer, not to be adverse. As requested by the state historic preservation officer, the report concerning that survey is to be incorporated into the archeological overview and assessment for the park.

ACCESS AND TRANSPORTATION

Parking Inventory

Page 81, column 2, paragraph 4, sentence 3 — Add to end of sentence as follows:

The east lot, located on the east side of Trap Road, has a semicircular layout and 350 marked spaces, plus 100 additional spaces on turf medians.

Page 82, column 1, paragraph 5, sentence 2 — Change to read as follows:

In 1991, it filled to capacity 19 times; in 1992, 27 times; ~~and in 1993, 35 times; in~~
1994, 26 times; in 1995, 14 times; and in 1996, 16 times.

Table 6: Current Parking Inventory. Page 82 — Change to read as follows:

East parking lot	450 ¹
Accessible parking lot	<u>50</u> 70
Total	<u>2,732</u> 2,752

¹ Includes 100 spaces on turf medians.

ENVIRONMENTAL CONSEQUENCES

IMPACTS OF ALTERNATIVE 1 (CONTINUATION OF CURRENT MANAGEMENT PRACTICES)

Impacts on Natural Resources

Air Quality. Page 93, column 2, paragraph 3 — Change to read as follows:

Wolf Trap Farm Park is situated in an area of nonattainment with the NAAQS for carbon monoxide and ozone.

Impacts on Cultural Resources

Archeological Resources. Page 96, column 2, paragraph 1 — Rewrite as follows:

Any actions to be undertaken in previously undisturbed locations that have the potential of possessing archeological resources as determined by the archeological overview and assessment described in the "Elements Common to All Alternatives" section would be subject to surveying. Archeological surveys would have to be conducted to determine if any resources or sites exist. If surveys construction activities yield any archeological resources or potential sites, these sites would be recorded, and mitigation measures would be developed in consultation with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation, in accordance with 36 CFR 800.11. Impacts would be minimized through monitoring during the construction phase.

IMPACTS OF ALTERNATIVE 2

Impacts on Natural Resources

Air Quality. Page 99, column 2, paragraph 2, sentence 1 — Change to read as follows:

Alternative 2 seeks to address this parking need by providing an additional 116 ~~176~~ parking spaces within the park boundary.

Page 99, column 2, paragraph 3, sentence 2 — Change to read as follows:

Wolf Trap Farm Park is situated in an area of nonattainment with the NAAQS for carbon monoxide and ozone.

Impacts on Cultural Resources

Archeological Resources. Page 104, column 1, paragraph 1 — Rewrite as follows:

As in alternative 1, any actions to be undertaken in previously undisturbed locations that have the potential of possessing archeological resources as determined by the archeological overview and assessment described in the "Elements Common to All Alternatives" section would be subject to surveying. ~~there are no known archeological resources that would be disturbed by any of the proposed development actions. However, surveys must be conducted before construction activities occur. If surveys~~ yield any archeological resources or potential sites were found, these sites would be recorded, and mitigation measures would be developed in consultation with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation, in accordance with 36 CFR 800.11. Impacts would be minimized through monitoring during the construction phase.

Impacts on Transportation

Page 104, column 2, paragraph 2, sentence 2 — Change to read as follows:

The vehicular exit process at the end of sold-out performances would result in a time period similar to that ~~is expected to take a longer period of time than in alternative 1 to empty the parking lots due to increased parking east of Trap Road.~~

IMPACTS OF ALTERNATIVE 3

Impacts on Natural Resources

Impacts on Air Quality. Page 107, column 2, paragraph 1, sentence 3 — Change to read as follows:

Wolf Trap Farm Park is situated in an area of nonattainment with the NAAQS for ~~carbon monoxide and ozone.~~

Impacts on Cultural Resources

Archeological Resources. Page 110, column 1, paragraph 1 — Rewrite as follows:

As in alternatives 1 and 2, any actions to be undertaken in previously undisturbed locations that have the potential of possessing archeological resources as determined by the archeological overview and assessment described in the "Elements Common to All Alternatives" section would be subject to surveying. ~~it is not anticipated that any-~~

archeological resources would be disturbed by any of the proposed development actions. However, before construction activities occur, archeological surveys would be conducted to determine if any archeological resources or sites exist. If surveys yield any archeological resources or potential sites are found, these sites would be recorded, and mitigation measures would be developed in consultation with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation, in accordance with 36 CFR 800.11. Impacts would be minimized through monitoring during the construction phase.

Impacts on Transportation

Page 110, column 2, paragraph 1, sentence 2 — Change to read as follows:

This would eliminate patron parking in adjacent neighborhoods during sold-out performances, thus greatly reducing traffic noise and congestion in these areas during those times.

Page 110, column 2 — Add new paragraph 3 as follows:

The vehicular exit process at the end of sold-out performances would result in a time period similar to that in alternative 1 to empty the parking lots. Multiple exits from the parking structure onto the Dulles Toll Road and onto Trap Road would help empty the structure more efficiently. However, the bottleneck that forms at the Trap Road bridge would continue to obstruct the flow of traffic on Trap Road and may obstruct the exits from the structure.

IMPACTS OF ALTERNATIVE 4 (PROPOSED ACTION)

Impacts on Natural Resources

Air Quality. Page 112, column 2, paragraph 2, sentence 2 — Change to read as follows:

Wolf Trap Farm Park is currently an area of nonattainment with the NAAQS for carbon monoxide and ozone.

Impacts on Cultural Resources

Archeological Resources. Page 116, column 2, paragraph 1 — Rewrite as follows:

As in the other alternatives, any actions to be undertaken in previously undisturbed locations that have the potential of possessing archeological resources as determined by the archeological overview and assessment described in the "Elements Common to

~~All Alternatives” section would be subject to surveying. it is not known if any archeological resources would be affected under this alternative. An archeological survey would have to be conducted before any construction activities occur. If surveys any of the proposed construction activities yield archeological resources or potential sites, these sites would be recorded, and mitigation measures would be developed in consultation with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation, in accordance with 36 CFR 800.11. Impacts would be minimized through monitoring during the construction phase.~~

Impacts on Transportation

Page 117, column 1, paragraph 1, sentence 2 — Change to read as follows:

Patron parking in neighborhoods would be eliminated, greatly reducing traffic noise and congestion in these areas during sold-out performances.

Page 117, column 1, paragraph 3, sentence 1 — Change to read as follows:

The vehicular exit process at the end of sold-out performances would result in a longer time period similar to that in alternative 1 to empty the parking lots ~~east of Trap Road than in alternatives 1 and 2.~~

COMPLIANCE WITH FEDERAL AND COMMONWEALTH LEGISLATION, POLICIES, AND REGULATIONS

National Historic Preservation Act

Page 120, column 1, paragraph 2, sentence 2 — Change to read as follows:

In 1997, the Virginia state historic preservation officer ~~has~~ concurred that the structures are not eligible for listing on the national register.

Page 120, column 1, paragraph 3 — Rewrite as follows:

Throughout the planning process, the Virginia state historic preservation officer will be involved through coordination with the park. Cultural resource compliance will be completed under the provisions of the 1990 programmatic agreement. ~~in coordination with the Virginia state historic preservation officer and the Advisory Council on Historic Preservation. The general management plan specifies any further cultural resource surveys for implementation of the alternatives.~~ This servicewide agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers was amended in July 1995. Stipulations VI.C through E indicate that general management plans may constitute the basis for consultation under 36 CFR 800.4–6 on individual undertakings

if sufficient information exists for resource identification, determination of national register eligibility, and assessment of effect. Without such information, section 106 consultation will be initiated or completed at subsequent stages in the planning process, such as development concept plans. The "Cultural Resource Management" section of the "Elements Common to All Alternatives" addresses actions that would occur under the alternatives and whether they are categorical exclusions under the programmatic agreement or if further compliance or consultation with the state historic preservation officer is required.

Short-term "Roving" Average Sound Level Measurement Results (dB)
(B&K=B&K Meter, Met=Metrosonics Analyzer)

Date	Site	Time	Length (min)	B&K Leq	Met Leq	Comment
7/5	8	08:29 PM	5	51		Insect Noise & Toll Road
7/5	11	08:57 PM	5	48		Some Toll Road
7/5	7	10:54 PM	10	41		Toll Road is background
7/5	9	11:16 PM	10	43		Toll Road is background
7/5	10	11:34 PM	10	44		Sparse traffic on Towiston
7/5	17	11:53 PM	-	40 *		Toll Road is background, Birds/Insects
7/6	16	12:02 AM	-	39 *		Toll Road is background noise
7/6	22	04:10 PM	5	50		All Toll Road
7/6	4	04:33 PM	7	53		All Toll Road
7/6	5	04:47 PM	5	59		All Toll Road
7/6	7	05:06 PM	5	50		Toll Road is majority, some Trap Road
7/6	10	05:30 PM	10	53		Trap Road noise
7/6	23	06:22 PM	10	48		No definable single source; birds, insects
7/6	16	07:07 PM	5	48		Toll Road is background
7/6	16B	07:25 PM	5	48		Area noise blends w/ Toll Road
7/6	18	07:48 PM	5	46		Area noise blends w/ Toll Road
7/6	19	08:08 PM	5	48		Toll Road is majority of noise
7/6	20	08:27 PM	5	47		Toll Road is dominant noise source
7/6	3	08:53 PM	10	42		Toll Road is main noise source
7/16	10	06:10 PM	10	55		Towiston traffic, pre-concert
7/16	19	08:20 PM	5	51		Area noise, insects w/ Toll Road
7/16	18	08:30 PM	6	52		Toll Road & insects, no Filene
7/16	16B	08:48 PM	5	52		Insect noise dominates, Filene occasionally audible

