

National Park Service
U.S. Department of the Interior



Wolf Trap National Park for the Performing Arts
Management Plan Environmental Assessment
Vienna, Virginia



WOLF TRAP NATIONAL PARK FOR THE PERFORMING ARTS MANAGEMENT PLAN

**ENVIRONMENTAL ASSESSMENT
NOVEMBER 2021**

Wolf Trap National Park for the Performing Arts Management Plan / Environmental Assessment

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PURPOSE AND NEED

INTRODUCTION

The National Park Service (NPS), in cooperation with the Wolf Trap Foundation (Foundation), is developing a Management Plan and environmental assessment (Plan) for Wolf Trap National Park for the Performing Arts (Park) in Vienna, Virginia to evaluate improvements that will enhance visitor experience, access, circulation, and expanded amenities. The Park's purpose is to provide opportunities to experience live performances, related educational programs, and associated recreation in a pastoral setting within the National Capital area.

This Plan would amend the Wolf Trap National Park for the Performing Arts 1997 Final General Management Plan (GMP). This Plan considers vehicle and pedestrian circulation, including accessibility and walkway treatments; visitor and patron facilities, including the Main Gate and Filene Center, Stand A and other support facilities; interpretation and education; administration, operations and safety; and other existing features that are retained in the Plan. This follows the NPS "Planning Portfolio" construct, consisting of a compilation of individual plans, studies, and inventories, which together guide park decision making. The planning portfolio enables the use of targeted planning products (such as this one) to meet a broad range of park planning needs, a change from the previous NPS focus on stand-alone general management plans. The general management plan remains a critical piece of the planning framework, however, and will be revised in a timely manner through the park's planning portfolio.

This Environmental Assessment (EA) describes two alternatives for the proposed management of the park, an action alternative and the no-action alternative, and analyzes the environmental consequences of implementing the alternatives. The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA); regulations of the Council on Environmental Quality (40 CFR 1500-1508); NPS Director's Order #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making; and the NPS NEPA Handbook (NPS 2015). In conjunction with this EA, the project is undergoing a review of potential effects on historic resources in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966. This document is being used for compliance with the National Environmental Policy Act (NEPA) of 1969, as amended. A separate Assessment of Effects has been prepared for compliance with the National Historic Preservation Act of 1966, as amended.

Purpose

The purpose of the proposed action is to update the Wolf Trap National Park for the Performing Arts GMP to achieve the following in a manner that protects park resources and retains the park's cultural landscape, outdoor recreation opportunities, and performing arts experiences in an outdoor setting:

- Improve accessibility, safety, and security features to current industry standards wherever possible
- Create amenities expected by visitors, patrons attending events, and artists
- Address long-documented site challenges, such as transportation access, pedestrian circulation, and stormwater management
- Address deferred maintenance areas
- Improve the visitor and patron experience and expand opportunities for year-round park use

Need

An amendment to the Wolf Trap National Park for the Performing Arts GMP is needed to address the following issues:

- The Filene Center has outdated amenities that do not meet current industry standards and/or expectations
- Facilities do not meet accessibility standards
- Facility configuration does not support current security/operational needs
- Visitor experience is diminished due to limited shelter during inclement weather
- Children's Theatre-in-the-Woods area lacks needed support facilities, such as a comfort station, shelter, and an appropriate kiosk
- Amenities, such as food service and restrooms, do not meet current capacity needs or expectations of visitors and patrons
- Patron and visitor queues for arrival and security leave them exposed to the elements

BACKGROUND AND PROJECT AREA

Wolf Trap National Park for the Performing Arts is an approximately 130-acre park, which was donated by Catherine Filene Shouse, a devotee to the performing arts, and authorized by Congress in 1966 to create Wolf Trap Farm Park (original name) in Vienna, Virginia, as the first and only national park for the performing arts. Encroaching roads and suburban development inspired Shouse to preserve this former farm as a park where people could find spiritual nourishment in the peacefulness of nature and enjoyment in the performing arts. Shouse donated land for the park, including five existing buildings, and funds towards building the Filene Center outdoor performing arts complex. On July 1, 1971, the Filene Center opened to the public as a world-class entertainment facility.

The Park is located approximately 18 miles west of Washington, DC, and provides a natural enclave in the midst of an increasingly urbanized northern Virginia and is bordered by VA-267 to the south and residential neighborhoods to the north, east, and west (**Figure 1**). Trap Road, an arterial road maintained by the Virginia Department of Transportation, runs through the park. The park is located on former farmland and today includes three outdoor performance venues, several structures, parking lots, paved roads, mowed lawns, meadows, hiking trails, and approximately 65 acres of woodland, streams, and wetlands.

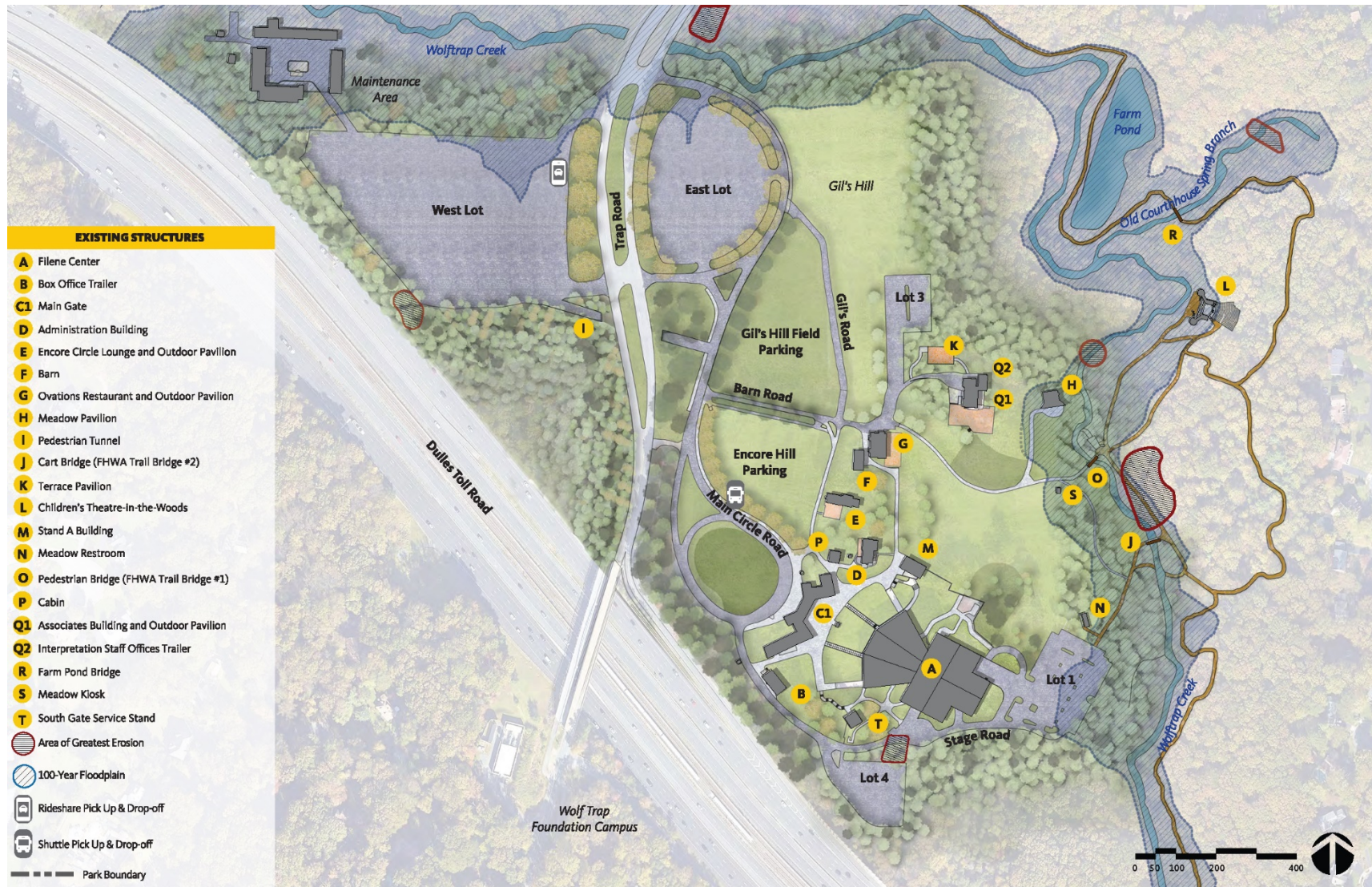
The success of presenting performing arts at Wolf Trap National Park for the Performing Arts is the result of a partnership between a government agency—the National Park Service—and a private organization—the Wolf Trap Foundation for the Performing Arts. The National Park Service oversees park management, sponsors both interpretive and educational programs, and directs operation and maintenance of technical equipment and backstage facilities that serve performing artists. The Wolf Trap Foundation, a private not-for-profit corporation founded at the request of the Department of the Interior, is responsible for artistic programming, public relations, and marketing. Both organizations provide services to visitors that allow for safe and enjoyable experiences at the park. Together the National Park Service and the Wolf Trap Foundation foster the park's unique performing arts experience that is centered on artistic excellence in an outdoor setting.

The approximately 108-acre project area is composed of the west parking lot, Trap Road, and the portion of the park east of Trap Road as shown in **Figure 2**.

Figure 1: Regional Context



Figure 2: Project Area and Existing Conditions



ISSUES AND IMPACT TOPICS RETAINED FOR DETAILED ANALYSIS

The NPS, participating agencies and stakeholders, and the public identified issues and impact topics for detailed analysis during the internal and public scoping processes. These issues and concerns are included in the impact topics that are discussed in the “Affected Environment and Environmental Consequences” section of this Environmental Assessment (EA). The proposed project includes widening Main Circle Road, a new accessible parking area, new accessible connections, a new pedestrian tunnel, walkway treatments, an expanded and enhanced Main Gate plaza, Filene Center improvements, new structures, stormwater management improvements, and other improvements to visitor and patron facilities.

Potential for the project to impact cultural landscapes and historic buildings or structures. The NPS prepared a Cultural Landscape Report (CLR) for the physical landscape associated with the Wolf Trap National Park for the Performing Arts and is preparing a National Register of Historic Places (NRHP) nomination for the park as an historic district; the CLR and historic district’s boundaries include the project area. The CLR identifies contributing spatial organization, circulation, views, vegetation, buildings and structures, and natural systems within the park. The proposed action has the potential to result in impacts on these features as a result of changes to vehicular and pedestrian circulation, visitor and patron facilities, interpretation and education, and administration, operations, and safety. As a result, these cultural resources are analyzed in detail in the Cultural Landscapes section of this EA.

Potential for the project to impact archeological resources. The NPS prepared a Phase IA Archeological Assessment in 2021 in conjunction with the preparation of this EA (Seibel and Regan 2021). The project site includes areas of both precontact and historic archeologic potential. Six archeological sites registered with the VA SHPO are located within the project site, although two have been determined as Not Eligible for listing in the NRHP. The proposed action has the potential to result in impacts on these resources as a result of changes to vehicular and pedestrian circulation, visitor and patron facilities, interpretation and education, and administration, operations, and safety. As a result, archeological resources are analyzed in detail in this EA.

Potential for the project to impact visitor use and experience. The proposed project would add new or renovate amenities, improve accessibility, and alter circulation patterns within the project area. The Plan would add walkway treatments to main queue areas, renovate or replace existing structures, and add outdoor pavilions and picnic decks. The Plan would also change vehicular and pedestrian circulation within the project area and access to the Filene Center through a new pedestrian tunnel, a new bypass lane on Main Circle Road, new bus and rideshare loading zones, and new directional/wayfinding signage. The project’s potential impacts on visitor experience, opportunities, and circulation within the project area are analyzed in the detail in the Visitor Use and Experience section of this EA.

ISSUES AND IMPACT TOPICS DISMISSED FROM DETAILED ANALYSIS

Some issues and concerns identified during scoping were considered by the NPS but ultimately dismissed from detailed analysis because they were determined not central to the proposal or not of critical importance. This section will provide brief descriptions of the issues and concerns determined to not warrant further consideration, as well as a summary justification for the dismissal of each issue.

Potential for the project to impact wetlands. Approximately 5.9 acres of the 108-acre project area (5.4 percent) are classified as wetlands according to the U.S. Fish and Wildlife Service’s (USFWS) National Wetlands Inventory. Additionally, a wetlands delineation for likely areas of disturbance within the project area identified seven riverine and three palustrine wetlands (AECOM 2021). Wetlands are located throughout the project area along the park’s creeks and their tributaries and include freshwater pond, riverine, and freshwater forested/shrub wetlands.