APPENDIX I: SOUND LEVEL MEASUREMENT RESULTS

Short-term "Roving" Average Sound Level Measurement Results (dB)
(B&K=B&K Meter, Met=Metrosonics Analyzer)

Date	Site	Time	Length (min)	B&K Leq	Met Leq	Comment
7/16	17	09:08 PM	5	48		Intermission, insect noise dominates
7/16	9	09:30 PM	2	49		Insects, Filene not audible
7/16	11	09:44 PM	2	45		Insects & Toll Road are equal contributors
7/16	23	09:55 PM	2	41		Insect noise, Filene not audible
7/16	10	10:30 PM	10	52		NB Towiston traffic, post-concert
7/17	10	06:31 PM	5	56	56	Towiston traffic, pre-concert
7/17	17	06:58 PM	2	59		Plane flyover
7/17	7	08:18 PM	-	57 *		Music and vocals audible and dominating
7/17	8	08:31 PM	-	57 *		Music and vocals audible
7/17	9	08:45 PM	-	52 *		Vocal pushes level to 52.0 dB
7/17	23	08:53 PM	-	53 *		Vocal push, background is 49 dB
7/17	11	09:12 PM	7	46 *	49	Vocal push, insects @ 43 dB (Met Leq affected by plane)
7/17	16B	09:28 PM	5	50 *	50	Music is audible, does not raise levels
7/17	17	09:41 PM	5		54	Loud songs, crowd affect levels, up to 51.8 dB
7/17	19	10:00 PM	6		52	Filene audible, producing 54 dB
7/17	20	10:15 PM	7		57	Filene is audible, does not raise above 57 dB backgrnd
7/17	10	10:41 PM	-		**	Towiston traffic, post-concert traffic
7/18	10	06:00 PM			**	Towiston traffic, pre-concert
7/18	7	08:15 PM	5		49	Toll Road is main source, Filene is audible
7/18	4	08:40 PM	7		55	Music is noise source
7/18	16B	08:54 PM	6		52	Music produces 51-52 dB at times
7/18	17	09:08 PM	7		54	Filene is main noise component
7/18	19	09:34 PM	7		57	Music is 56-58 dB consistently

COMMENTS AND RESPONSES

COMMENTS

RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

MAY 05, 1997

Mr. Richard Wilt
Director
Wolf Trap Farm Park for the Performing Arts
1551 Trap Road
Vienna, Virginia 22182

RE: Re: Draft General Management Plan/Development Concept Plan and Draft Environmental Impact Statement; Wolf Trap Farm Park, Fairfax County, VA

Dear Mr. Wilt:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above referenced project. We have rated Alternative 1, the continuation of current management practices or the "No Action" Alternative and Alternative 3 as LO (Lack of Objections). We have assigned the rating of EO (Environmental Objections) to Alternative 2 and EC (Environmental Concerns) to Alternative 4, which is the proposed action. EPA has assigned an overall rating of 1 (Adequate) to the overall adequacy of the document. A copy of the EPA rating system is enclosed for your reference.

Alternative 3 has the least impact on the Park's natural resources while providing for its long term management objectives. It would accommodate all vehicles and pedestrians through the construction of a parking structure on site and the upgrade of the existing paved parking lots to absorb all performance-generated parking impacts. Grass parking would be eliminated and the box office plaza would be redesigned for patron and visitor services. This alternative would separate vehicular traffic from pedestrians and enhance the country setting and ambience of the park. This alternative would reduce environmental impacts by eliminating the grass parking and restoring the approximately 10 acres for habitat use by species that prefer parkland-open vegetation including small mammals and birds. This alternative would also provide for better water quality management practices on site through removal of some existing paved parking lots which would, along with the elimination of the grassed areas currently used for parking, allow percolation of storm water into the ground rather than discharging as sheet flow directly into Wolf Trap Run. It would provide greater undisturbed open space in a region that is extensively developed. However, the costs associated with Alternative 3 are estimated to be close to 45 million dollars. EPA realizes that these costs may be prohibitive in today's fiscal climate for the implementation of this alternative.

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Comments and Responses

COMMENTS

RESPONSES

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Alternative 2 presents greater environmental concerns because of its increased paved surfaces for patron parking. This alternative would directly impact 18.25 acres by paving where grasses and forests currently exist and permanently remove the soils in these areas from productivity. Approximately 11.23 acres or 45% of the parkland-open vegetation class habitat would be lost within the park's boundary. Potential impacts to wildlife would be loss of habitat to small mammals and avian species. The most critical habitat impacts would be the proposed conversion of approximately 7.3 acres of hardwood forest for development purposes. This loss of habitat would impact the existing scarcity of larger mammals that depend on this habitat type not only within the park's boundaries but in a region where extensive urban development has taken place. The potential impacts to water quality are also of concern. The quality and quantity of water that would be discharged to Wolf Trap Run via runoff could have direct and significant impacts. This alternative would likely increase peak flood levels and have downstream implications for both flood periodicity and extent. The quality of water would be expected to be degraded by inputs of contaminated surface water runoff.

Alternative 4, the proposed action, would provide adequate parking within the park without adding new paved area or structures to the park. This would be accomplished by expanding the grass parking into areas that are currently hardwood forest. Approximately 3 acres of hardwood forest would be converted to grassy parkland from the implementation of this alternative. Impacts to larger mammals and birds, especially the resident population of pileated woodpeckers, are expected to occur from the loss of upland hardwoods causing species displacement. Loss of natural forest area will contribute to this type of community loss in a region that is currently facing continued encroachment by urban development. Impacts to Wolf Trap Run from the new parking areas could result in a slight incremental increase in peak flows and discharge rates for the creek. However, grassed parking lots will be graded and designed to control runoff. Visitor and patron facilities will be combined into a single story structure on the plaza. The costs associated with the proposed action are estimated to \$13.5 million dollars.

EPA believes that the potential environmental impacts associated with the implementation of Alternative 4 can be minimized using appropriate mitigation measures. We strongly support the recently initiated water quality monitoring of Wolf Trap Run and the mitigation measures identified in the DEIS for storm water control. Although the loss of hardwood forest cannot be completely mitigated, we agree with the retention of selected trees and mimicking the natural edge of the forest in designing the new parking area. We also believe this project has opportunities for incorporating some pollution prevention measures. In October 1990, Congress passed the Pollution Prevention Act which calls for a stepwise approach to addressing pollution. Some suggestions that might warrant your consideration are recycling receptacles, use of recycled goods in the visitors facility, siting and designing the building to reduce energy consumption and reducing water consumption by specifying low flow toilets. Lighting for the pedestrian pathways could utilize energy efficient fixtures. Painting projects should make use of latex paint instead of

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oil or polyurethane-based paints. Landscaping in the plaza area that utilizes drought resistant native vegetation would minimize the use of water resources.

Although Alternative 3 has fewer environmental impacts than the other alternatives, we believe with strict adherence to proposed mitigation measures and use of pollution prevention techniques that the environmental impacts of Alternative 4 can be minimized to provide for the needs of the Wolf Trap Farm Park within fiscally realistic terms. Thank you for the opportunity to comment on this DEIS. Please contact Marria O'Malley Walsh at (717)628-9685 if you have any questions regarding our comments.

Sincerely,



John Forren, Program Manager
NEPA & Wetlands Regulatory Review

COMMENTS

RESPONSES



NATIONAL CAPITAL PLANNING COMMISSION

COMMISSION MEMBERS

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U.S. House of Representatives
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Mayor, District of Columbia
Honorable Marion S. Barry, Jr.

Chairman, Council of the District of Columbia
Honorable David A. Clark

IN REPLY REFER TO:
NCPC File No. 5689

MAR 12 1997

Mr. Rick Wilt
Director
Wolf Trap Farm Park for the Performing Arts
1551 Wolf Trap Road
Vienna, Virginia 22182

Dear Mr. Wilt:

Thank you for the opportunity to review the Draft General Management Plan (GMP)/Development Concept Plan (DCP)/Environmental Impact Statement (DEIS) for the Wolf Trap Farm Park for the Performing Arts, Fairfax County, Virginia. At its March 6, 1997 meeting, the Commission approved comments for the Department of the Interior's consideration in preparation of the final document.

The Commission commends the Department of the Interior for preparing this combined document to help guide the land use planning and operations of the park, better accommodate patrons, and attempt to reduce off-site impacts. After reviewing the various options, the Commission supports your preferred alternative, Alternative 4. Your plans for accommodating nearly all sold-out performance parking needs on-site will positively affect the residential neighborhood by reducing, if not eliminating, off-site parking requirements. Also, providing on-site parking enhances the visitor experience by making parking spaces more convenient to patrons. Finally, the provision of more pedestrian and lighted walkways should improve pedestrian and vehicular circulation and reduce potential pedestrian and vehicular conflicts.

EXECUTIVE DIRECTOR
Reginald W. Garth

While we support your efforts to improve conditions at the Park, we recommend the final document address in more detail several environmental, landscape preservation, and transportation issues. The National Park Service (NPS) should consider planting additional trees on-site to compensate for the loss of three acres of trees that will occur as a result of the proposed grass parking area on Giff's Hill. If NPS pursues such a plan, areas where environmental benefits (e.g., erosion and sedimentation control) would occur should be given priority. We caution, however, that new trees should not interrupt the open, pastoral vistas and views so characteristic of the total setting.

We also request that the noise quality assessment discuss the duration of noise exceedences when they occur. In addition, although the traffic surveys were

1. Additional trees would be planted in the new pedestrian and vehicular circulation plan to give visual indicators of walkways, to guide traffic and parking, and to separate and enhance certain areas visually. Final landscape plans will be developed for each reconfigured area in conjunction with the construction phase.
2. Average sound level measurements and their duration have been added to the report.
3. The opening of the Nissan Pavilion in 1995 has had little or no effect on the traffic or parking conditions at Wolf Trap at a sell-out performance. During the 1995 season at Wolf Trap, 15 of the 85 performances were sell-outs. In 1996, 14 performances were sell-outs, but the parking exceeded the onsite parking supply 23 times. The performances at the Nissan Pavilion may have caused some minor changes in the venue at Wolf Trap in an effort to stay competitive with the Nissan Pavilion. It is anticipated that at least 15 performances per season will continue to be sell-outs.

COMMENTS

Mr. Rick Wilt
Page Two

- 3 conducted fairly recently, we suggest that the document note if more recent events, such as the construction of the Nissan Pavilion in Manassas, have or will affect traffic and parking conditions in the vicinity of Wolf Trap Farm Park. Furthermore, we
- 4 suggest NPS study demand management strategies, such as preferential parking for carpools and vanpools.

- 5 NPS should submit a final master plan for the Park to the Commission for its approval following completion of the EIS. Typically, during its review, the Commission would refer the master plan to Fairfax County, the Northern Virginia Planning District Commission, the Metropolitan Washington Council of Governments, and the Virginia Department of Transportation for their review and comment before taking final action. As you proceed with completion of your document, we suggest you consult with these agencies to identify any potential concerns they might have. We also encourage you to coordinate your master planning efforts with our staff who can meet with you to discuss the submission process and planning issues. Enclosed for your use is a copy of our Master Plan Submission Requirements.

Finally, we encourage NPS to seek funding for the proposed capital improvements to enhance the visitor experience. We hope our comments will be useful for supporting the need for park improvements.

We appreciate your consideration of our comments and recommendations which the enclosed Executive Director's Recommendation discusses in greater detail. Please let us know if we can be of further assistance during the environmental documentation process.

Sincerely,

Reginald W. Griffith

Reginald W. Griffith
Executive Director

Enclosures

cc: John Parsons, National Park Service

RESPONSES

4. The concept of providing preferential parking for carpools and other high occupancy vehicles was considered in this process. Due to the labor intensive nature of parking on unpaved lots, and having to staff several parking lots simultaneously (i.e., the permit parking for the disabled and donors, and the regular parking), this option would be difficult to execute. However, the park will continue to study the feasibility of this strategy.
5. The final GMP/EIS and final design and construction plans will be submitted to the entities named for their review and comment prior to construction.

COMMENTS



COMMONWEALTH of VIRGINIA

H. Alexander Wise, Jr., Director

Department of Historic Resources

211 Governor Street
Richmond, Virginia 23219

March 19, 1997

Richard A. Wilt, Director
United States Department of the Interior
National Park Service
Wolf Trap Farm Park for the Performing Arts
1551 Trap Road
Vienna, Virginia 22182

Re: Draft/General Management Plan/Development Concept Plan/EIS
Wolf Trap Farm Park for the Performing Arts
Fairfax County, Virginia
DHR File Number 94-2201-F

Dear Mr. Wilt:

Thank you for requesting our comments on the referenced document.

1

The chapter entitled *Environmental Consequences* concludes with the section *Compliance with Federal and Commonwealth Legislation, Policies, and Regulations*. On page 120 the document states that compliance with the National Historic Preservation Act will be completed under the provisions of the 1990 programmatic agreement. Please note that the Service-wide Programmatic Agreement (PA) among the National Park Service (U.S. Department of the Interior), the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers was amended on July 17, 1995. Stipulations VI.C through E indicate that General Management Plans (GNPs) may constitute the basis for consultation under 36 CFR Part 800.4-6 on individual undertakings, if sufficient information exists for resource identification, determination of National Register eligibility, and assessment of effect. Without such information, Section 106 consultation will normally be initiated or completed at subsequent stages in the planning process, such as Development Concept Plans (DCPs) or implementing plans. During the planning process the park superintendent will make a decision in consultation with the State Historic Preservation Officer (SHPO) about which undertakings are programmatic exclusions under IV.A and B. The approved plan should list all undertakings that are subject to further consultation and the stage of planning at which consultation is most likely to be implemented.

2

The draft GNP/DCP fails to describe proposed actions, whether categorical exclusions or those subject to future consultation, in sufficient detail to allow our Department to comment pursuant to Section 106. On page 120 the document also states that the general management plan specifies

RESPONSES

1. Language within the text of the *General Management Plan* has been revised to incorporate this information.
2. Text has been added to the *General Management Plan* in the "Cultural Resource Management" section under "Elements Common to All Alternatives." Included is a list of actions that are common to all alternatives and which of these are categorical exclusions under the 1990 programmatic agreement (amended in 1995), or are subject to future consultation.

Future cultural resources studies or evaluations recommended for Wolf Trap Farm Park were addressed in the "Future Plans and Studies" section under "Elements Common to All Alternatives." Future archeological surveys and evaluations will be coordinated with the Virginia state historic preservation officer (SHPO) under the guidance of an archeological overview to be developed between the National Park Service, the SHPO, and the Advisory Council on Historic Preservation. In the interim of the final *General Management Plan* and the development of the overview, the actions requiring ground disturbance will be reviewed by the SHPO. These actions have been identified in the "Cultural Resource Management" section under "Elements Common to All Alternatives" in the final *General Management Plan*.

TELEPHONE: (804) 786-3143 TDD: (804) 786-1934 FAX: (804) 225-4261

An Equal Opportunity Agency

COMMENTS

RESPONSES

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any further cultural resource surveys for implementation of the alternatives. However, we find that no specific surveys are recommended. Instead, for each of the four alternatives, it is stated that archeological surveys would be conducted to determine if archeological resources would be disturbed by any of the proposed developments. Please note that, according to stipulation II of the PA, surveys will be coordinated with the SHPOs. In order to facilitate future planning efforts, we recommend that the final GNP/DCP include a list of all undertakings requiring further survey and a proposed schedule.

Affected Environment. The section on cultural resources beginning on page 77 does not discuss archeological resources.

■ **Historic Structures.** Our letter of October 25, 1996 states that we are not able to concur with the Service's determination that the structures within park boundaries fail to meet the criteria for inclusion on the National Register of Historic Places. At your request David Edwards of our Winchester Regional Office met with you on site to discuss this issue. On January 30, 1997 our Department's National Register Evaluation Committee met a second time to consider the structures' eligibility. Based upon the additional information resulting from David Edwards' inspection, the Committee concurs with your determination. We agree that structures within the park boundaries meet the National Register criteria due to their compromised integrity.

3

The document should be revised to indicate that our Department concurred with the determination of eligibility in 1997 (with this letter), not in 1996.

4

■ **Archeological Resources.** This section should include a discussion of the park's potential to contain archeological resources. A reconnaissance survey of portions of the park was conducted in 1978. The inclusion of a map showing the precise areas surveyed at that time would be a helpful addition to the final document. Page 22 states that future plans include a comprehensive archeological survey within park boundaries. It may be more useful for planning purposes to complete an archeological assessment. Such an assessment would incorporate the results of the 1978 reconnaissance and of the historical studies proposed, as well as current environmental models for the location of prehistoric archeological sites developed during numerous recent surveys of Fairfax County, especially those conducted by the County Archeological Services. At present the document does not provide a basis for determining what actions will require archeological survey.

5

The 1978 survey was not coordinated with our Department. The final document should state that future surveys will be coordinated with us in accordance with Section 110 of the National Historic Preservation Act as well as Stipulation II of the 1995 PA.

Alternatives. The description of the four alternatives should be revised to clearly state what ground disturbance is proposed.

6

Environmental Consequences. The environmental consequences of each alternative should include a discussion of effects to archeological resources based on the nature and extent of the

3. The text has been revised to reflect this change.
4. See response 2.
5. Comment noted.
6. Any ground-disturbing activities will be reviewed using the guidance of the archeological overview. Subsequent surveys conducted will determine the existence of archeological resources. See also response 2.

COMMENTS

RESPONSES

6

proposed ground disturbance and the potential of the affected areas to contain intact archeological resources. The specific surveys proposed should be indicated along with the stage of planning in which they will be implemented.

Please do not hesitate to contact Ethel R. Eaton at (804)786-3143 if you have questions or if we may provide any further assistance. We look forward to working with you on this project.