The proposed project would realign sections of existing trails currently within wetlands; convert existing trails in wetlands to accessible foot trails; replace two bridges; and stabilize streambanks. The NPS would adhere to procedures set forth in *Procedural Manual #77-1: Wetland Protection* in order to comply with NPS Director's Order (D.O.) #77-1: Wetland Protection and to avoid, minimize, and compensate for adverse impacts on wetlands. *Procedural Manual #77-1* defines the actions listed below, which include elements of the proposed project that may be excepted actions from the Statement of Findings requirements and compensation requirements described in the manual as long as specific conditions and Best Management Practices (BMPs) are satisfied. The NPS would adhere to the following conditions and BMPs identified in *Procedural Manual #77-1* in the development of trail crossings of wetlands:

- Wetland impacts from fill placement as a result of scenic overlooks and foot/bike trails or boardwalks (including signs), where primary purposes include public education, interpretation, or enjoyment of wetland resources, would be 0.1 acre or less (parking lots, access roads, borrow sites, and other associated facilities cannot be excepted.)
- Minor stream crossings would use bridges or other structures that completely span the channel and associated wetland habitat (i.e., no pilings, fill, or other support structures in the wetland/stream habitat).
- Actions designed to restore degraded (or completely lost) wetland, stream, riparian, or other aquatic habitats or ecological processes. For this exception, "restoration" refers to reestablishing environments in which natural ecological processes can, to the extent practicable, function as they did prior to disturbance.

The 0.1 acreage limit applies to "single and complete projects" located on discrete sites that also have "independent utility" (i.e., are fully functional units by themselves). Riverine wetland crossings associated with new trails and converted existing trails would be constructed to span the full channel width from uplands to uplands, thereby avoiding impacts to riverine wetlands. Realigned sections of existing trails would also be realigned away from wetlands to the extent feasible or would install boardwalks and bridges completely spanning the channel, in accordance with *Procedural Manual #77-1*. The streambank stabilization would also not result in wetland impacts greater than 0.1 acres.

The NPS would also adhere to Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act of 1899, obtain all necessary federal and state permits for proposed project actions occurring in wetlands, and adhere to applicable requirements set forth in the permits. The proposed project would also be conducted in accordance with the Chesapeake Bay Preservation Area Designation and Management Regulations. Adherence to the requirements of *Procedural Manual #77-1* and applicable federal and state permits and regulations would ensure that the proposed project would avoid wetlands and minimize unavoidable wetland impacts to the extent feasible. As a result, this impact topic was dismissed from further consideration in this EA.

Potential for the project to impact floodplains. Approximately 23 percent (25 acres) of the project area is located within the 100-year floodplain. The project area along Wolf Trap Creek, Old Courthouse Spring Branch, and Farm Pond, the maintenance area, and a portion of the east and west parking lots are located within the 100-year floodplain (FEMA 2019).

The proposed project would convert existing trails to accessible trails in the 100-year floodplain northeast of the Filene Center along the east edge of the meadow and near the Meadow Pavilion. The proposed project would also realign sections of the existing trail along Wolftrap Creek with erosion issues and replace one trail bridge currently in the 100-year floodplain. The Meadow Pavilion, should it become substantially damaged by weather or flooding, would be relocated outside the floodplain or built in a way that would avoid adverse impacts on the floodplain. The NPS would adhere to procedures set forth in

Procedural Manual #77-2: Floodplain Management to eliminate or minimize impacts on the 100-year floodplain to the extent possible. *Procedural Manual #77-2* does not apply to certain park functions that are often located near water for the enjoyment of visitors but require little physical development and do not involve overnight occupation, including “foot trails.”

The project would not add structures that could alter flood flows. The NPS would adhere to procedures set forth in *Procedural Manual 77-2: Floodplain Management* to eliminate or minimize impacts on the 100-year floodplain to the extent possible. The project would adhere to the requirements of Executive Order 11988, *Procedural Manual 77-2*, and applicable federal and Virginia permits. Therefore, this topic was dismissed from detailed analysis.

Potential for the project to impact water resources. The park lies within the Potomac River drainage basin and contains two acres of upland forest. The park is part of the Difficult Run Watershed, a tributary of the greater Potomac watershed. Two streams, Courthouse Creek and Wolftrap Creek, meet within the park boundary and flow through the park, eventually draining into Difficult Run. The park's water resources are major contributors to both the scenic value of the park and its biological diversity (Walsh et al 2015). The Hydrologic Evaluation of Wolf Trap National Park for the Performing Arts (Gerenday 2019) identifies multiple concerns related to the two primary streams within the park, including areas leading to the West Lot, from Gil's Hill, adjacent to the Filene Center, along the road to the Children's Theatre-in-the-Woods, and along Wolftrap Creek.

The proposed project would disturb during construction an estimated 9.3 acres of soil, including both areas currently vegetated and paved, within the 108-acre project area due to clearing for new structures, circulation improvements, trails and bridge installations, and parking. Of the approximately 9.3 acres, an estimated 3.1 acres are developed with pavement or structures, 4.3 acres are within areas identified as developed open space, and 1.9 acres are natural areas that would be disturbed as part of streambank stabilization, bridge installation, and trail realignment. Such disturbance and vegetation removal would increase the vulnerability of soil to water and wind erosion and potentially result in the corresponding sedimentation and pollution of downstream watercourses during construction. The proposed project's streambank stabilization of Wolftrap Creek and Old Courthouse Spring Branch would reduce erosion at specific points along these waterways. The NPS and/or its contractors would adhere to applicable BMPs during the construction phases to minimize the erosion of exposed soils and the corresponding pollution and sedimentation of downstream watercourses. Proposed project actions disturbing one acre or more of earth would obtain coverage under Virginia's General Permit for Discharges of Stormwater from Construction Activities, which would require the preparation of a stormwater management plan and an erosion and sediment control plan. Adherence to the requirements of the permit, stormwater management plans, and erosion and sediment control plans would minimize construction-related impacts on water resources. The phasing of the proposed project over a period of up to 20 years could increase long-term sediment load resulting from construction activities for a longer duration but would minimize the potential for an acute one-time impact on water resources.

The proposed project would not increase the volume of stormwater runoff generated at the park through design or the use of BMPs, such as the use of permeable materials, bioswales, and other elements to manage stormwater runoff. New pedestrian routes would be constructed of permeable materials that would facilitate the percolation of stormwater into the ground. New parking and roadway configuration at Main Circle Road and the construction of Stand A and other structures would exceed 5,000 square feet and be paved. As required by the Energy Independence and Security Act of 2007, the new development would be required to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow. The East and West Lots could be repaved using permeable materials or permeable areas could be added as recommended in the Hydrologic Evaluation of Wolf Trap National Park for the Performing Arts. Factors

determining the use of permeable materials include the water table, presence of floodplain, and maintenance requirements. As a result, this topic was dismissed from further analysis in this EA.

Potential for the project to impact vegetation. Approximately half of the park is heavily developed and maintained, with structures, parking lots, paved roads, mowed lawns, and meadows. Much of the existing turf serves as parking areas. The almost one-acre planted and maintained meadow within the Main Circle features native plants and habitat for pollinators (Walsh et al. 2015, Gillen n.d.), including serviceberry, obedient plant, dogbane, and late boneset. Approximately 65 acres, or just a little more than half the park, is a natural forest community. The forest is the oak-hickory forest that is predominant in this area of Virginia. The upland hardwoods consists mainly of dry site species such as red, black, and chestnut oaks, and hickories. Understory plants include dogwood, sassafras, and mountain laurel. Bottomland forests in the wetlands and floodplain include yellow poplar, red maple, river birch, sycamore, and ironwood; with understories of wild azalea, viburnum, and American holly.

The total disturbance of vegetation would be an estimated 6.2 acres, much of which is turf that would be returned to its existing condition once construction completed; trail conversion and realignment and streambank stabilization would disturb an estimated 1.9 acres. The proposed plan would reduce the almost one-acre Main Circle to approximately 0.7 acres and replant the area with native meadow vegetation. The NPS would continue to manage the Main Circle and existing no-mow areas similar to current practices. Further design and implementation of individual plan elements would seek to incorporate meadow and native vegetation, and reduce turf, to the extent practicable. The proposed plan would remove 18,5000 square feet of trees, estimated to be approximately 41 trees, based on the age and type of woods south of the Main Circle. Although wooded, this area of the park is not identified as forest in the Natural Resources Condition Assessment (Walsh et al. 2015). Other areas of potential tree removal as a result of construction would be at located at Stands A and B and along the northern portion of Main Circle Road. The NPS and Foundation would plant an estimated 18,500 square feet of trees as replacement for the trees removed, consistent with National Capital Planning Commission (NCPC) Federal Environmental Element guidance (NCPC 2020). Replacement trees would be native and compatible with the vegetated community of the affected area. Prior to design and construction, the NPS and Foundation would conduct a tree survey, which would record trees four inches or greater in dbh. An estimated 1.3 acres of turf would be disturbed in order to expand picnic areas, although some would be replaced. New tree plantings would occur within the East and West Lots (estimated less than one acre).

No buildings would be constructed within forest communities. Disturbance in these areas would occur as part of trail realignment and streambank restoration. New and realigned trail routes would avoid the removal of trees. Due to the shallow depth of the trails (up to six inches) and the avoidance of existing trees, it is not anticipated that the implementation of new and realigned trail routes would result in tree mortality as a result of impacts on critical tree root zones. Prior to construction, a licensed tree expert or certified arborist would evaluate potential specimen trees to ensure avoidance. Trails and other areas exposed during construction would be re-vegetated as forest, turf, or meadow, as compatible with the surrounding conditions, or otherwise stabilized following the completion of construction, which would reduce the potential for invasive species. As a result, this topic was dismissed from further analysis in this EA.

Potential for the project to impact wildlife and wildlife habitat. The park offers habitat for wildlife in a highly urbanized setting. Several dozen mammals inhabit the park on a permanent or intermittent basis, including red fox (*Vulpes vulpes*), gray fox (*Urocyon cinereoargenteus*), woodchuck (*Marmota monax*), northern raccoon (*Procyon lotor*), and numerous rodent and bat species (NPS 2013b). The park contains habitat conducive to reptiles, amphibians, and fish. The park also provides habitat for birds, with both resident and migratory species utilizing its abundance edge habitat and permanent water sources. The meadow area within the Main Circle offers feeding areas for bats and birds. Insect species found within

the park include bee species such as European honeybee (*Apis mellifera*) and common eastern bumble bee (*Bombus impatiens*); butterflies, including monarch butterflies (*Danaus plexippus*); flies, such as the flesh fly (*Sarcophaga spp.*); and beetles, including the sun beetle (*Amara spp.*) and goldenrod soldier beetle (*Chauliognathus pennsylvanicus*) (Gillen n.d.).

The Plan's proposed construction would occur primarily in areas developed or considered developed open space, including an estimated 185000 square feet of edge woods located south of the Main Circle that would be removed, although a remaining wooded corridor would continue to connect the natural forest to wooded areas along the southwest perimeter of the park. The approximately one-acre meadow at the Main Circle would be replaced with a meadow of approximately 0.7 acres at the Main Circle. Further design and implementation of individual plan elements would seek to incorporate meadow and native vegetation, and reduce turf, to the extent practicable. The streambank stabilization and trail realignment would occur in the approximately 1.9 acres of natural landscape.

Construction activities associated with the proposed Plan could have the potential to damage or remove vegetation or other features that provide habitat for common species of animal wildlife or displace or destroy specimens of common animal wildlife species. However, it is anticipated that many of the displaced specimens would relocate to similar areas of habitat, including added meadow and native vegetation on-site, during construction and return to the disturbed areas as construction activities cease and vegetation and other features providing habitat regenerates or are restored. In the long-term, some wildlife species may experience a decline and loss of habitat and some species may experience disruption through the introduction of visitor uses in previously undisturbed areas. NPS biologists or other qualified personnel would develop applicable BMPs to minimize impacts on animal wildlife. The inadvertent destruction of individual specimens of wildlife during construction activities is not anticipated to result in population-level impacts on any particular species. The implementation of the proposed project over a period of up to 20 years would further minimize impacts by concentrating construction activities in smaller areas. However, the 20-year implementation period may also extend and amplify the adverse impacts on wildlife and habitat due to the extended presence of construction material and noise. Overall, in the long term, impacts on common species of wildlife in the park would be minimal. As a result, this topic was dismissed from detailed analysis in this EA.

Potential for the project to impact threatened and endangered species. In accordance with Section 7 of the Endangered Species Act, the NPS consulted with the U.S. Fish and Wildlife Service (USFWS), Virginia Department of Conservation and Recreation (DCR), and Virginia Department of Wildlife Resources (DWR) to determine the potential for, respectively, federally and state-listed protected species to be present at the project area. The USFWS consultation indicated the potential for the federally threatened northern long-eared bat (*Myotis septentrionalis*) to be present at the park. While not known to be present at the park, the project area is considered within the historic range of the federally endangered rusty patched bumble bee (*Bombus affinis*) in Virginia; the species is likely to be present in only 0.1 percent of its historical range (USFWS 2019, 2020).