Sincerely,



David H. Dutton
Director, Division of Project Review

c. Susan Long, 106 Specialist, Wolf Trap

COMMENTS

RESPONSES



COMMONWEALTH of VIRGINIA

DEPARTMENT OF TRANSPORTATION
8975 FAIR RIDGE DRIVE
FAIRFAX, VA 22033
(703) 994-7300

DAVID R. GEHR
COMMISSIONER

THOMAS R. FARLEY
DISTRICT ADMINISTRATOR

February, 28, 1997

Mr. Richard Wilt
Director
Wolf Trap Farm Park for the Performing Arts
1551 Trap Road
Vienna, Virginia 22182

Dear Mr. Wilt:

Thank you for the opportunity to review the draft General Management Plan / Development Concept Plan (GMP/DCP) for future management and use of Wolf Trap Farm Park for Performing Arts. The Transportation Planning Section of VDOT's Northern Virginia District Office has reviewed the document, including the four alternatives described in the document.

As I am sure you are aware and have considered, the Dulles Corridor Transportation Study, under the guidance of a Policy Advisory Committee formed by the Virginia Secretary of Transportation, has identified a preferred transportation alternative to be a seamless extension, using Metro-like facilities, of the regional rail system from the West Falls Church station to the vicinity of Route 772 in Loudoun County. There have been several locations identified as potential rail stations, one of which is near the Trap Road overpass, in the median of the Dulles Airport Access Road (to be operational during special events). The actual layout and design of the station will be determined during the preliminary engineering phase in coordination with the Department of the Interior / National Park Service. The final GMP/DCP should provide the flexibility for consideration of a potential future rail station near the Park.

1

1. The possibility of developing a metrorail station at Trap Road was examined. It was estimated that under ideal conditions as many as 10% of the Wolf Trap patrons would use metrorail. The unknown timing of the proposed extension of the metrorail system and the estimated \$15 million cost were issues that were considered in the evaluation of this alternative concept. It was believed that reliance on metrorail as a solution is not a realistic alternative at this time. However, the National Park Service supports the use of mass transportation and would support a station at Trap Road with pedestrian walkways if the stop were to be constructed. No modifications at the park would preclude the construction of a metrorail stop at Trap Road. If a metrorail stop is constructed, the Park Service would make every effort to encourage patrons to use metrorail to attend performances. If ridership exceeded projections, the tree cut area would be restored to forest conditions

COMMENTS

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VDOT concurs and commends "the policy of the Department of the Interior and the National Park Service to take the initiative and to work cooperatively with others to anticipate, avoid and resolve potential conflicts". VDOT will continue to work closely with you as the Dulles rail preliminary engineering work gets underway.

If I can be of any assistance, please feel free to contact me at (703)383-2224.

Sincerely,



Farid F. Allahdoust
Senior Transportation Engineer

CC:

Mr. Thomas F. Farley, District Engineer
Mr. Young Ho Chang, VDOT-NoVa, Assistance District Engineer
Mr. Farid Bigdelli, VDOT-NoVa, Transportation Planning Programs Manager
Mr. William C. LaBaugh, III, Va. Dept. of Rail and Public Transportation

COMMENTS

RESPONSES



**FAIRFAX
COUNTY**

V I R G I N I A

OFFICE OF THE COUNTY EXECUTIVE

12000 Government Center Parkway

Suite 552

Fairfax, Virginia 22035-0066

Telephone: (703) 324-2531 Fax: (703) 324-3956

Richard Wilt, Director
Wolf Trap Farm Park for the Performing Arts
1551 Trap Road
Vienna, VA 22182

Dear Mr. Wilt,

Thank you for providing us with the opportunity to review and comment on the draft General Management Plan/Development Concept Plan and Environmental Impact Statement for Wolf Trap Farm Park (hereinafter referred to as "the EIS"). Through this memorandum, I am transmitting to you the comments of County staff. Please note that these comments reflect only the views of staff and do not necessarily reflect the views of the Fairfax County Board of Supervisors.

We agree with the statement on page 8 of this document that Wolf Trap Farm Park is "an extraordinary and distinctive entertainment facility" and we feel that this facility is a substantial asset to Fairfax County, Northern Virginia, and the metropolitan Washington, D.C. area. We further agree that the "natural enclave and scenic landscape" provided by Wolf Trap "must be maintained and cultivated to preserve the presence and purpose of Wolf Trap Farm Park." We have reviewed the document within this context and within the context of Fairfax County's policies and regulations.

Fairfax County's Environmental Policies and Regulations

Neither the Affected Environment section nor the Environmental Consequences section of the EIS addresses the relationship between the site and the alternatives with Fairfax County's environmental policies and regulations. Of particular note are the County's Chesapeake Bay Preservation Ordinance and the County's Environmental Quality Corridor (EQC) policy. Also of note are the Floodplain Regulations within the County's Zoning Ordinance (although the EIS does, generally, address issues associated with 100-year floodplains). Copies of the Chesapeake Bay Preservation Ordinance, the EQC policy, and Floodplain Regulations are attached for your information.

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1. This *General Management Plan/Environmental Impact Statement* (GMP/EIS) presents a range of concepts to fulfill park objectives and resolve issues. The feasibility of these concepts and the impacts of executing them are also presented in order to compare alternative approaches and weigh their merit. In this conceptual phase exact locations and specifications for infrastructure and other modifications have not been determined. Location and facility specific designs will be done prior to any construction for the alternative selected through the "Record of Decision." Under any alternative the final designs would be consistent with federal, state, and county laws, regulations, codes, and ordinances.

COMMENTS

RESPONSES

Richard Wilt
Page 2

Applying the delineation criteria within the attached documents, the EIS should identify the extent of Resource Protection Areas (RPAs) and EQCs on the property, and identify the potential impacts to these areas associated with each of the alternatives. Encroachments into RPAs should not be pursued unless such encroachments are consistent with the Chesapeake Bay Preservation Ordinance (e.g. allowed uses, exemptions, or uses that could reasonably be considered through an exception pursuant to Article 6 of the Ordinance). Additional encroachments into EQCs also should be avoided to the extent possible.

Except for a possible minor encroachment associated with the construction of a trail, encroachments into the EQC and RPA would not be anticipated for Alternative 1. Alternative 2 would result in significant encroachments into the RPA and EQC associated with Wolftrap Run. Because other feasible alternatives are available, this alternative should not be pursued. Alternatives 3 and 4 could result in minor encroachments into the RPA and EQC, but the extent of such encroachments (if any) is not clear (e.g. the one-lane paved access road for Alternative 4, perhaps a portion of the Gil's Hill parking extension for Alternative 4, and, depending on limits of clearing and grading, perhaps construction work associated with the parking garage for Alternative 3). As discussed above, the EIS should provide such clarification, and encroachments into the RPA should not be pursued unless they are consistent with the County's Chesapeake Bay Preservation Ordinance.

Any alternative that is pursued should be consistent with the stormwater management best management practice (BMP) requirement of the Chesapeake Bay Preservation Ordinance. While it is recognized that the County cannot require implementation of the Chesapeake Bay Preservation Ordinance on federally-owned land, it is also noted that the Environmental Protection Agency has, through a memorandum of agreement with the Department of Defense and the National Park Service, committed to federal compliance with federal, state, and local programs adopted pursuant to the Chesapeake Bay Agreement. As such, compliance with all provisions of the County's Chesapeake Bay Preservation Ordinance, including the BMP provision, is recommended. The EIS should commit to compliance with the Chesapeake Bay Preservation Ordinance and should generally identify how the BMP requirement will be addressed.

Suggested Transportation Improvements

The following improvements are suggested for consideration as part of long range transportation mitigation actions for the Wolf Trap Farm Park. Substantial additional analyses may need to be performed prior to proceeding with some of these transportation improvements. Moreover, the results of these analyses may indicate that these projects may not be feasible. The improvements are as follows:

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COMMENTS

RESPONSES

Richard Wilt
Page 3

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- Capacity improvements to the existing Trap Road bridge over the Dulles Toll Road: This may help alleviate traffic backups along Trap Road created by left-turning traffic to the ramp, which, in turn, impedes flow of southbound traffic on Trap Road heading for Vienna.
- Construction of an exit ramp from Trap Road to the westbound lanes of the Dulles Toll Road: This would help divert some traffic currently using westbound Route 7 and southbound Trap Road to exit the area following performances.
- Addition of a pedestrian walkway to the existing Trap Road bridge and provision of sidewalk connections north and south of the park.
- Construction of a future Wolf Trap Metro Station should a rail project become a reality in the corridor: It is likely that this station would reduce overflow parking problems at the park. Hence, the Wolf Trap Foundation and/or the National Park Service should coordinate with state and local efforts to secure funding for rail improvements in the corridor.

The Parking Shortage

3

The impetus behind the EIS appears to be the inability of existing parking facilities at Wolf Trap to accommodate the demand that occurs during the most popular events at the Filene Center. There is at least one internal conflict within the EIS, however, regarding the severity of this shortfall. The Parking Inventory provided on pages 81 and 82 indicates that there is a shortfall of 470-500 parking spaces. However a much greater shortfall is implied in the discussion of a possible alternative consisting of a combination of remote parking and shuttle, a new rail stop at Wolf Trap, and no on-site parking increases (hereinafter referred to as the "rail station" alternative). The magnitude of the shortfall is a particularly critical issue in that the rail station alternative appears to have been removed from consideration even though it would appear (under full implementation) to be more than sufficient to address the existing shortfall as described on pages 81 and 82. Any internal inconsistencies regarding the parking shortfall should be corrected.