The Virginia DCR consultation indicated that no natural heritage resources have been documented within the project boundary, the project will not affect any documented state-listed plants or insects, and there are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity. The Virginia DWR consultation indicated no identification of federally- or state-listed protected species within the park. Virginia DWR documented confirmation of one state-listed protected species to be present or likely to occur within a two-mile radius of a point within the park: wood turtle (*Glyptemys insculpta*) (state threatened).

Prior to and during the implementation period of the proposed project, the NPS would continue to consult with the USFWS and the Virginia DCR and DWR to identify activities included in the proposed action that would have the potential to affect federally and state listed threatened and endangered species.

The project would have a tree clearing of less than 15 acres, the level required for additional consultation for the northern long-eared bat. To avoid adverse impacts on the northern long-eared bat, the NPS would incorporate new survey information and adhere to a time-of-year restriction between June 1 and July 31 in any year for the removal of known occupied maternity roost trees or trees within 150 feet of known occupied maternity roost trees, and between April 1 to October 31 of any year for the removal of known roost trees. Further, the NPS would not remove trees within 0.25 mile of a known hibernaculum at any time of year without reinitiating Section 7 consultation with the USFWS.

Wood turtle habitats are located in and along streams within the Chesapeake Bay watershed, in which the park is located. Construction activities would implement best management practices to avoid and minimize sedimentation in waterways (USFWS n.d., USFWS 2019). Stormwater management facilities would be included in the implementation of the Plan. In addition, the NPS would coordinate with Virginia DWR regarding time of year restrictions for the wood turtle prior to streambank restoration activities.

Through ongoing consultation with the USFWS (and the Virginia DCR and DWR as needed), adherence to applicable minimization or mitigation measures identified during the consultation process, and performing tree removal only outside of the active period from November 1 to March 31, it is anticipated that the proposed project would have no adverse impacts on federally or state-listed threatened and endangered species occurring at the park. As a result, threatened and endangered species and wildlife were dismissed from further analysis in this EA.

Potential for the project to impact geology and soils. The proposed project would disturb during construction an estimated 9.3 acres of soil, including an estimated 3.1 acres developed with pavement or structures, within the 108-acre project area due to clearing for new structures, circulation improvements, trail realignments, streambank stabilization, bridge installations, and parking. Regrading would be required as a result of the new Main Circle Road parking and the pedestrian tunnel under Main Circle Road. In all cases, the exact amount of soil removal would be dependent upon the specific design. The Plan's proposed trail realignments and streambank stabilizations would reduce soil erosion. No prime farmland is present within the project site.

During the construction phases, the NPS and/or its contractors would adhere to applicable BMPs to minimize the erosion of exposed soils and the corresponding pollution and sedimentation of downstream watercourses. Construction disturbing one acre more of earth would obtain coverage under Virginia's General Permit for Discharges of Stormwater from Construction Activities, which would require the preparation of a stormwater management plan and an erosion and sediment control plan. Adherence to the requirements of the permit and stormwater management and erosion and sediment control plans would minimize construction-related impacts on soils. The phasing of the proposed project over a period of up to 20 years would further minimize impacts on soils resulting from construction activities because impacts would be confined to a smaller area rather than park-wide, thereby reducing potential for soil exposure to wind and rain, at any one time. As a result, this topic was dismissed from further analysis in this EA.

ALTERNATIVES

This EA analyzes the potential environmental consequences of two alternatives, including an action alternative and a no-action alternative. The elements of these alternatives are described in detail in this chapter. Impacts associated with the actions proposed under each alternative are outlined in the “Affected Environment and Environmental Consequences” chapter of this EA. In addition, several options were dismissed from further consideration. These are described in this chapter under “Alternatives Considered but Dismissed.”

ALTERNATIVE A: NO ACTION

Vehicle and Pedestrian Circulation

Pedestrians would continue to use an at-grade crosswalk on Main Circle Road to access the Filene Center from the pedestrian tunnel under Trap Road and the East Lot. Pedestrians would continue to proceed from the pedestrian tunnel or East Lot along a sidewalk on the west side of Main Circle Road, cross Main Circle Road at the crosswalk, and proceed to the Filene Center Main Gate plaza via a sidewalk on the east side of Main Circle Road. The pedestrian tunnel under Trap Road would be retained.

Main Circle Road would continue to connect East Lot Access Road and the southern vehicle driveway to the park to the Main Gate plaza. Main Circle Road would continue to be a two-lane, two-way roadway west and north of the Encore Hill field parking and Barn Road. To the west and south, Main Circle Road would continue to be a one-way roadway with two traffic lanes forming a loop around the circular, bowl-like, vegetated area. This portion of Main Circle Road is also known as the ‘circle.’

For events at the Filene Center, 16 paved and grass parking areas would continue to provide approximately 2,700 to 2,800 parking spaces. All paved and grass parking areas would be retained, including the following:

- 25 striped, paved, parallel parking spaces along both sides of the eastern portion of the circle
- 13 striped, paved parking spaces on the exterior of the southwestern portion of the circle
- 34 turf parking spaces around the west side of the circle
- Approximately 43 parking spaces in an unmarked triangular grass area north of the circle
- 41 striped Americans with Disabilities Act (ADA)-accessible parking spaces around the circle, and at Lot 1, Lot 3, and Lot 4

Bus parking would continue to be provided at the circle. An informal rideshare and taxi drop-off and pick-up area would continue to be located at a pull-off area on the west side of Trap Road near the southern vehicle driveway to the West Lot.

Main Gate and Filene Center

Pedestrians would continue to queue for entry into the Filene Center via an uncovered sidewalk along the north side of Main Circle Road and the uncovered primary north-south access from Gil’s Hill. The Main Gate would be retained in its current condition as a single-story wood building. The Main Gate would continue to be composed of two rectangular wood-framed buildings with an elevated wood canopy suspended between them. The canopy would continue to cover a series of gates, but would not be able to

fully accommodate and cover security equipment. The Main Gate plaza would also be retained in its current condition. The Dinner Gate would continue to be uncovered.

Food Services Stand A would be retained in its current condition as a two-story, wood-framed concessions building. The upper floor would continue to be at level with the Filene Center plaza and provide single-sided amenities to patrons on the plaza. A wood porch would continue to extend from the upper level on the south side of the building. The lower level would continue to include non-ADA accessible restrooms, accessed from sidewalks at the level of Filene Center's main floor seating. Stairs would continue to connect the two levels.

The Filene Center's interior continental seating arrangement would be retained. Seating would continue to not be compliant with the Architectural Barriers Act Accessibility Standards (ABAAS). The existing audio-visual systems would also be retained.

Backstage amenities at the Filene Center would also be retained in their current condition, including the unfinished rehearsal hall. Public restrooms would continue to be located at the northwestern corner of the backstage area. The main artist patio located on the north side of the backstage area would also remain in its current condition.

Other Retained Features

- The Associates Building Outdoor Pavilion, Interpretation Staff Offices Trailer, Encore Circle Lounge and Outdoor Pavilion, and Ovations Restaurant and Outdoor Pavilion would be retained in their current condition. The Associates Building would remain as a one-story, brick building that has had several additions and alterations over the course of the building's history. The Encore Circle Lounge would remain as a one-story log structure with a flagstone terrace extending from the structure's south side. The Ovations Restaurant would remain as a two-story, wood-framed structure.
- Picnic tables would remain in the West Lot, the top and bottom of the meadow, near the vehicle gate at Lot 4, and around the Barn area. The picnic tables would continue to be located on grass and not meet accessibility requirements. Visitor opportunities to picnic on the meadow hill would also continue.
- The Children's Theatre-in-the-Woods would continue to offer performance space, located away from visitor services. Restrooms and service kiosks would continue to offer items such as refreshments or restrooms located elsewhere on the site, away from the Children's Theatre-in-the-Woods.
- The Meadow Kiosk would be retained as a hexagonal open-sided wood structure. The information kiosk would continue to provide box office operations and artist merchandise sales during Theatre-in-the-Woods performances.
- Directional and wayfinding signage would remain along major walkways and trails to direct pedestrians within the park.
- Visitor inspection would continue to occur prior to visitor entrance at gates. Planters would continue to serve as vehicular barriers to the Main Gate.

ALTERNATIVE B: MANAGEMENT PLAN (NPS PREFERRED)

The proposed Plan would retain the features of the 1997 General Management Plan that are not explicitly mentioned in this Plan. The following outlines the proposed changes included in this Plan that amends the 1997 GMP, including multiple options considered for specific areas, including circulation. See the

Appendix A to review management actions included as part of the 1997 GMP. The proposed changes are shown in **Figure 3** and in Appendix B.

Vehicle and Pedestrian Circulation

Vehicular Circulation

Main Circle Road would be widened from two to three lanes by adding a bypass lane for approximately 800 feet around the Main Circle for vehicles needing to access Lot 4, Lot 1, or the backside of the Filene Center. The circulation would continue one-way counter-clockwise movement. The additional lane would also facilitate access for emergency vehicles. Existing parking around Main Circle Road would be removed. Main Circle Road would be reconfigured to accommodate the expanded Main Gate and plaza, the additional traffic lane, and bus turning movements required to navigate Main Circle Road, while still maintaining the striking view of the Filene Center on the approach. The roadway nearest the Main Gate would be pushed west in order to accommodate the expanded plaza. The one-lane western portion of the circle, connecting the in- and out-bound directions, would be moved east in order to avoid potential conflicts with a parking lot entrance. Combined, these changes to the configuration would shrink the existing circle area from approximately 42,250 square feet to approximately 28,500 square feet.

The existing pick-up and drop-off zone for the Wolf Trap Express Shuttle would remain along Main Circle Road; the Foundation would continue to coordinate with Fairfax County to provide shuttle services to Metrorail stations, including a potential shuttle connection to the Metrorail's Silver Line. A new formalized rideshare drop-off and loading zone would be added to the West Lot through minor restriping to organize the West Lot for parking, drop-off and loading, and pedestrian flow zones. Visitors awaiting rides would queue near the pedestrian tunnel under Trap Road to direct access to performances. Rideshare vehicles would turn from southbound Trap Road and queue along the far east section of West Lot, which would provide a larger, safer and more organized site for rideshare pickup compared to current conditions.

A new parking area with approximately 65 accessible spaces would be constructed along the west side of Main Circle Road. This would reduce the existing planted meadow and bioretention area within the center of Main Circle Road by approximately 33 percent. This Main Circle would be replanted as a meadow, offering native species to pollinators and birds. In order to offset the reduction in the existing bioretention area and the introduction of new parking and expanded pavement, stormwater management facilities would be installed, and could include the introduction of bioretention areas, the use of permeable pavement, or other techniques.

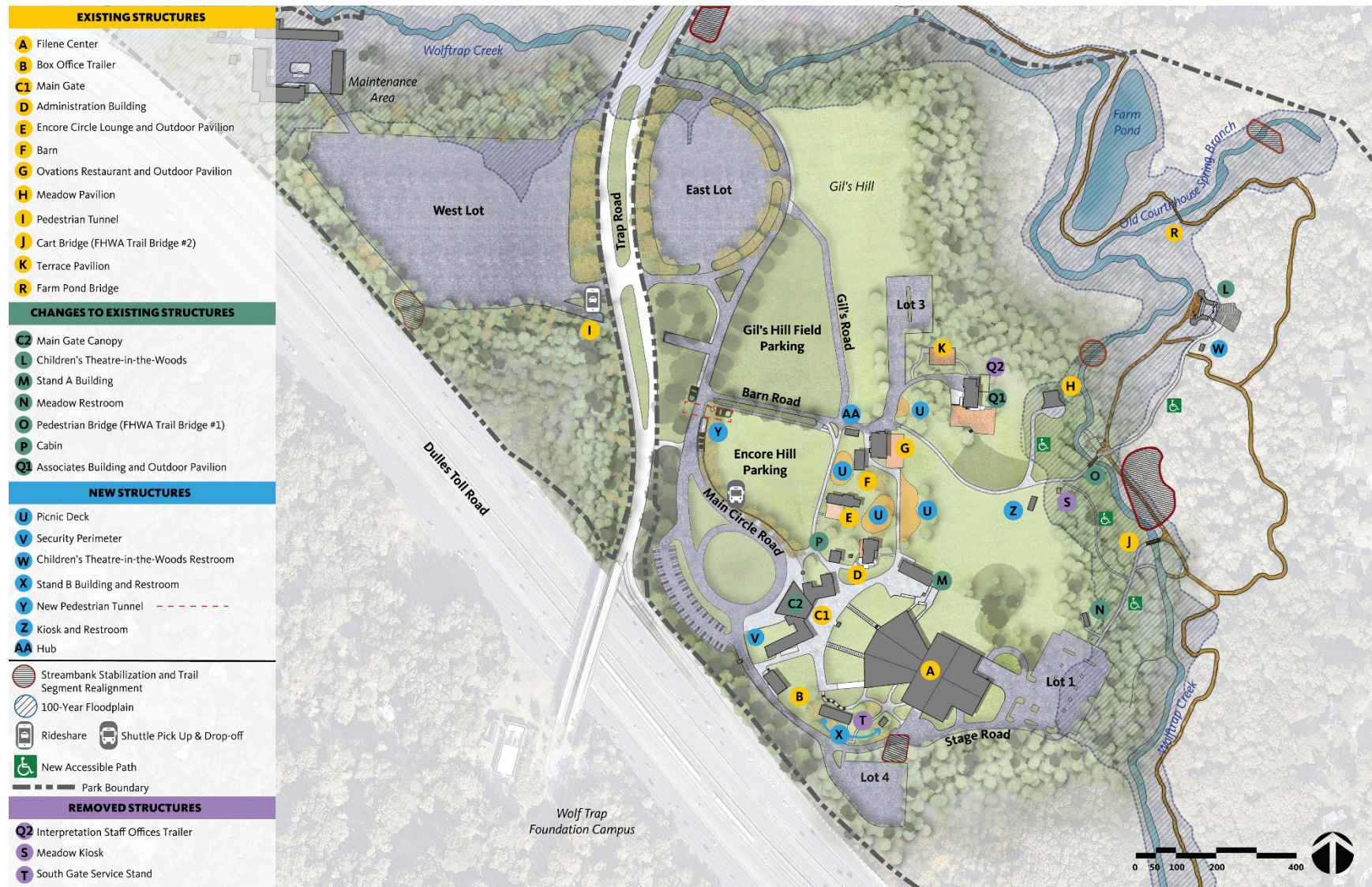
The West and East Lots would incorporate stormwater management improvements to reduce stormwater runoff. NPS and the Foundation would implement techniques to reduce the amount of runoff into Wolf Trap Creek and other locations and support streambank stabilization. Such efforts could include the introduction of bioretention areas, vegetated islands, and the use of permeable pavement.

Pedestrian Circulation

Accessible Circulation

The Plan would provide new accessible connections within the park. Elevators would be installed in the Stand A and Stand B buildings to improve accessibility between the lower and upper levels of the Filene Center. Elevators would connect the lower, upper, and plaza (entry) levels of the Filene Center, levels between which current access is unavailable. Additionally, the Filene Center seating would be reorganized to improve circulation through the addition of central aisles, which would increase the

Figure 3: Map of Proposed Action Alternative



number of accessible seats, improve accessibility in general, be more convenient for visitors and patrons, and provide better emergency access to seating. Existing paths to the Meadow Pavilion and Children's Theatre-in-the-Woods, performance spaces that are currently inaccessible, would be made accessible to meet the Architectural Barriers Act Accessibility Standard (ABAAS). Visitors could use Lot 3 to connect to accessible routes that provide direct connections or offer a route through the wooded landscape.

Pathways along the north-south entry corridor between Gil's Hill and the Filene Center would be widened to better accommodate visitors and patrons from their current width of 15 feet to an estimated 20 feet. Trails in the park would be realigned in areas that have suffered erosion or other design issues, and one trail bridge would be replaced.

A new pedestrian connection would extend the existing sidewalk along Main Circle Road, install a sidewalk along the southern side of Barn Road, add a pedestrian path to the Gil's Road, and add a new tunnel under, Main Circle Road at Barn Road. The tunnel under Main Circle Road and Barn Road would replace an at-grade pedestrian crossing of Main Circle Road. The tunnel would offer visitors the option to access the Barn Road pathway or Main Circle Road to join the queueing area. Before performances, the connection would provide direct access to lines to the Filene Center. After performances, the connection would facilitate access to Gil's Hill and Encore Hill field parking via Barn Road (see **Figure 4**). These improvements would both enhance safety and provide for easier vehicular traffic flow by eliminating the existing pedestrian/vehicle conflicts. The new tunnel would require re-grading of the area but would not alter the existing roadway grade.

Figure 4: Close-up of Pedestrian Tunnel



Queuing areas for Filene Center performances along Main Circle Road for approximately 225 feet and the primary north-south access from Gil's Hill for approximately 125 feet would include walkway treatments to help protect patrons and visitors from the elements, especially the sun during hot summer months. These treatments would consist of structures and locally-sourced, native vegetation that complement and are compatible with the natural setting of the park. The structures would be discontinuous, providing breaks to maintain an open feeling while also providing cover from the elements. The structures' design would be compatible and sympathetic to the setting of the park in order to provide a cohesive arrival experience. Treatments could include temporary coverings, such as cloth canopies. Prior to implementation, NPS and the Foundation would undertake shade studies to guide the design and placement of the treatments.

Visitor and Patron Facilities

Main Gate and Filene Center

The Main Gate plaza would be expanded and enhanced to provide an expanded canopy and improvements for security and pedestrian flow, and to provide cover for security staff and visitors during the security screening process. The intent is to offer a canopy that extends to the edge of the new roadway configuration, an increase of approximately 50 percent of the existing canopy structure. The plaza area, including canopy, would increase from 50 feet from the curb to 85 feet from the curb. The height of the new structure would be limited so as to maintain the striking view of the Filene Center one encounters walking up the hill toward the Main Gate.

The Filene Center would undergo multiple improvements. The orchestra-level seating arrangement would be reconfigured to include additional aisles and improve accessibility. The sound systems, theatrical lighting, and house lighting system fixtures would be replaced with new audio-visual systems.

Stand A Building

Food Services Stand A would be replaced with a new structure. The new building would be universally accessible, connect the upper and lower Filene Center areas (which are not presently universally accessible) with two new elevators, and include concession services both inside and outside the ticketed venue. The new building would also include new restrooms, deck area/lounge, and plaza area. The enclosed building of Stand A would be a maximum of 9,000 square feet and the outdoor covered area would be a maximum of 14,000 square feet, with a total footprint of approximately 23,000 square feet. No rooftop deck would be incorporated into the new structure.

The design of the new Stand A would be sympathetic to the existing Filene Center. The new Stand A would be located against the existing slope leading from the current structure to the lower Filene Center areas. Stand A structure would continue to be secondary to the Filene Center.

Stand B Buildings

The South Gate Service Stand would be replaced with two new buildings that would provide concession service, restrooms, covered security screening, and a picnic area. An elevator would provide universal access between the lower, upper, and plaza levels of the Filene Center. The implementation of Stand A and Stand B could occur independently of one another. The enclosed building and the outdoor covered area of Stand B would be up to approximately 9,000 square feet each, with a total footprint of approximately 18,000.

Other Visitor and Patron Facilities

- Universally accessible picnic areas would be added between Gil's Hill and the Filene Center, overlooking the meadow hill between the existing Ovations Restaurant and Food Services Stand A.
- The existing Meadow Pavilion would be replaced if the structure is substantially damaged by weather or flooding. If replaced, a new structure of similar scale and style would be relocated outside the floodplain.
- A new Children's Theatre-in-the-Woods Pavilion would add temporary restroom facilities in the short term to provide restrooms near the Children's Theatre-in-the-Woods, which is removed from other restroom facilities within the park. The NPS and the Foundation would monitor conditions to determine if permanent facilities are needed at this location.
- A new kiosk would be placed in the vicinity of the existing Meadow Kiosk, which would be removed concurrently. The new kiosk would provide concessions and/or information opportunities. Additionally, temporary restroom facilities co-located at the location would service visitors to the Meadow Pavilion and the Children's Theatre-in-the-Woods. The NPS and the Foundation would monitor conditions to determine if permanent facilities are needed at this location.
- Improvements, including streambank stabilization, would improve flood resilience of the Children's Theatre-in-the-Woods and the Meadow Restrooms.

Interpretation and Education

A new visitor information kiosk, also referred to as the Hub, would be added along Barn Road to the north of the Barn. The structure, estimated to be up to a maximum of 400 square feet, would include educational and interpretive displays. A comprehensive signage and wayfinding system would be developed to inform and direct visitors and patrons to the park and provide in-depth information on the full range of park features and amenities that are available year-round.

Administration, Operations, and Safety

Several administrative structures would be improved. The Associates Building would be rehabilitated or replaced in-kind with updated offices, catering kitchen, and a restroom. The adjacent Interpretation Staff Offices Trailer would be removed. The existing Cabin would be rehabilitated to support services, such as the U.S. Park Police (USPP), a visitor contact station, or usher space. Security apparatus and safety equipment would be added to the Filene Center entrance.

The park's safety and security approach calls for several elements related to the Main Gate, primary pedestrian corridors, and parking areas. The plaza at the Main Gate would extend approximately 85 feet to the roadway in order to provide a stand-off distance and perimeter security to prohibit vehicular incursions. The Main Gate would also include enhanced security screening equipment. A staff member would continue to be posted at the bottom of the Stage Road prior to the stage entrance directing vehicles and patrons to the appropriate parking area and entrance points.

All building projects would strive to incorporate sustainable development practices. In addition to the inclusion of bioretention facilities and permeable pavement discussed elsewhere, potential strategies for exploration include the use of renewable energy sources and sustainable or recycled materials in the

design and construction. Renewable energy sources could include solar panels within the park. Green roofs could also receive consideration.

The NPS and the Foundation would implement the proposed plan over an estimated 20 years. Each implemented element would include appropriate supporting documents, such as stormwater management plans and existing tree surveys. Appendix C includes a phasing plan for individual project implementation.

Retained Features

The following existing features would be retained in their current condition in the proposed Plan and decision from the 1997 GMP would still apply:

- All other structures and buildings
- Vehicle access points from Trap Road
- Pedestrian tunnel below Trap Road
- Gil's Hill and Encore Hill field parking areas, and Lots 1, 3, and 4
- All other internal roadways
- Lawn seating at the Filene Center

Table 1 summarizes the projects identified in the Action Alternative:

Table 1: Summary of Proposed Plan Elements

Location	Element
Main Circle	Widening of lanes
	New southern parking
	Expanded Main Gate Canopy
	Expanded Main Gate Plaza
	Retained Metro shuttle pickup/drop-off
	New walkway treatments
	Reconfiguration of bioretention area
Filene Center	Reconfiguration of seating
	Stand A replacement w/ elevator
	Stand B addition w/ elevator
Core Farm	Widened pathways
	New walkway treatments
	New Barn Road walkway
	New pedestrian tunnel
	New Visitor Information Kiosk
	New and replaced picnic facilities that are universally accessible
	Associates Building and Cabin rehabilitation
East	Realignment of eroded trails
	New accessible trails
	Bridge replacements
	Streambank stabilization
	New Meadow Kiosk and Restrooms
	Meadow Pavilion replacement

Location	Element
West	Children's Theatre-in-the-Woods Restroom
	Meadow Restroom floodproofing
	Streambank stabilization
	New stormwater management

Accompanying graphics can be found in Appendix B.

MITIGATION MEASURES OF THE PROPOSED ACTION

Mitigation, according to NEPA (40 CFR 1508.20), includes the avoidance or minimization of impacts to resources. Mitigation measures would be implemented under the proposed action, whenever feasible, for resource protection and to minimize disruption to visitors. The exact mitigation measures would depend upon the individual project designs and plan approvals by relevant agencies. The following mitigation measures are proposed to reduce impacts as a result of the proposed action. Mitigation measures may be mandatory, such as those measures that are required by law, special conditions of permits or authorizations, or by NPS policy. Some measures are voluntary, including those measures that are not required but would be implemented into the final design as a best practice to reduce resource impacts or visitor disruption.

Cultural Landscapes

Alternative B would minimize impacts on the cultural landscape by avoiding much of the woodlands and paved and turf parking areas, as well as retaining and continuing operation of multiple contributing buildings and structures. The NPS and Foundation will design new features to fit within the size, scale, design, materials, color, and texture of historic elements to which the feature will be spatially related. The alternative would mitigate adverse impacts on the cultural landscape by using materials (e.g., wood, stone) and a design that are compatible with the historic character of the landscape. The bridge replacement, surface materials for the updated walkways, rehabilitation of the Associates Building and Cabin, and small-scale improvements (i.e., signage) would be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and *Secretary of the Interior's Standards Guidelines for the Treatment of Cultural Landscapes*. If contributing buildings or structures within the site are altered, removed, or replaced, the NPS and the Foundation will conduct Historic American Buildings Surveys (HABS) to record the resources. Consultation with the Virginia State Historic Preservation Office (VA SHPO) and Tribal Historic Preservation Offices (THPOs) would occur as specific projects are designed and implemented.

Archeological Resources

The NPS would avoid and minimize potential adverse impacts on archeological resources by undertaking archeological investigation for any areas of potential ground disturbance with moderate to high archeological potential. Such investigations would include, at a minimum, pedestrian inspection, close-interval shovel testing, and/or mechanical removal of thick fill overburdens to test potential stable, buried surfaces, and associated geoarcheological investigation to identify areas with the greatest chance of containing buried paleosols. All proposed archeological investigations would be planned in consultation with NPS, the VA SHPO, and the THPOs.