Comments on the Alternatives

Alternative 1:

Alternative 1 is the "no action" alternative. Aside from improvements to pedestrian facilities and

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2. All four of these concepts were considered in the development of the plan but are facilities managed by other jurisdictions. The National Park Service supports the improvements and would coordinate with the appropriate state and county officials in support of the improvements. However, the improvements to the Trap Road bridge to accommodate pedestrians might have a negative effect on the safety of pedestrians and the flow of traffic during performances if parking were to be offered on the south side of Trap Road. The increase in performance time pedestrian traffic would conflict with vehicular traffic using the Trap Road ramps.
3. Inconsistencies in the parking numbers have been corrected in the final GMP/EIS.

COMMENTS

Richard Wilt
Page 4

some other minor site improvements, the existing facilities would remain intact and not be expanded. The existing parking shortfall would not be addressed.

Alternative 2:

Alternative 2 would result in the clearing of 7.49 acres of forested areas, the addition of 18.25 acres of new paved parking areas, the paving of roughly 10 acres of existing gravel/broken pavement parking lots, and the establishment of a remote parking lot with shuttle (perhaps at the National Wildlife Federation property on Leesburg Pike). Page 101 of the EIS states: "The impacts on water resources described in alternative 1 would be applicable to proposed actions for this alternative." The rationale for this statement is unclear. While it is recognized that there would no longer be any concerns regarding soil compaction and erosion from grass parking areas, it should also be recognized that, of the four alternatives presented, this alternative will result in the greatest amount of impervious cover and will therefore result in the greatest volumes of stormwater runoff. The EIS generally acknowledges that "this alternative would likely increase peak flood levels and their associated discharge rates, which could have downstream implications for the predicted flood periodicity and extent."

4

In addition to potential stormwater runoff impacts, the extensive paving that would be associated with Alternative 2 would have a substantial adverse impact on the visual character of Wolf Trap. We question whether this alternative is consistent with the management objective to "preserve the country atmosphere of Wolf Trap Farm Park . . ." Further, the EIS notes that Alternative 2 would not completely resolve the parking shortfall for sold-out performances. Rather, this alternative would only result in a net increase of either 176 (page 99) or 270 (page 28) parking spaces as compared with Alternative 1. Alternative 2 would, therefore, not completely resolve the parking shortfall for sold-out performances. We question whether the 176 or 270 space increase is worth the adverse impact associated with this alternative (in terms of stormwater runoff, visual impacts, EQC impacts, and RPA impacts) and therefore recommend that this alternative be removed from further consideration.

5

With respect to the possibility of establishing a remote parking area with shuttle service, the EIS should note that the underlying zoning of a property on which the parking area will be pursued may not allow for such a use without approval from the Fairfax County Board of Supervisors. For example, the National Wildlife Federation site is zoned R-1, and facilities on this site have been established through the approval by the Board of Supervisors of a Special Exception. It is possible that the use of the parking lot on this site by Wolf Trap may need similar approval. If this or any other off-site parking area will be considered for use as a remote lot for Wolf Trap, the Zoning Permit Review Branch of the Office of Comprehensive Planning (222-1082) should be contacted for zoning information.

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RESPONSES

4. Although there are adverse impacts, alternative 2 provides a valuable illustration of the application of standard parking requirements for comparison to other alternatives presented.
5. The proper approvals would be pursued if use of this site as a remote shuttle location is selected.

COMMENTS

Richard Wilt
Page 5

Alternative 3:

Alternative 3 would concentrate most of the on-site parking within a new parking garage to be constructed within the general footprint of the existing West parking lot. This alternative would address the existing parking shortfall on-site while providing for restoration/landscaping of existing grass parking areas to the east of Trap Road. This alternative would greatly improve the visual character of the area to the east of Trap Road (and could also provide for greater infiltration of stormwater). This alternative would also have an adverse impact on the visual character of the park and could result in a very urban-looking parking garage to the west of Trap Road that would be out of character with the "country atmosphere" of Wolf Trap.

6

One issue regarding Alternative 3 (as well as other alternatives) that is not addressed by the EIS is the potential for post-performance traffic congestion. This is of particular concern for Alternative 3 because of the proposed concentration of parking in one area. How long will it take for traffic in the garage to exit this facility? If queues to leave the parking garage are too lengthy, might patrons choose to avoid using the garage in favor of parking in communities adjacent to Wolf Trap? We are concerned that, by attempting to solve a parking shortfall by constructing a parking garage, there may be a disincentive created for on-site parking that may actually aggravate existing problems. Further, long queues in the parking garage may result in higher emissions of air pollutants, as opposed to the air quality improvements suggested on page 108.

7

The EIS does not indicate how long it will take to construct the parking garage. Could the garage be constructed between performance seasons? If not, what would be the temporary impacts associated with the loss of parking in the West parking lot?

8

Wolf Trap should coordinate with the Virginia Department of Transportation (VDOT) and the Fairfax County Office of Transportation to ensure that the proposed access ramps to and from the parking structure are located and designed appropriately. In particular, VDOT and the Office of Transportation should be consulted about the possible ramp to the Dulles Toll Road to ensure that this ramp will be consistent with other potential improvements/facilities within this corridor.

Alternative 4:

9

Alternative 4, the proposed action, would result in the clearing of three acres of a forested area for the expansion of an existing grass parking area on Gil's Hill. While this alternative would address the existing parking shortfall, it would further impact the "country atmosphere" of Wolf Trap through the replacement of three acres of woodland with three acres of additional parking (and impact water resources and ecological resources accordingly). As noted earlier, this alternative could also result in minor encroachments into the RPA and EQC of Wolftrap Run

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RESPONSES

6. Post-performance congestion is created chiefly by a bottleneck at the Trap Road bridge where only a single southbound lane of Trap Road bridge and a single lane ramp serve access to the Dulles Toll Road. The proposed parking structure included in alternative 3 would be designed with multiple exits that would connect directly to Trap Road. It would also incorporate an exit ramp from the top level of the structure directly leading to the Dulles Toll Road. These provisions would expedite the exit process from the structure. However, the bottleneck that exists at the Trap Road bridge for the 30% of the traffic that exits using the bridge would continue to impede traffic flow as it does today.

It is estimated that post-performance traffic congestion associated with alternative 3 would be less than what now occurs (alternative 1) because of elimination of patron parking in neighborhoods and dispersed parking on grass areas. The post-performance traffic in alternative 2 is also estimated to be less than alternative 1 because of elimination of patron parking in neighborhoods and the use of shuttle buses from a remote site. Overall post-performance traffic congestion in alternative 4 is estimated to be similar to what occurs in alternative 1, although removing the pedestrians who now compete with cars on the roadway would eliminate a source of concern for safety.

The parking structure would be designed so that exhaust emissions would dissipate quickly.

7. Construction of the parking structure cannot occur during the summer months between May 15 and September 15 in order to eliminate conflicts with performances at the Filene Center. The parking structure is estimated to take less than two years to complete. It is estimated that the construction process would stop during the performance season to minimize the impacts. Phasing could occur in two ways. The foundations could be installed during the first year and the structure constructed the second year. In this scenario, the existing lot could be maintained in the interim.

COMMENTS

Richard Wilt
Page 6

(although the extent of such encroachments is not clear).

10

As noted in the above discussion of Alternative 3, the EIS does not address anticipated traffic congestion after performances. With the provision of additional parking capacity to the east of Trap Road that is proposed under Alternative 4, what is anticipated in terms of post-performance congestion? How long could it potentially take for traffic to exit these lots, and how would this compare with existing conditions? If queues to leave these parking facilities are particularly long, might patrons choose to park in adjacent communities rather than on-site? The EIS does not address this issue, and therefore it is difficult to gauge the effectiveness of any of the build alternatives at addressing the parking shortfall. The EIS seems to imply that if on-site parking capacity is provided, it will be used. Would this necessarily be true if post-performance congestion will increase?

11

The EIS presents Alternative 4 as the preferred alternative but does not discuss why this alternative has been chosen above the others. What environmental parameters did the Park Service consider to be particularly important in its evaluations? What were the key factors behind the determination to support Alternative 4?

A Rail Station Alternative:

12

As noted previously, the EIS identifies, and rejects, a rail station alternative involving a combination of a remote parking area with a shuttle and a new rail stop at Wolf Trap. The EIS estimates that "only about 10% or 700 patrons" would use the rail stop, and that this usage would not justify the estimated \$15 million cost. However, the EIS also indicates that the use of this rail stop could remove 340 cars, which is well over half of the identified parking shortfall. In combination with the 350 cars that would be removed through the provision of remote parking and shuttle (apparently from the parking lot at the National Wildlife Federation), this alternative would appear to address the existing parking shortfall without the need for any additional on-site parking facilities (and therefore without the need for any of the visual or other environmental impacts associated with the construction that would be needed for Alternatives 2, 3, or 4). Further, the cost of this alternative would appear to be somewhat higher than the costs for Alternatives 2 and 4 but much lower than the cost for Alternative 3. We recognize that there are significant problems associated with this alternative (most notably the fact that there will be no rail service along the Dulles Toll Road for at least several years and possibly longer), but we question why this idea has been rejected and has not been presented and examined as an Alternative 5.

With respect to the idea of using a remote parking lot with a shuttle service (at the National Wildlife Federation), the EIS identifies a number of potential problems with this approach (pages 31 and 32). In addition to these potential problems, we question whether the estimated time of

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RESPONSES

A second option would be to construct the foundation level and the first deck level the first year and made available for parking. The second season the next two levels would be added to the structure to complete the project. The parking structure was presented as a concept only. Because it has not yet been designed, specifics regarding construction phasing are not available.