The potential for encountering historic burials or cemeteries is considered low, while the potential for encountering precontact burials or cemeteries is considered moderate. Therefore, a protocol for the unanticipated discovery of cemeteries or human remains should be developed for the construction contractor. If any Native American burials, cemeteries, or funerary objects are encountered, NPS would

contact federally recognized Tribes with affiliation in Virginia, in accordance with the Native American Graves Repatriation Act (NAGPRA).

NPS would also avoid disturbing known archeological resources during design and construction to the extent practicable. During the construction phase, NPS would also minimize ground-disturbing activities to the extent practicable, including using existing vehicle circulation areas and construction methods that minimize land disturbance.

Visitor Use and Experience

In order to minimize impacts on visitor use and experience during construction, NPS and the Foundation would, to the extent practicable, construct facilities during months with limited performances.

ALTERNATIVES DISMISSED FROM FURTHER CONSIDERATION

The NPS considered multiple alternative options during scoping for the proposed Plan that were ultimately dismissed from further consideration. A description of these concepts is provided in Appendix D.

RATIONALE FOR THE PREFERRED ALTERNATIVE

The preferred alternative is the alternative that “would best accomplish the purpose and need of the proposed action while fulfilling [the NPS] statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors” (46.420(d)). The NPS has identified Alternative B as the preferred alternative because Alternative B would meet the project purpose and need. Alternative B would improve accessibility, visitor amenities, address deferred maintenance areas and improve ecological function of waterways, and further enable year-round access to the park.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes current environmental conditions in and around the project area. The discussion is focused on resources that could potentially be affected by the implementation of the proposed project and provides a baseline for understanding the current condition of the resources. This section also includes an analysis of the environmental consequences, or “impacts,” of the No Action and Action Alternatives.

The Affected Environment description is followed by the Environmental Consequences analysis for each resource topic. The resource topics analyzed here correspond to the planning issues and concerns described in the Purpose and Need section of this EA.

In accordance with the Council on Environmental Quality (CEQ) regulations, the environmental consequences analysis includes the direct, indirect, and cumulative impacts potentially resulting from the proposed alternatives (40 CFR 1502.16). The intensity of the impacts is assessed in the context of the park’s purpose and significance, and any resource-specific context that may be applicable (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are described and their effect on the severity of the impact is noted. The methods used to assess impacts vary depending on the resource being considered but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

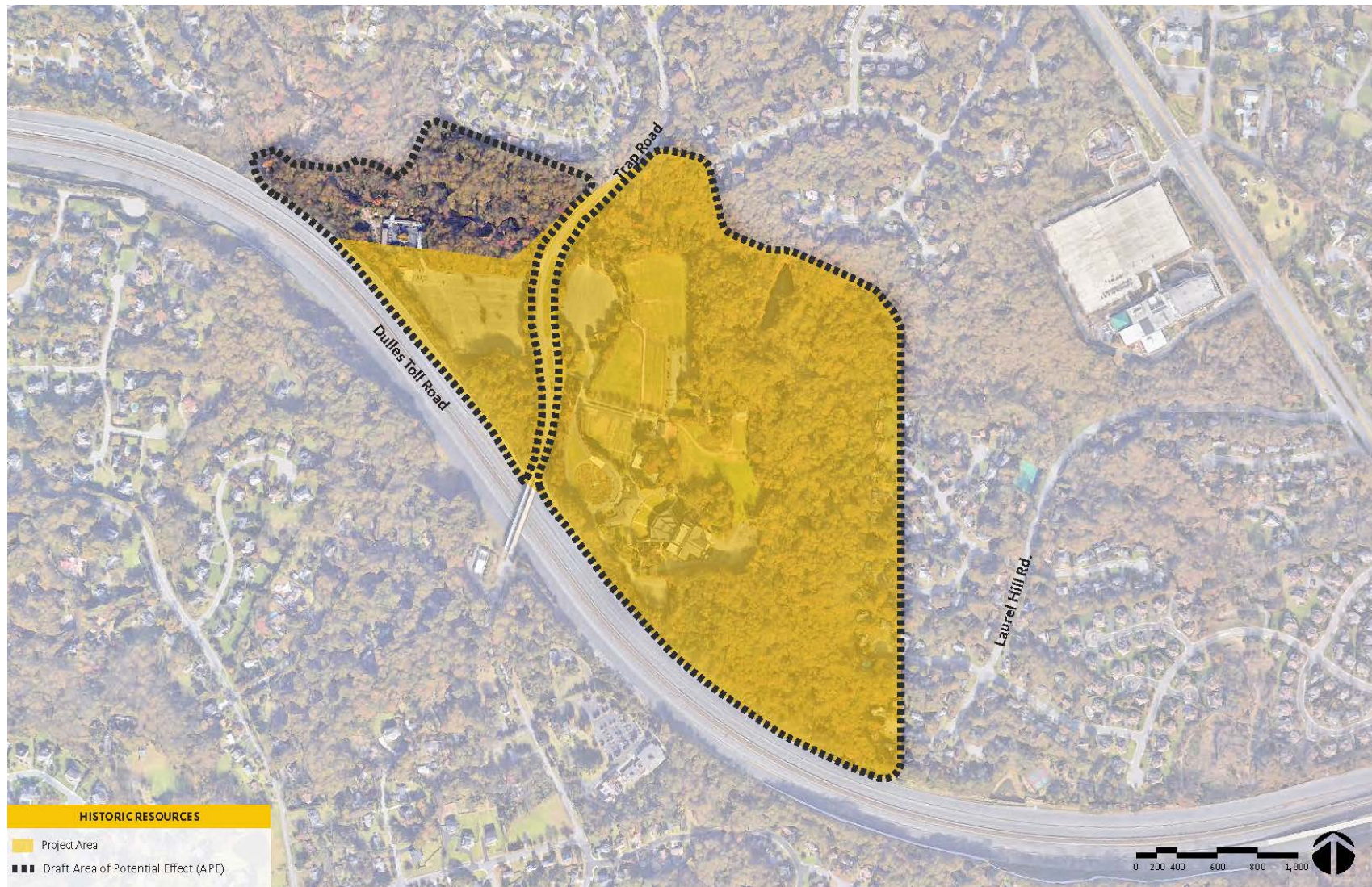
CULTURAL LANDSCAPES

Historic properties were identified within the project’s Area of Potential Effect (APE) (see **Figure 5**). As defined by 36 CFR 800.16(d), the APE represents “the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” Historic properties in the APE are documented in the Wolf Trap National Park for the Performing Arts Cultural Landscape Report (CLR) (NPS 2021).

In this EA, the different types of historic properties are addressed by resource type to best describe the impacts of the proposed project on the APE. The NPS evaluates historic buildings and structures, cultural landscapes, and archeological resources as different resource categories. This section specifically addresses cultural landscapes. Archeological resources are addressed in the Archeological Resources section that follows.

Cultural landscapes consist of “a geographic area (including both cultural and natural resources and the wildlife or domestic animals therein) associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values.” Cultural landscapes include the features and systems that compose the existing landscape and convey the historic character of the landscape associated with a historic period of significance. Cultural landscape characteristics include natural systems and features, topography, spatial organization, vegetation, land use, circulation, views and vistas, buildings and structures, and small-scale features that contribute to the landscape’s historic character.

Figure 5: Area of Potential Effect



Affected Environment

The cultural landscape is composed of approximately 130 acres that encompass the study area, including three performance spaces: the Filene Center, the Children's Theatre-in-the-Woods, and the Meadow Pavilion. It is significant as the first and only national park dedicated to the performing arts, and for its association with Catherine Filene Shouse, an accomplished activist, author, and public servant who donated the land for the park and was influential in its early development.

Although a formal determination of eligibility for listing in the NRHP has not been completed, the CLR concludes that Wolf Trap National Park for the Performing Arts is potentially eligible for the NRHP under the following criteria:

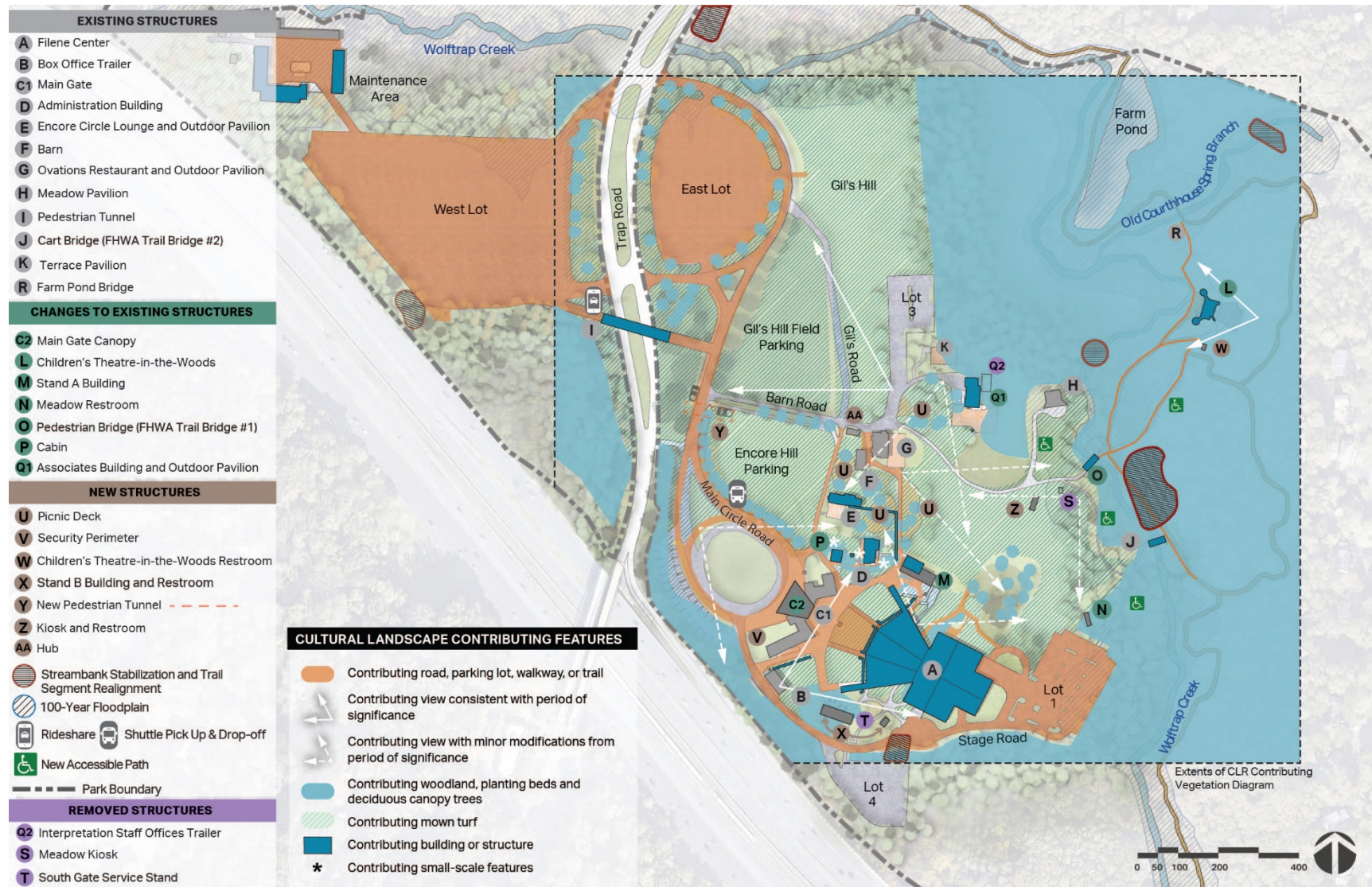
- Criterion A for its significance as a nationally celebrated performing arts venue.
- Criterion B for its association with a potentially significant person, Catherine Filene Shouse, as the place most closely associated with her contributions to American history.

The period of significance for Wolf Trap National Park for the Performing Arts begins in 1930, when Catherine Filene Shouse purchased her first 53 acres in Fairfax County, and ends in 1984, with the completion of the rebuilding of the Filene Center II and the reopening of the venue. The cultural landscape retains integrity of location, design, feeling, workmanship, materials, and association.

The cultural landscape contains multiple resources, including buildings, structures, and vegetation. Contributing elements to the cultural landscape within the APE include the following, shown in **(Figure 6)** and described in the Assessment of Effect (Appendix E):

- Spatial organization, including development clusters around the Filene Center, core farm area, and the Children's Theatre-in-the-Woods
- Circulation within the park, including the approach to the Filene Center, multiple pedestrian routes, and parking
- Views, including the core farm area and the approach view along Main Circle Road
- Vegetation, including woodlands and trees along Main Circle Road
- Buildings and structures, including the Filene Center, Stand A, the Associate's Building, and pedestrian bridges
- Natural systems, including but not limited to streams

Figure 6: Wolf Trap National Park for the Performing Arts Cultural Landscape



About the Analysis

Potential impacts on cultural landscapes affect the historic character and integrity of the landscape as defined by in CLRs and CLIs. The impacts, direct or indirect, adverse or beneficial, are analyzed in consideration of additional regulations and guidance provided by NEPA, Section 106 of the National Historic Preservation Act (NHPA), the *Secretary of Interior's Standards for the Treatment of Historic Properties*, *Guidelines for the Treatment of Cultural Landscapes*, *NPS Management Policies 2006*, *Director's Order 28*, and other NPS guidance for the treatment of cultural landscapes.

As part of the Section 106 process, an Assessment of Effects (AOE) has been prepared for the proposed project and will be submitted to the VA SHPO and THPOs for consultation and concurrence in conjunction with this EA.

Impacts of Alternative A: No Action

Under the No Action Alternative, no changes would occur to the Wolf Trap National Park for the Performing Arts cultural landscape.

Impacts of Alternative B: Action Alternative

Alternative B would make multiple adjustments to circulation throughout the site, including the reconfiguration of Main Circle Road and its adjacent walkway, and the Filene Center entry plaza; it would also place a new walkway treatment along the northern portion of Main Circle. A new pedestrian tunnel would be added at the intersection of Main Circle Road and Barn Road. Within the Filene Center area, Alternative B would replace Stand A, add a new Stand B and remove an existing South Gate service stand, and reconfigure seating within the Filene Center. Within the core farm area, the proposed action would widen walkways, add a new walkway treatment between Gil's Hill and the Filene Center, install a new sidewalk along the southern edge of Barn Road, rehabilitate the Cabin and Associates Building, add accessible picnic decks, and add a visitor information kiosk. In the eastern portion of the park, Alternative B would stabilize streambanks, introduce a new Children's Theatre-in-the-Woods restroom, add new restrooms and visitor services kiosk near the Meadow Pavilion and remove the Meadow Kiosk, and convert existing trails to the Children's Theatre-in-the-Woods and Meadow Pavilion to accessible trails. The East and West Lots would receive stormwater management treatments, which could include the introduction of vegetation or permeable pavement.

Alternative B would alter the view toward the Filene Center and the contributing circulation elements through reconfiguration and widening of Main Circle Road, the addition of parking, the installation of walkway treatments along the northern portion of Main Circle Road, and the expansion of the main gate plaza and canopy. The proposed action would remove contributing woodlands to the south of Main Circle Road to accommodate new parking and would shrink the central vegetated circle to accommodate the expanded paved entry area.

Within the Filene Center area, Alternative B would replace the existing Stand A, a contributing resource, with a new Stand A featuring a larger footprint. The new Stand A would be placed against the existing slope leading to the lower Filene Center areas, thereby appearing as a single story from the approach from Gil's Hill. The Stand A structure would be subordinate to the Filene Center, both in scale and design.

Alternative B would reconfigure seating within the Filene Center in order to accommodate accessible circulation, but would not noticeably alter the historic features of the building. Alternative B would remove the existing South Gate Service Stand, which is not a contributing resource, with a new Stand B.

The proposed action would add accessible picnic decks and expand the existing north-south walkways connecting Gil's Hill with the Filene Center. The walkway treatments between Gil's Hill and the Filene Center would add new structures to the area. The accessible picnic decks would replace the existing picnic tables at the edge of the meadow near the core farm area. The walkways would be widened, improving circulation. These features would add new built elements to views within the core farm area. Additionally, a new visitor information kiosk would introduce a new structure along the northern edge of the core farm area. Combined, these elements would maintain the overall spatial relationships of the core farm area by replacing similar facilities in existing locations, or, in the case of the kiosk, by placing the structure at the edge of the development core; the impact as a result of these changes would not be detectable. The contributing Associates Building would be rehabilitated and the existing non-contributing interpretation staff offices trailer would be removed. The contributing existing cabin would be rehabilitated and house support services, such as the U.S. Park Police, a visitor information station, or usher space.

Alternative B would add a new restroom and visitor services kiosk in the vicinity of the Meadow Pavilion, located to avoid potential impacts on view within the cultural landscape; the existing Meadow Kiosk would be removed. In the event that the Meadow Pavilion is substantially damaged due to flooding or other issues, the structure would be replaced with a new facility similar in scale outside the floodplain. A new restroom would also be located near the Children's Theatre-in-the-Woods, placed to avoid changes to views or spatial organization.

Accessible trails would connect the primary path north of the meadow to the Children's Theatre-in-the-Woods and the Meadow Pavilion, improving existing routes. One pedestrian bridge across Wolf Trap Creek would replace one contributing but failing bridge. Existing trails that suffer from erosion would be re-routed and re-designed to improve their function. Re-routed trails would be revegetated, although contributing trails would be maintained to include a trace. Streambanks along Wolf Trap Creek would be stabilized within the woodlands. Each of these items would be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and *Secretary of the Interior's Standards Guidelines for the Treatment of Cultural Landscapes*.

The East and West Lots would add new tree cover and potentially explore changes from the contributing existing paved asphalt lots to permeable surfaces. Although these changes would alter the contributing circulations features, the overall changes would be consistent with the purpose and function of the features.

Alternative B would have adverse impacts on the Wolf Trap National Park for the Performing Arts cultural landscape as a result of the reconfiguration of the Main Circle Road entry, including the addition of walkway treatments; replacement of Stand A and introduction of Stand B; removal of contributing woodlands; and the addition of picnic decks and walkway treatments in the core farm area through the changes in the setting, circulation, vistas and views, and spatial relationships within the site. The alternative would mitigate adverse impacts on the cultural landscape by using materials (e.g., wood, stone) and a design that are compatible with the historic character of the landscape. The bridge replacement, surface materials for the updated walkways, rehabilitation of the Associates Building and Cabin, and small-scale improvements (i.e., signage) would be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and *Secretary of the Interior's Standards Guidelines for the Treatment of Cultural Landscapes*. Consultation with the VA SHPO and THPOs would occur as specific projects are designed and implemented.

ARCHEOLOGICAL RESOURCES

Affected Environment

This section of the EA addresses archeological resources within the APE. A Phase IA Archeological Assessment for the APE was conducted in 2021 in conjunction with the preparation of this EA (Seibel and Regan 2021). The assessment reviewed historic maps and previous investigations and recorded sites, topography, and existing conditions in an effort to identify the archeological potential within the APE. The following section summarizes the findings from the Phase IA Archeological Assessment.

The APE includes areas of both precontact and historic archeologic potential. The Phase 1A Archeological Assessment identifies most of the site as having low precontact archeological potential. The site contains two acres of moderate and 15.8 acres of high precontact archeological potential. By contrast, most of the site has low historic archeological potential, with the exception of four and 3.4 acres, respectively, of moderate- and high-historic archeological potential areas.

Six archeological sites registered with the VA SHPO are located within the APE, although two have been recommended as Not Eligible for listing in the NRHP. The registered sites include the following, which are described in Appendix E:

- Chittendon Archeological Site (Mid-late Archaic; Pre-Contact)
- Wolf Trap Quarry Archeological Site (Early-late Archaic, Early Woodland)
- Wolf Trap Farm House Site Archeological Site (Precontact/Early 19th to mid-20th century)
- Dump (20th century)

About the Analysis

Archeological resources typically exist in subsurface contexts. Archeological resource surface finds are also possible. Archeological structural ruins, such as stairs, can also occur above ground. Therefore, potential impacts on archeological resources are assessed according to the extent to which the proposed alternatives would involve ground disturbing activities such as excavation or grading. Analysis of possible impacts on archeological resources is based on a review of previous archeological studies, consideration of the proposed design concepts, and other information available on the archeological context of the area. The APE for archeological resources is identical with that defined for historic properties.

As defined in the implementing regulations of the Archaeological Resources Protection Act of 1979 (ARPA) at 43 CFR 7.3a, archeological resources are any material remains of human life or activities which are at least 100 years of age, and which are of archaeological interest. Any resources within the APE that meet this definition and are, or may be, defined as significant under NRHP Criterion D (having the potential to provide information important to history or prehistory) are granted protection as required under ARPA. ARPA is intended to protect archeological resources on public lands for the present and future benefit of the American people.

As part of the Section 106 process, an Assessment of Effects has been prepared for the project and will be submitted to the VA SHPO and THPOs for review and approval in conjunction with this EA.

Impacts of Alternative A: No Action

Alternative A would not implement any transportation upgrades within the APE. Because no new structures would be added and no modifications would be made to the existing roadways, pedestrian paths, or other structures, there would be no new ground disturbance and, therefore, no new impacts on archeological resources in the APE.

Impacts of Alternative B: Action Alternative

Alternative B would make multiple adjustments to circulation throughout the site, including the reconfiguration of Main Circle Road and its adjacent walkway, and the Filene Center entry plaza; the proposed action would add a new pedestrian tunnel at the intersection of Main Circle Road and Barn Road. Within the Filene Center area, Alternative B would replace Stand A, add a new Stand B, and remove an existing South Gate service stand. Within the core farm area, the proposed action would widen walkways, rehabilitate the Cabin and Associates Building, add accessible picnic decks, and add a visitor information kiosk. In the eastern portion of the park, Alternative B would stabilize streambanks, introduce a new Children's Theatre-in-the-Woods restroom, add a new restroom and visitor services kiosk and remove the Meadow Kiosk, and add accessible trails to Children's Theatre-in-the-Woods and Meadow Pavilion. The East and West Lots would have trees added and be repaved with permeable materials.

The APE has areas with a high potential to contain undocumented precontact and historic archeological deposits. Any ground-disturbing activities planned outside of areas previously subject to intensive archeological excavation or deep mechanical disturbance have a high potential to encounter undocumented archeological sites or archeological deposits associated with known archeological resources (e.g., Chittendon Archeological Site).

Ground disturbance related to the proposed project elements could disrupt or displace unknown archeological resources and result in a loss of integrity of the archeological resource, resulting in an adverse impact. In order to avoid and minimize potential adverse impacts, the NPS would undertake archeological investigation for any areas of potential ground disturbance with moderate to high archeological potential. Such investigations would include, at a minimum, pedestrian inspection, close-interval shovel testing, and/or mechanical removal of thick fill overburdens to test potential stable, buried surfaces, and associated geoarcheological investigation to identify areas with the greatest chance of containing buried paleosols. All proposed archeological investigations would be planned in consultation with the NPS and the VA SHPO and THPOs.

The potential for encountering historic burials or cemeteries is considered low, while the potential for encountering precontact burials or cemeteries is considered moderate. Therefore, a protocol for the unanticipated discovery of cemeteries or human remains should be developed for the construction contractor. If any Native American burials, cemeteries, or funerary objects are encountered, NPS would contact federally recognized Tribes with affiliation in Virginia, in accordance with the Native American Graves Repatriation Act (NAGPRA).

NPS would also avoid disturbing known archeological resources during design and construction to the extent practicable. During the construction phase, NPS would also minimize ground-disturbing activities to the extent practicable, including using existing vehicle circulation areas and construction methods that minimize land disturbance.

VISITOR USE AND EXPERIENCE

Affected Environment

The park provides opportunities for visitors to attend a wide range of performing arts at three outdoor performance venues, participate in related educational programs, hike through the park's woodland, picnic, sled, and experience a tranquil and natural environment. The park received an average of 407,500 visitors annually between 2015 and 2019. The park's performance season runs from late May to mid-September. The majority of performances are held in the summer, making June, July, and August the peak visitation months. A visitation spike occurs in December due to a holiday concert (NPS 2011; n.d.). The park's primary performance venue is the Filene Center, which currently offers approximately 75 performances annually, with a capacity of approximately 7,000. The Meadow Pavilion is used during the summer for workshops and intermittently in the fall and spring for education programs. The Children's Theatre-in-the-Woods (approximately 700 capacity) hosts approximately 35 shows annually and is used during the summer for children's theater performances and intermittently in the fall and spring for education programs (NPS 2011; n.d.).

Vehicle and Pedestrian Circulation

Trap Road and Access Driveways - Trap Road is a three- to four-lane roadway that provides park access from the Dulles Toll Road and neighborhoods north and south of the park. Two driveways along Trap Road provide vehicle access into the park: the upper driveway and the lower driveway. The upper driveway, the southernmost driveway along Trap Road, provides vehicle access to Main Circle Road. Before events, vehicles enter through the upper driveway to park in the Encore Hill field parking area, along the circle, and in Lots 1 and 4. After events, both upper driveway lanes are utilized for exiting vehicles. Vehicles in the right and left lanes make right and left turns onto Trap Road, respectively.