8. The National Park Service would consult with the Virginia Department of Transportation and Fairfax County in designing the proposed access ramp.
9. Except during performances, the appearance of the hill would not vary significantly from the views today. The treeline would be relocated to the east in much the same alignment it follows today. All trees to be removed lie below the crest of the hill.
10. The post-performance traffic exit patterns in alternative 4 would be similar to what occurs under current conditions. It may take a longer time period to empty all of the parking lots east of Trap Road but less time for all patrons to reach their destinations since the long walk to cars parked in the neighborhoods would be eliminated. It is believed that most patrons park in the neighborhoods because they could not find parking onsite. Therefore, it is believed that by providing adequate onsite parking the potential for offsite parking would be minimized.
11. The selection of a preferred alternative does not constitute a decision. The environmental impact statement is an analysis document, not a decision document; it sets forth the full range of feasible alternatives and the implications of those alternatives. A preferred alternative is indicated based on the preliminary analysis of relative effectiveness in meeting the need, degree of environmental impacts, and cost. The final decision and the justification for it will take into consideration the results of public comment and the analysis of the environmental impact statement. The decision document is the "Record of Decision," which may be signed after a

COMMENTS

Richard Wilt
Page 7

13

return to the shuttle lot upon the finish of sold-out performances (estimated at 20 minutes to one hour) may serve as a disincentive to the use of this lot. People who arrive late may be more likely to continue to park in the communities adjacent to Wolf Trap, as the walk from these areas may not take that much more time than the drive to the remote lot and the ride to Wolf Trap via the shuttle, and as the potential post-performance delay would not be as great. We note, however, the encouraging results of the 1994 survey of patron opinions (as noted on page 86, more than half of the patrons surveyed said they would be likely to use a shuttle system if provided) and feel that this survey should not be discounted. Along these lines, the EIS does not

14

discuss the potential (or lack of potential) for the use of the parking lot at The Barns at Wolf Trap. Does the use of The Barns (for performances and for rentals) preclude the use of all or part of its parking lot as a remote site for Filene Center performances? If not, could the use of this lot, along with improvements to pedestrian access between this lot and the Filene Center, be incorporated into a hybrid alternative?

The concept of establishing a remote parking lot with shuttle service may be worthy of further consideration, either as part of a rail station alternative or as a traffic mitigation measure that could be pursued under another alternative. As noted earlier, however, approval may be needed from the Fairfax County Board of Supervisors for the use of an off-site lot for the purposes of remote parking. While County staff recommends that this idea be explored further, our endorsement of such further study should not be interpreted as a commitment on the part of the County to approve a zoning application should this idea be pursued on either of the sites discussed above or on one or more alternative sites.

Other Comments

15

- As noted previously, there is a general lack of consideration of the post-performance traffic congestion issue within the EIS. Would existing post-performance traffic congestion be aggravated by any of the alternatives? Would any of the alternatives improve traffic flow? It is difficult to assess the merits of the various alternatives without such a discussion.

16

- In several places, the EIS states that Fairfax County exceeds the National Ambient Air Quality Standards for carbon monoxide. This statement is incorrect; the County is in attainment of Carbon monoxide standards. The EIS should be corrected accordingly.

17

- Alternatives 1 and 4 would continue to rely on extensive grass parking areas. While it is recognized that applications of fertilizers and pesticides will, on occasion, be necessary to ensure the viability of these areas, it is recommended that such applications be minimized. The EIS references the application of integrated pest management techniques; these techniques should be applied for all grass parking areas.

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RESPONSES

30-day period has expired after the release of the final supplemental environmental impact statement.

12. See response 1 to the Commonwealth of Virginia, Department of Transportation, letter.

13. Due to congestion on Trap Road, long exit times on the shuttle bus after performances would discourage shuttle system use.

14. The parking area at The Barns can accommodate 120 cars. It is not available for use because of conflicting activities scheduled at The Barns during the summer months.

15. It is estimated that the post-performance traffic congestion levels of the other alternatives on Trap Road would be similar to the conditions in alternative 1. This is mainly created by two lanes of southbound traffic exiting the Filene Center after performances being forced to merge to one lane over Trap Road Bridge. After the traffic is over the bridge, it has to turn left to the access ramp to the Toll Road, which is also one lane. Traffic turning left on the ramp must face oncoming traffic from the south on Trap Road. This condition will continue unless there are capacity improvements made to the existing bridge managed by the Virginia Department of Transportation.

The alternative that might reduce this congestion slightly is alternative 3. More exits to the public roadway system would be provided in alternative 3, pedestrians would not be in conflict with exiting vehicles, and the time it takes to walk to the site of the parking structure would disperse the patrons and their exit times slightly better than in the other scenarios. However, the bottleneck at the Trap Road bridge would continue to impede the flow as it does under current conditions. It may also block exits from the parking structure.

16. Changes have been made to the plan to correct this error.

COMMENTS

Richard Wilt
Page 8

18

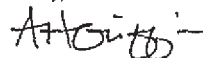
- The EIS does not address whether there may be existing grass areas that could be suitable for overflow parking (as an alternative to the clearing of three acres of trees for the preferred alternative). Do any such areas exist? Could overflow parking be addressed through the use of such areas?

19

- For grass parking areas that are or could be particularly susceptible to erosion or other maintenance problems, could the provision of "grass-crete" or other stabilized surfaces serve to reduce such problems while retaining the pervious, vegetated character of these areas?

Thank you for providing us with a copy of the EIS and for your consideration of our comments. If you have any questions about our comments, feel free to contact Noel Kaplan at 324-1210.

Sincerely,



Anthony H. Griffin
Acting County Executive

AHG:NHK

Attachments: As Stated

cc (without attachments):

Katherine K. Hanley, Chairman, Fairfax County Board of Supervisors
Stuart Mendelsohn, Supervisor, Dranesville District
Robert B. Dix, Jr., Supervisor, Hunter Mill District
James P. Zook, Director, Office of Comprehensive Planning
Shiva K. Pant, Director, Office of Transportation
James A. Heberlein, Director, Fairfax County Park Authority

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RESPONSES

17. The National Park Service has strict guidelines on the use of chemical pesticides that would apply to Wolf Trap. Additionally, language directing the park to emphasize nonchemical turf management techniques has been added to the plan.
18. Vehicles are currently allowed to park on the grass in all areas of the park where natural resources will tolerate the use. The only grass area not being used for parking is the meadow. Parking in the meadow cannot be permitted because a large portion of it lies in the floodplain, patrons use it for pre-performance picnicking, and it is an important element to the country character of Wolf Trap.
19. The National Park Service concurs. A variety of turf stabilizing methods are being considered by the park.

COMMENTS

RESPONSES

MAR 17 '97 04:39PM S B D C

Shouse Village Community Association

P.1

Gloria Harris, President

Received DSCPM

MAR 24 1997

March 17, 1997

By Facsimile (703-255-1971): Copy by Mail

Mr. Richard A. Wilt
Director, National Park Service
Wolf Trap Farm Park for the Performing Arts
1551 Trap Road
Vienna, VA 22182

Re: Draft General Management Plan/Development Concept Plan/
Environmental Impact Statement for Wolf Trap Farm Park

Dear Mr. Wilt:

This letter is to comment on behalf of the Shouse Village Community Association ("SVCA") on the January, 1997 Draft General Management Plan/ Development Concept Plan/ Environmental Impact Statement for Wolf Trap Farm Park ("Draft Plan").

First of all, I want to thank you for taking the time to brief me and the other area residents who attended the public meeting on the Draft Plan in February. We appreciate the efforts of the National Park Service ("Service") and the Wolf Trap Foundation to address the concerns of their neighbors in Shouse Village and other local communities.

The Draft Plan states that between 1994 and 1996, Wolf Trap was sold out between 14 and 26 times per year, and that there are an average of 10 additional shows per year which result in "near sellout" crowds. (P. 13). The Park, according to the Plan, can accommodate all but 500 of the vehicles that are typically driven to sold out performances. (P. 13). Much of the overflow parking is in Shouse Village, causing burden and inconvenience to its residents, and is a source of concern to the SVCA.

With respect to the issue of overflow parking, however, the SVCA does not currently support all aspects of the Alternative #4, which the Service has proposed to implement. Specifically we are opposed to two aspects of alternative #4: (1) the elimination of three acres of trees and the grading of Gil's Hill in order to expand parking space at the Park; and (2) the proposal in Alternative #4 to eliminate parking that currently exists at certain locations. This approach is contradictory and would seemingly cause greater adverse impact on the environment than necessary.

As we discuss more fully below, we urge the Service to

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COMMENTS

RESPONSES

MFR 17 '97 04:48PM S D D C

P.2

Mr. Richard A. Wilt
March 17, 1997
Page 2

retain the existing parking locations, implement certain features of Alternative #4 that would expand parking (with the exception of the proposed elimination of the three acres of trees), and consider other arrangements to address the overflow parking situation, such as the use of shuttle buses for Wolf Trap employees and volunteers for those sold out or nearly sold out performances.

I must confess that our decision to oppose the reduction of the three acres of trees comes as somewhat of a surprise to me; as you know, at the February meeting, I had expressed my preliminary approval for removing the trees. Subsequently, however, the SVCA took an informal survey of residents at the locations that are most affected by overflow Wolf Trap parking: the intersection of Trombone and Sibelius, Schubert Court, and Towleston Road (numbers 1431 to 1451). A vast majority of the residents surveyed were of the opinion that, although the overflow parking is inconvenient (and occasionally highly disruptive), it does not justify the extreme measure of cutting down three acres of trees and grading the hill, particularly at a location that would be visible from Trap Road.

Based upon the statistics set forth in the Draft Plan, cutting down the three acres of trees does not appear to be necessary to reduce substantially the 500 excess cars that the Park cannot currently accommodate at sold out and nearly sold out performances. Instead, the Service could do the following:

(1) as proposed in Alternative #4, fill in the Dust Bowl and Dimple (as identified in the Draft Plan), which would add an additional 214 parking spaces. (Draft Plan P. 56).

(2) Retain the following, currently existing parking locations which would be deleted under Alternative #4:

Tunnel mass parking	38 spaces
Marquee parking	23 spaces
Associates lawn parking	45 spaces
Parking lot #3	30 spaces

Total 136 spaces

(3) Consider limited use of shuttle buses for Wolf Trap employees and volunteers on those 24 to 35 performances of the year that are sold out or nearly sold out to address the remaining 150 cars (of the 500 cars that Wolf Trap cannot accommodate at overflow performances).

With respect to the use of shuttle buses, the Draft Plan notes that the National Wildlife Federation on Route 7 would be willing to allow Wolf Trap parking in its parking lot, which could accommodate 350 cars. (P.32). The Plan and your comments

1. Parking lot #3 would not be removed, but would be merged with other parking and the capacity for the same area increased.
2. The number of employees and volunteers varies according to the types of performance. Their arrival and departure times vary widely; however, the majority of workers leave at the same time as patrons. This makes the scheduling and staffing of shuttle service very difficult.

COMMENTS

RESPONSES

MAR 17 '97 04:40PM S B D C

P.3

Mr. Richard A. Wilt
March 17, 1997
page 3

at the February meeting indicate that the Service rejected the use of shuttle buses for patrons in the belief that the buses would exacerbate traffic problems because they would most likely be used during the congestion that occurs immediately before and after Wolf Trap events. There was also apparently a concern that the patrons that arrived last would be directed to the remote parking site, which would cause them to miss the beginning of shows.

In our opinion, neither of these objections would apply to the use of shuttle buses for employees and volunteers for the limited number of sold out or nearly sold out performances. It is our understanding that employees and volunteers are expected to report to Wolf Trap at least an hour before a show begins. As it would be known at the time they arrived that a show had sold out (or was close to being sold out), they could be directed to park at (1) the Barns (assuming there was no conflicting event scheduled at the Barns); (2) other properties that the Service owns near the Barns; or (3) the Federation parking lot. The buses bringing them into the Park would not compete with the immediate pre-show parking crunch, which generally does not occur until half an hour before the show (Draft Plan P. 80). It is also our understanding that volunteers may leave at intermission, and that most employees leave at least an hour after the conclusion of the show. Again, shuttle buses at either time would not impact the post-show traffic congestion. This solution might not address all 150 cars, but it could largely reduce this number.

In addition, the Service could consider any or all of the following suggestions to reduce the remaining parking overflow:

3

- Provide a financial incentive to patrons arriving early for a show to park at the Federation or Barns parking lot. For example, patrons arriving early who agree to park off-site could receive a coupon for \$5 off at the concession stand or discounts on future Wolf Trap events (especially those shows that do not sell out).
- Similar incentives could be given for Metro riders who show that they took the Metro to arrive at Wolf Trap.

4

- To offset the typical vehicle occupancy of 1 to 2 persons (Draft Plan, P. 80), additional incentives could be given to encourage car pools. In addition to the financial incentives discussed above, vehicles with 4 or more riders could be given preferential parking closer to the Filene Center.

5

- Greater use could be made of the fields behind the Filene Center for parking. Possibly an access road could be built on the North Side of the Filene Center to allow greater access to this location (presumably

3. The use of financial incentives to encourage patrons to use remote parking facilities and shuttle bus or metrobus was considered. It was estimated that most patrons would not be willing to exchange the convenience of parking onsite for a reduction in the price of a ticket or for free food or drink coupons. The lengthy departure time required would be especially difficult to overcome in persuading people to use such a system.
4. See response 4 to the National Capital Planning Commission letter.
5. See response 18 to the Fairfax County letter.

COMMENTS

RESPONSES

MAR 17 '97 04:41PM 5 B D C

P.4

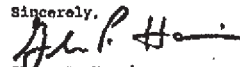
Mr. Richard A. Milt
March 17, 1997
Page 4

that would not interfere with Dinner Tent dining).

In short, there appear to be a number of alternatives that the Service could consider without taking the relatively drastic step of clearing three acres of trees to increase on-site parking. The SVCA requests the Service to consider the above recommendations as an alternative to its current proposal. As the steward for all National Parks, and under the National Environmental Policy Act, we believe the Service has the moral and statutory obligation to consider any reasonable alternative that imposes a less adverse impact upon the environment. Moreover, use of shuttle buses and some of the other proposals discussed above could occur this year and have an immediate positive impact on the parking problem rather than waiting the several years (or more) that would apparently be necessary to resolve the budgetary and construction issues for the more long-term proposals set forth in the Draft Plan.

Thank you for the opportunity to comment. Please feel free to call me if you have any questions or comments.

Sincerely,



Glenn P. Harris
President, Shouse Village
Community Association

COMMENTS

RESPONSES



Director
Wolf Trap Farm Park for the Performing Arts
1551 Trap Road
Vienna, VA 11182

March 20, 1997

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In an attempt to offer constructive input rather than rant and rave over tree cutting which is a non-acceptable option to the environmental community, there are two scenarios not explored. Scenario one examines the incentive structure for mass transit versus individual transportation assuming the individual has a choice between the two.

Mass transit

Costs:

parking at metro
Metro ticket to shuttle bus
Shuttle bus ticket
Fairly high hassle with three transport changes and waiting

Benefits:

no parking hassle

Individual Transport

Costs:

Parking hassle

Benefits:

no direct cost
no changes

It appears that the financial incentives are reverse of what they need to be to promote mass transit. To change the situation there are two options

1

1. Subsidize mass transit

Requires financing
requires personnel
has admin cost

Fairfax ReLeaf, Inc. 12055 Government Center Parkway, Fairfax, VA 22035 (703)324-1409

1. The Wolf Trap Foundation currently subsidizes the cost of providing a metrobus option to patrons who come to Wolf Trap. The current subsidy is \$40,000 annually. Additionally, performance publicity and programming publications promote the use of metrobus to the park.

COMMENTS

2

2. Charge for parking

potential revenue producer
requires personnel
has admin cost

My recommendation would be to contract the parking and charge equivalent to the cash cost for the average mass transit rider. This would wipe out the personal transport financial advantage and balance the social advantage as both methods have some patron hassle. Personnel requirements would be minimal. Admin would be more than present system but this would be your cost for solving the problem.

The other economic point, assuming the first scenario is not acceptable is to balance supply and demand. Your capacity is determined by the available parking not the number of seats in Filene Center. If you were private sector you would be in trouble for trying to sell more than you can produce. Your resource base is fixed you can't produce any more parking. The only option is to tear out seats or limit tickets to your parking capacity rather than exceeding your carrying capacity as is the present policy.

I realize that this is a very simplistic back of the envelope analysis but I hope it might offer other options to the loss of more mature natural forest in Fairfax County.

If Fairfax ReLeaf or myself can be of any assistance please call on us.

Sincerely



Ed Karch
Natural Resource Economist
Executive Director Fairfax ReLeaf

RESPONSES

2. It has been estimated that charges for parking would not provide a disincentive for parking onsite. It would produce revenues. However, the collection methods would have to be attachments to ticket sales. Collection at the entrance would slow the parking lot loading process prohibitively. The increase in ticket prices has been resisted in order to retain competitive ticket prices.

COMMENTS

RESPONSES



DRANESVILLE ENVIRONMENTAL GROUP
6824 Deer Spring Court
Falls Church, Virginia 22043
(703) 533-3837
"Advocates for Responsible Growth"



Received DSC-PM
MAR 24 1997

March 18, 1997

Director
Wolf Trap Farm Park for the Performing Arts
1551 Trap Road
Vienna, VA 22182

Subject: New Parking Lots

Dear Sir,

I am writing to express my concern that Wolf Trap may construct an additional three acres of parking lots with accompanying cutting of forest land. This is absolutely the wrong thing to do in light of available alternatives.

1

For example, Wolf Trap could encourage patrons to use public transportation through an advertising campaign. With the money saved by not constructing additional parking, Wolf Trap could even afford to subsidize bus tickets to the Park.

I have personally taken the bus from the West Falls Church Metro to the Park and found it a delightful and expeditious experience.

Certainly, the environmental community would consider a boycott and picketing of Wolf Trap if this parking lot is constructed.

Sincerely yours,

Kenneth A. Bawer, President
Dranesville Environmental Group

(wolftrap1.lwp)

ROUTE - DENVER SERVICE CENTER	
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1. See response 1 to the Commonwealth of Virginia, Department of Transportation, letter; response 3 to the Shouse Village Community Association letter; and response 1 to the Fairfax ReLeaf letter.

COMMENTS

RESPONSES

RECEIVED
3/4/97

Uwe F. Dyer

March 3, 1997

Director
Wolf Trap Farm Park for the Performing Arts
1551 Trap Road
Vienna, VA 22182

Dear Sir:

This is in reference to your Draft Development Concept Plan (no date) for the considerable expansion of parking and "lawn-seat" capacity at the park (Alternate 4).