The lower driveway, the northernmost driveway along Trap Road, provides vehicle access to the East Lot Access Road and West Lot. Before events, vehicles enter through the lower driveway to park in the West Lot or east side of the park, depending on the time of arrival and congestion on Trap Road. Closer to event showtime, all southbound vehicles on Trap Road are directed to the West Lot. All northbound vehicles on Trap Road are directed to the east side of the park. After events, the lower driveway handles most exiting traffic from the West Lot, the Gil's Hill field parking area, and the East Lot.

Trap Road and the driveways experience congestion before and after events. Before events, vehicles exiting onto Trap Road from the Dulles Toll Road experience difficulty weaving into the appropriate Trap Road lanes for the two driveways. Drivers stopping and asking for directions, traffic queues from on-site parking, and vehicles circulating to seek alternative parking locations when site parking is full result in additional congestion on Trap Road. Numerous USPP and vehicle interactions at the upper driveway (e.g., vehicle screening, interacting with patrons for assisted parking requests, describing park layout and directions) result in vehicle backups on Trap Road and slows access to the circle area. After events, left-turning vehicles from the upper driveway on the east side of Trap Road must merge with exiting traffic from the West Lot. This merge, along with the reduction in number of lanes on southbound Trap Road, creates a vehicle conflict point. Exiting traffic congestion on Trap Road also occurs from over two-thirds of exiting patrons who are trying to access the one-lane, eastbound on-ramp to the Dulles Toll Road, which has limited capacity (FHWA 2015).

Internal Vehicle Circulation and Parking - Internal roadways at the park include Main Circle Road, East Lot Access Road, Barn Road, Gil's Road, and Stage Road. Parking for events at the Filene Center is available in 16 paved and grass parking areas with a total of approximately 2,700 to 2,800 parking spaces.

Main Circle Road is a two-lane, two-way roadway, which provides vehicle access from the upper driveway and East Lot Access Road to Barn Road and the Filene Center Main Gate plaza. To the west and south of the Encore field parking area and Barn Road, Main Circle Road is a one-lane, one-way roadway, which forms a loop around the circular, bowl-like vegetated area known as the ‘dimple.’ This portion of Main Circle Road is also known as the ‘circle.’ The circle contains paved and grass parking areas on both sides, including USPP, ADA, and VIP parking. The circle also contains EMS/fire parking, a bus stop for the Wolf Trap Express Shuttle, and the courtesy shuttle drop-off/pick-up area. During events, the circle is a very active area with vehicle parking, pick-ups/drop-offs, vehicles circulating through to access Lots 1 and 4, pedestrians walking in the street with traffic, and pedestrians accessing the Filene Center Main Gate, resulting in congestion and vehicular queues.

Barn Road is a two-lane, grass median-divided, two-way roadway, which provides vehicle access to Encore Hill field parking and Lot 3. Barn Road is also a major pedestrian route to the Ovations Restaurant, the Circle, and the Filene Center. Large delivery trucks also use Barn Road to access the Ovations Restaurant during both event and non-event time periods.

Gil’s Road is a one-lane, paved path, which is used for entering and exiting vehicles parking at Gil’s Hill. Pedestrians also use the path to access Barn Road and the Filene Center.

The internal roadways and parking lots experience the following congestion and other challenges. No internal roadway or driveway names other than Barn Road and the reference to the Circle Area is provided on any NPS or Foundation literature. Many vehicles arriving have difficulty locating parking lots. Slow-moving vehicles looking for signs to parking lots result in delays along the driveways and internal roadways. Internal congestion also results from park staff stopping traffic for pedestrian crossings and the courtesy shuttles. Some internal congestion also results from the screening of parking hang tags for donor parking, access to the Ovations Restaurant, and discussions for handicapped parking locations. Before events, many parking lots are not secure, and vehicles enter and park inefficiently (FHWA 2015).

Pedestrian Circulation – The park contains paved sidewalks and unpaved trails, which provide access to the park’s three outdoor performance venues, parking lots, wooded landscape, and other amenities. In addition to providing access to performance venues, the trails provide opportunities for hiking in the park’s natural landscape.

A pedestrian tunnel under Trap Road provides pedestrian access between the west and east sides of the park. Upon exiting the tunnel on the east side of Trap Road, pedestrians proceed along a sidewalk on the west side of Main Circle Road, cross Main Circle Road at an at-grade crosswalk, and proceed to the Filene Center Main Gate plaza via a sidewalk on the east side of Main Circle Road. Pedestrians accessing the Filene Center from the East Lot proceed along the same path. Several occurrences of pedestrian midblock crossings occur prior to reaching the crosswalk have been observed, resulting in pedestrian-vehicular conflicts.

Signage along the west side of Trap Road directs pedestrians to use the pedestrian tunnel to access the eastern portion of the park. Almost all pedestrians who have parked at the Barns south of the Dulles Toll Road and have crossed the Dulles Toll Road pedestrian bridge or have illegally parked along the shoulder or median areas of Trap Road illegally cross Trap Road and use an unpaved emergency vehicle driveway to cut through to Main Circle Road. Other pedestrians also illegally cross Trap Road and use this driveway.

Additional pedestrian-vehicular conflicts occur as the result of the following: directives of Park Rangers are often ignored by pedestrians and drivers; many pedestrians ignore park staff directives and walk in the roadway; drivers ignore park staff directives and drive to the Encore Hill field parking when they have

been directed to the Circle area; and drivers refuse to stop their vehicles when requested. Additionally, patrons who park on Gil's Hill walking on or beside the one-lane Dave Thompson Highway, which is also used by vehicles entering and exiting the Gil's Hill parking area. After events, patrons also have difficulty locating their vehicles in the parking lots (FHWA 2015).

ADA Access - ADA-accessible parking is provided at four of the paved parking areas, Lot 1, Lot 3, Lot 4, and around the Main Circle Road, totaling 41 striped handicap parking spaces. Patrons seated in the lower orchestra level of the Filene Center are directed to park in Lot 4, with Lot 1 used for overflow accessible parking, if parking is available. Patrons seated at the lawn are directed to park around the circle, which does not meet accessibility requirements.

A courtesy shuttle is provided to patrons with mobility needs, but who do not formally require accessible parking, and need assistance accessing the Filene Center Main Gate from the West and East Lots. The courtesy shuttle is provided via golf carts that are not fully accessible. Main Circle Drive does not contain an exclusive shuttle path due to limited right-of-way. The shuttles use both the sidewalks and roadways, mixing with pedestrians and vehicles. From the West Lot, the shuttles use the pedestrian tunnel to cross under Trap Road. Upon exiting the tunnel, the shuttle is immediately faced with pedestrians crossing in front on a sidewalk. Shuttle service begins two hours before the start of events. Shuttle service is not initially provided after events due to the surge of pedestrians and cars. A limited shuttle service, by request, is provided after events when the surge of egress traffic has left the southern driveway, often 45 minutes to one hour after the concert (FHWA 2015).

Bus, Rideshare, and Taxi Service - The Wolf Trap Express Shuttle offers roundtrip service from West Falls Church Metro Station to all Filene Center summer performances. The shuttle's drop-off and pick-up area at the park is located along Main Circle Road.

An informal rideshare and taxi drop-off and pick-up area is located in a pull-off area on the west side of Trap Road south of the southern vehicle driveway to the West Lot. Pedestrians are directed to use the pedestrian tunnel under Trap Road to circulate between the drop-off and pick-up area and the Filene Center.

Main Gate and Filene Center

The Filene Center is an open-air amphitheater which currently offers approximately 75 performances annually. The Filene Center's approximately 7,000 capacity is composed of seating inside the theater and outdoor lawn seating.

Patron and visitors access to the Filene Center is provided at four gates: the Main Gate located along Main Circle Road, which a majority of patrons pass through; the Dinner Gate located northwest of Food Services Stand A; the Access Gate (near the present cabin); and the South Gate located north of Lot 4.

Patrons and visitors queue to enter the Main Gate along an uncovered sidewalk on the north side of Main Circle Road and the uncovered primary north-south access from Gil's Hill. Due to long queues and the limited canopy over the Main Gate, many patrons and visitors are exposed to the elements as they wait. The Dinner Gate is also uncovered, leaving patrons exposed to the elements as they queue and pass through the gate.

The Main Gate plaza uses movable metal fencing to channel patrons queuing to enter. Stanchions and ropes are used for channeling patrons prior to the gates opening. Security checks includes magnetometer screening and bag checks. The current physical layout and lack of depth at the Main Gate is not ideal for

security checks. Once inside the Main Gate, several steps connect the Main Gate plaza and the lower portion of the Filene Center, which creates circulation challenges for patrons with accessibility needs.

Many of the critical building systems at the Filene Center are due or overdue for replacement and deferred maintenance is substantial. The audio-visual system is also aging and does not meet the technical expectations of performances.

The Filene Center's continental seating arrangement is dated, not ABAAS-compliant, and makes emergency response difficult. Visitor navigation through the long rows of seats is awkward.

Food Services Stand A is a two-story, wood-framed concessions building, which is currently in poor condition and offers limited food service capabilities. The building is undersized and cannot efficiently handle the 63 percent increase in sales since the park opened in 1971, resulting in long lines and visitor complaints. The upper floor is at level with the Filene Center plaza and provides single-sided amenities to patrons on the plaza. A wood porch extends from the upper level on the south side of the building. The lower level includes outdated, insufficient, and non-ADA accessible restrooms, accessed from sidewalks at the level of Filene Center's main floor seating. Stairs connect the two levels. ADA access is not available between the two levels. Food Services Stand A also blocks views looking north of the meadow (DOI 2016; NPS 2013).

Other Park Features

- The Outdoor Pavilions, Encore Circle Lounge, and Ovations Restaurant provide outdoor opportunities for visitor services. The Associates Building Outdoor Pavilion and the Terrace Pavilion between Lot 3 and the Associates Building are rented out by the Foundation during the performance season. The Encore Circle Lounge is designated for Foundation members throughout the year (NPS 2011). The Ovations Restaurant is open starting 2.5 hours prior to the beginning of shows at the Filene Center. The Associates Building Outdoor Pavilion and Ovations Restaurant provide views of the Meadow.
- Picnic tables are located in the West Lot, at the top and bottom of the meadow, south of the Filene Center, around the Barn area, and on the southwest side of Main Circle Road. The meadow also provide opportunities for picnicking.
- The Meadow Kiosk provides box office operations and artist merchandise sales during Children's Theatre-in-the-Woods performances.
- The trail to the Children's Theatre-in-the-Woods experiences repeated flooding and washouts (NPS 2013).
- The Children's Theatre-in-the-Woods is a rustic wooden stage with wood benches that seat approximately 700 people. The theater is surrounded by woods creating a shaded canopy for patrons attending performances. The kiosk also serves as a meeting location for post-performance interpretive programs and Junior Ranger Day activities (NPS 2011).
- Vehicle traffic entering the park currently has unrestricted access to the box office, and stage door administration entrance. Lack of permanent vehicle barriers presents a security risk. Lot 1 is gated, while Lot 4 is open to access. Pedestrian walkways are unobstructed and most are wide enough for a vehicle to drive up to pedestrian entrances (DOI Physical Security Assessment 2016).
- Pedestrian-scale signage is scattered throughout the park and includes a welcome sign with weather alerts, directional signage to venue locations, directional signs to shuttles and an A-frame sign informing people of the security bag check policy. The Main Gate contains display cases that are maintained by the Foundation and feature posters of

upcoming events and activities. Limited information is provided about NPS-sponsored events (NPS 2011).

About the Analysis

Potential impacts on visitor use and experience at and in the vicinity of the project area were analyzed in consideration of the current visitor uses, activities, and circulation, the proposed elements included in the alternatives, the estimated increase in visitors that would result from the implementation of each alternative, and professional knowledge and judgment.

Impacts of Alternative A: No Action

Alternative A would not change circulation, visitor amenities, performance spaces, streambanks and trails, support facilities, or other management within the project area. No impacts would occur to visitor use and experience under Alternative A.

Impacts of Alternative B: Action Alternative

Alternative B would widen and provide parking along Main Circle Road, add a pedestrian tunnel under Main Circle Road and Barn Road, and expand pedestrian paths to facilitate circulation, improve accessibility, and improve safety. Alternative B would replace Stand A, add a new Stand B, and remove an existing South Gate service stand within the Filene Center area; add a visitor information kiosk; and add a Children's Theatre-in-the-Woods Pavilion to improve visitor services. The placement of parking along Main Circle Road, replacement of Stand A and the construction of Stand B to include an elevator, reconfiguration of seating within the Filene Center, addition of picnic decks, and the introduction of accessible trails to the Meadow Pavilion and Children's Theatre-In-the-Woods would improve accessibility of the park.

The construction of the elements mentioned above would temporarily close areas of the park to visitors and could limit use of locations or trails within the park, such as during the replacement of Stand A, reconfiguration of Main Circle Road, the construction of a pedestrian tunnel under Main Circle Road, realignment of existing trails, or conversion of existing trails to accessible trails. Construction would be dispersed across the park, phased over time (10 to 20 years), and construction work would occur during off-season visitor use periods when possible, minimizing construction impacts.