To begin with, the public meetings were very poorly advertised and were held on February 13, 1997, instead of February 15, 1997, as advertised in the Gazette. The correction was in the February 13 edition and reached everybody after it was all over. I was not notified, not the Wolf Trap Woods Homes Association, Inc., your direct neighbor, in spite of all the letters I had written. On Page 126 of your plan you claim to have sent copies thereof to the above association which is incorrect; even the name you list. I obtained my copy from the Park Ranger on February 15, when I attempted to attend the meeting.

My main concern in your plan is NOISE emanating from the park and that is not the effect of noise on opossums and muskrats, but the effect of noise made by performers with their mega-sound systems, on real people, like the residents of Wolf Den which is also the subject of my letters I had written everybody including the Secretary of the Interior. In his letter of December 30, 1993, your Director Joseph M. Lawler wrote to me: "Your comments will be considered by the National Park Service in its preparation of the General Management Plan for Wolf Trap", but on Page 15 of your plan it says exactly the opposite, i.e. that nothing was studied and "is beyond the scope of this plan". Also, the technical explanations on Pages 68 and 69 are invalid and utterly misleading as the measurements were taken at the lowest elevations possible, were the sound levels are the lowest. The fact remains that on many nights the "music" and shouting at Wolf Trap can be heard until 11 PM (earlier until 11:45PM):

- (1) on Route 7 Leesburg Pike, in spite of the traffic noise there; and
 - (2) inside my living and bedroom with the air-conditioner running and the television on;
- and that is totally grotesque, absurd and totally "incompatible"; the term you use on Page 69 of your plan. Furthermore, your vague intentions to "strive to meet applicable noise regulations" (Page 15) with "penalties" (?) against those performers who violate them doesn't do anything for the constitutional rights of your neighbors, especially not post-facto.

1. Noise generated by performers is regulated by contracts that the performers sign with the Wolf Trap Foundation. Every effort is being made to ensure adherence to the agreements. Noise generated by audiences is less easy to modify. The park will examine ways to help mitigate noise in designing the new plaza area, especially where noise reflection can be reduced through structure modifications.

COMMENTS

RESPONSES

- 2 -

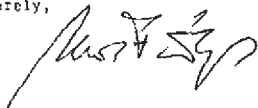
If one can hear the sounds at these locations then people sitting in the first 30 rows inside the theater must have their eardrums blown clear out of the park ! The Surgeon General has determined long ago that such sound levels are detrimental to the public health and, therefore, should not be allowed on Federal property.

In short, you propose to ask Congress for \$13,406,300 to increase seating and parking capacity without giving one iota of consideration towards the noise effects on your neighbors. There is also the problem of what constitutes a "lawn seat" and how much space is allocated to each seat. The fact is that Wolf Trap has oversold the limited capacity for years because there is no definition for a "lawn seat" and its space allowance. Under Alternate 4 of the plan, or any other alternate, Wolf Trap would still oversell and none of the problems would be solved. We should also remember that, when the theater was built in the late 60's modern mega-sound systems of today's rock-"concerts" did not exist and all through the seventys and eightys we never had any noise problems. After the devastating fire of 1982 (due to poor house-keeping) the theater was rebuilt with much greater sound capacity and louder speaker systems. Added to that are huge sound-systems performers install themselves for a particular "concert".

The U.S. Taxpayer had to pay Millions of Dollars for huge concrete walls to protect the theater against traffic noise of the Dulles Toll Road on two separate occasions and rebuilt the entire theater, but not one single penny was spent to protect the residential neighborhoods such as Wolf Den and Wolf Trap Woods, inspite of the fact that we gave Wolf Trap Farm Park the right-of-way to build a water-main right through our park land which cost us many beautiful trees.

In conclusion, I shall ask Congress to declare your proposal as "D.O.A.", (Dead on Arrival) as it gives more consideration to cuckoos and vultures, than your human neighbors (Page 148). In short, the noise can be eliminated without spending millions of dollars by simply TURNING DOWN THE VOLUME. If that is not possible, the 13 Millions should be spent to totally enclose the theater with concrete walls, or close the theater for good. Once the building is surrounded by 4 walls you can make all the noise you want - INSIDE the building.

Sincerely,



Copies to Members of Congress

COMMENTS

RESPONSES

Camille S. Klein

February 24, 1997

Richard Wilt, Director
Wolf Trap Farm Park
1551 Trap Road
Vienna, VA 22182

Dear Mr. Wilt,

First, let me thank you for providing the opportunity for neighbors of the Park to be given information regarding your plans. In the future, community participation might be improved by more publicity regarding such event. If possible, I would recommend contacting the Fairfax County Office of Public Affairs (703 324-3187) to ask that an item be included in their "Weekly Agenda" publication.

I would also like to request that copies of this plan and all future elaboration's of such plans be provided to the Northern VA Soil & Water Conservation Office c/o Bob Kohnke 12055 Government Center Parkway, Suite 905 Fairfax VA 22035 and to the Fairfax Co. Department of Environmental Management Erosion & Sedimentation Control branch c/o Walter Hamilton 12055 Government Center Parkway, Fairfax VA 22035. This should not be interpreted as a lack of confidence in the work or ability of the National Park Service staff, however at the risk of sounding parochial, Fairfax County also employs some highly qualified personnel, who are knowledgeable about this particular area, including other nearby development plans. Ample precedents have been set by the Federal government in coordinating development projects at Ft. Belvoir with our County. I also believe that broader review and comment can only improve the plan.

Clearly, the Park needs to alleviate the parking problems and relieve overflow parking in nearby neighborhoods. There are two ways to do this: one is by increasing the number of parking spaces and the second is by limiting ticket sales.

I deeply regret your decision to clear three acres of upland hardwoods in the area known as Gil's hill, north of the Filene Center. Although I had to leave the meeting a bit early, it was not clear to me that the fiscal impacts of selling 700 to 1000 fewer tickets to each performance to eliminate parking problems had been adequately explored. Increasing the cost of the remaining 6000 tickets by approximately 15% could make up the difference in revenue. The explanation for rejecting this alternative, that "the fiscal integrity of the operation of ... Wolf Trap ... is dependent on ticket sales at that level", is simply not compelling.

Alternatively, further consideration might be given to the construction of a two story parking structure with a footprint no larger than the existing west parking lot. The concept plan noted that construction of a four story structure with a larger footprint was rejected, however a lower structure with a smaller footprint in combination with maintaining all existing parking

1. The possibility of selling fewer tickets to Wolf Trap performances was considered but rejected as a viable option for reducing traffic and parking problems. The Wolf Trap Foundation indicated that the number of tickets sold must remain at 7,000 in order to attract the popular musical groups and performers. The foundation also has indicated that the ticket prices must remain competitive with the other performing arts venues in the area. An increase in the ticket price would result in a drop in performance attendance and therefore a drop in revenue. Without adequate revenue high quality performances could not be maintained at Wolf Trap.
2. The four-level parking structure considered in alternative 3 was sized so that parking on the grass would no longer be necessary. A two-story parking structure on the site of the west parking lot was considered for a possible solution to the parking needs. A two-story structure could hold about 1,400 vehicles, which is 500 spaces more than the 900 that currently park in the west lot. The structure would not eliminate the need to park on the grass areas within the park and would not eliminate the traffic congestion problems associated with parking on the grass. The two-story structure was rejected in favor of the larger structure because it was felt that the larger structure more adequately addressed all of the transportation needs of the park.

COMMENTS

2 might serve the Park's needs as well. A smaller structure could allow spaces for an additional 500 to 600 cars in the area of the west lot (that is 1500 rather than the 900 that are currently parked there) at a cost as low as perhaps \$13 to 23 million.

3 Regarding the use of grass pavers for parking areas on Gil's hill and elsewhere in the Park, I believe that it has been the position of Fairfax County Department of Environmental Management that grass pavers clog over time and require too much maintenance to be suitable for intense use like frequent parking. If newer technology obviates this drawback, please share this information with the Fairfax County staff.

4 If paving the parking lot west of Trap Rd. is necessary, please consider the use of some porous pavement for that area to improve permeability.

It was surprising that the cost of a four story parking structure is more than double the cost of a Metro station at Wolf Trap. Based on the information given, calculations suggest that structure parking is estimated to cost approximately \$12,330 per vehicle. This is slightly higher than estimates that I have seen quoted elsewhere. The parking structure is certainly the most environmentally friendly solution. I will contact my Congressman to ask about appropriations for structure parking, although I realize that the chance of success is not good.

Thank you again for an informative presentation.

Very truly yours,

Camille Klein

RESPONSES

3. The comments about the potential maintenance problems associated with grass pavers are noted. A full range of turf stabilizers and pavers will be considered during the design and construction phase of this process to make sure that the optimum technology is selected for use.
4. Porous parking surfaces typically include turf, stabilized turf, and gravel surfaces. When these surfaces are upgraded to paved surfaces, there is a structural need to eliminate or minimize the flow of water through the pavement surface into the subgrade material. Water contamination of the pavement subgrade is a major contributor to reduced pavement life and pavement failure. The advantages of paved parking surfaces must be weighed against the disadvantages of increased stormwater runoff created by the hardened surface. It is not likely that the paved parking areas can be designed to increase permeability.



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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