Vehicle and Pedestrian Circulation

Trap Road and Access Driveways – Alternative B would not change access or operations from Trap Road to the park.

Internal Vehicle Circulation and Parking – Much of the internal vehicular circulation and parking would utilize the same framework as existing conditions under Alternative B. Parking for events at the Filene Center would be available in 12 paved and grass parking areas (a decrease of four parking areas) with an estimated removal of a total of 15 of the existing 2,700 to 2,800 parking spaces.

Main Circle Road would continue as a two-lane, two-way roadway along Trap Road, but would expand to three lanes around the circle. A new parking lot with an estimated 65 spaces located south of the circle would replace four lots. The three lanes would improve circulation and enable one-way entrance and exit to the new parking lot, and continued access to Lots 4 and 1. The roadway would continue to accommodate EMS/fire parking, a bus stop for the Wolf Trap Express Shuttle, and the courtesy shuttle drop-off/pick-up area. The location of parking along the southern edge of the circle and the entrance and exit points and at the Lots 4 and 1 access would introduce pedestrian-vehicular conflicts.

Barn Road would continue as a two-lane, grass median-divided roadway with a new pedestrian walkway.

A comprehensive wayfinding plan would be implemented to help route vehicles along internal roadways and to parking lots. The addition of wayfinding would reduce delays caused by slow-moving vehicles looking for directions.

Pedestrian Circulation – Much of the overall pedestrian circulation throughout the park would continue, similar to existing conditions, although changes would add new and accessible circulation in the park. However, specific changes to improve pedestrian conditions would occur.

A new pedestrian tunnel at the intersection of Main Circle Road and Barn Road would lead pedestrians from the existing pedestrian tunnel under Trap Road to the eastern side of Main Circle Road. This tunnel would avoid vehicular-pedestrian conflicts at this intersection and support access to the primary queuing area along the northern edge of Main Circle Road.

Existing trails would be realigned and an existing bridge would be replaced to address erosion and other issues. The realigned trails and replaced bridge would offer a safer experience for visitors using the trails but would continue within a natural setting.

New wayfinding signage would continue and improve direction to pedestrians to use the existing pedestrian tunnel from the West Lot to the eastern portion of the park. Signage would also provide direction to pedestrians and vehicle drivers, thereby reducing pedestrian-vehicular conflicts.

ADA Access – The Plan would offer expanded accessible connections to parking lots, performance spaces, picnic areas, and within the Filene Center.

Main Circle Road would include an estimated 65 ADA-accessible parking spaces south of the circle; the six existing ADA-accessible parking spaces around the circle would be removed. The total of 65 new accessible parking spaces would be in addition to those at the existing three of the paved parking areas, Lot 1, Lot 3, Lot 4 offering 35 striped handicap parking spaces. Event operations would continue to direct patrons seated in the lower orchestra level of the Filene Center to park in Lot 4, with Lot 1 used for overflow accessible parking, if parking is available.

New accessible routes would offer connections, which are currently unavailable, to the Meadow Pavilion and the Children's Theatre-in-the-Woods. Visitors could follow adapted paths from Lot 1 through wooded areas to these two performance spaces.

New accessible picnic decks would expand picnic tables located in the core farm area connecting Gil's Hill with the Filene Center, replacing existing picnic tables located off the existing path that are not accessible. The new picnic decks would overlook the meadow.

Within the Filene Center area, two new elevators at a replaced Stand A, a new elevator at proposed Stand B, and a seating reconfiguration would re-route accessible circulation. Patrons would access the Filene Center through entrances at the Main Gate via accessible parking at Main Circle Road and from Lot 4 to the orchestra level. Within the Filene Center, a new seating configuration would allow patrons to circulate across the seating area. Two new elevators within the replaced Stand A, as well as a potential elevator in a new Stand B, would offer access between the upper gate and orchestra levels.

Bus, Rideshare, and Taxi Service - The Wolf Trap Express Shuttle would continue to offer roundtrip service from West Falls Church Metro Station to all Filene Center summer performances. The NPS and Foundation would coordinate with Fairfax County and other organizations to explore expansion of the

shuttle service to another Metrorail station along the Silver/Orange Line. The shuttle's drop-off and pick-up area at the park would continue to be along the circle.

Alternative B would add a new formalized rideshare and taxi drop-off and pick-up to the West Lot through minor restriping and signs. Wayfinding signage and park messaging would direct visitors to use this area during performances.

Main Gate and Filene Center

Alternative B would expand the Main Gate plaza and associated perimeter security, replace the Main Gate canopy to accommodate security screening equipment, expand the security perimeter, and add new pedestrian walkway treatments along queuing areas north of the circle.

At the Main Gate, the expanded entry plaza at the Main Gate would provide greater area for visitors and patrons entering the Filene Center to gather prior to the performance. Additionally, the enlarged entry plaza would expand the security perimeter to help ensure visitor safety from vehicular ramming or other security concerns. The Main Gate itself would be replaced with an enlarged structure to allow placement of new security screening equipment within the canopy cover, thereby reducing visitor and equipment exposure to the elements.

New walkway treatments would be applied along the northern portion of Main Circle Road, where queuing for performances would continue, and along the primary north-south access path between Gil's Hill and the Filene Center. The walkway treatments would offer patrons and visitors respite from the sun and limit exposure to rain during the sometimes hours-long wait to enter the Filene Center.

A new three-story Stand A would replace the existing structure to expand visitor services and provide elevator access to multiple levels of the Filene Center. On the top (plaza) level, Stand A would provide double-sided concessions that could be accessed from outside and within ticketed areas, allowing visitors to purchase concessions without entrance to the performance space. Stand A would provide additional restrooms, concessions, and a deck/lounge area to patrons within the ticketed area. Expanded plazas adjacent to Stand A, both outside and within the ticketed area, would provide additional queuing areas for the restrooms and concessions.

The Stand A elevators would connect the three levels within the Filene Center. This would enable accessible circulation within the facility by connecting the orchestra, lawn, and plaza levels.

A new Stand B would replace the South Gate Services Stand with a new concession area and a new restroom structure. The new structure would offer restrooms and concessions on the southern portion of the Filene Center, allowing easier access to patrons on that side of the facility.

The Filene Center would undergo updates to address deferred maintenance and replace the audio-visual system.

Other Park Features

Alternative B would also add a visitor information kiosk and a new Children's Theatre-in-the-Woods Kiosk, possibly replace and relocate the Meadow Pavilion, and adapt the Meadow Restroom to the floodplain. A new visitor information kiosk at the intersection of the primary north-south connection to the Filene Center and Barn Road would provide information to visitors regarding navigation, performance, park resources, and other items of interest. A new Children's Theatre-in-the-Woods Kiosk would provide restrooms. Initially, these facilities would be temporary; NPS and the Foundation would

monitor them to determine if permanent facilities would be appropriate, as well as possible box office operations, food service, and artist merchandise sales during Children's Theatre-in-the-Woods performances, as well as restrooms. The kiosk would reduce the distance required for visitors and families needed to access these services when attending a performance at the Meadow Pavilion or the Children's Theatre-in-the-Woods. Pedestrian wayfinding and interpretation signage would be placed at key points within the park to improve navigation and provide visitor information.

The overall changes to circulation, the Main Gate and Filene Center, and other park features would result in beneficial impacts on visitor use and experience by improving safety and circulation, including accessible circulation; offering new or improved recreation experiences, such the picnic areas and realigned trails; and installing new visitor amenities.

CONSULTATION AND COORDINATION

The NPS involved the public during the NEPA process to provide an opportunity for the public to comment on the proposed project. Consultation and coordination with federal and state agencies and other interested parties was also conducted to refine the alternatives and identify issues and/or concerns related to park resources. This section provides a brief summary of the public involvement and agency consultation and coordination that occurred during planning.

- The NPS held one public scoping meeting during the 30-day public scoping comment period, at which time the public, agencies, and interested parties were invited to submit comments on the proposed project.
- The NPS distributed early consultation on the Plan with Fairfax County, the National Park and Planning Commission (NCPC), and the Virginia Department of Transportation on May 12, 2021.
- The NPS initiated consultation with the Virginia DHR in a letter dated February 20, 2020, and to the following THPOs on May 13, 2021:
 - Mattaponi Indian Tribe
 - Nottoway Indian Tribe of Virginia
 - Cheroenhaka Nottoway Nation
 - Patawomeck Indian Tribe of Virginia
 - Pamunkey Indian Tribe
 - Upper Mattaponi Indian Tribe
 - Rappahannock Tribe
 - Nansemond Indian Nation
 - Chickahominy Indian Tribe
 - Chickahominy Tribe Eastern Division
 - Monacan Indian Nation
 - Catawba Indian Nation
 - Citizens Potawatomi Nation (Oklahoma)
 - Delaware Nation
- The NPS has prepared an AOE report for the proposed project and has sent it to DHR and the THPOs for review in conjunction with this EA.
- NPS has held two Section 106 consulting parties meetings, which occurred on May 27, 2021, and October 25, 2021. Consulting parties have reached a consensus that the Plan will result in adverse effects on historic properties. The consulting parties will negotiate a Programmatic Agreement (XXX) to identify specific stipulations and measures to mitigate the adverse effect.
- The NPS initiated Section 7 consultation via the USFWS's online Information for Planning and Consultation (IPaC) system on October 25, 2019. Ongoing consultation would occur during implementation of the proposed action.

- The NCPC reviewed the Plan concept on June 3, 2021 and provided comments. The NPS and the Foundation have submitted the Plan for Preliminary Review on December 2, 2021.

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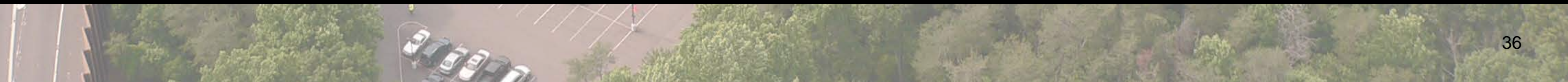
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Appendix: 1997 GMP Management Actions



WOTR 1997 GMP Management Direction	Planning Issue from GMP	Action Complete		Part of the GMP	NOTES
		YES	NO		
Overall Concept of The Preferred Alternative (Alternative 4)					
Provide sufficient parking for all visitors within the park boundaries without substantial additional paving or structures. Clear approximately 3 acres of forested area and regrade portion of adjacent grass parking areas. Repave and stripe existing parking areas to allow for maximum capacity. Pedestrian Ways for all grass parking would be formalized with lighted walkways for safe and orderly passage.			X	No	
Circulation					
Existing roadway network would continue to provide the major access to the park via the Dulles Toll Road from the south to Trap Road and via Leesburgh Pike (Virginia 7) from the north to Towlston and Trap Roads.	Circulation			No	
Continue to use existing main entrance road as access into park, but not as a through-way access.	Circulation	X		No	The proposed amendment will maintain the existing access
Remove spur that accesses Gil's Hill and reconfigure Barn Road into main pedestrian walkway to theater area.	Circulation	X		No	This is now an existing condition
Construct new vehicular paved access road along forested area on east edge of Gil's hill to facilitate traffic after performances, Theater in the Woods performances and daytime service deliveries.	Circulation			No	
Parking and Pedestrian Corridors					
The cost of metro stop would be prohibitive so the NPS would not rely on metro rail; actively promote ridership to or parking of private vehicles at the stops at Tyson's corner and Reston. From these locations, patrons would board Metro buses to the park; existing pedestrian walkways would be replaced with wider walkways to improve pedestrian safety.	Parking and Pedestrian Corridors		X	No	The proposed amendment will accommodate a shuttle connection to Metro
Expand and reconfigure Gil's hill, the Dust Bowl, and the dimple to accommodate more cars.	Parking and Pedestrian Corridors		X	Yes	
Fill in dimple and remove 3 acres of forest to the east of Gil's hill.	Parking and Pedestrian Corridors	X		Yes	
Cut, regrade, and stabilize Gil's hill, the dust bowl, and the dimple to reduce grade of the hill to accommodate more cars and reduce slippage of cars during inclement weather.	Parking and Pedestrian Corridors		X	Yes	Adjusting grade of dimple
Repave and restripe east and west lots to provide easier and more unified parking.	Parking and Pedestrian Corridors		X	Yes	Proposed amendment includes some restriping
Use directional signage to separate the parking areas into general, permit, accessible, employee and bus areas.	Parking and Pedestrian Corridors	X		Yes	
Locate emergency vehicle parking at the entrance of the accessible parking at the dimple lot.	Parking and Pedestrian Corridors		X	TBD	Parking for emergencies has been considered, but longer-term parking for emergency vehicles on standby during events has not been included
Use lighted concrete and flagstone walkways to guide patrons from parking areas to theater areas.	Parking and Pedestrian Corridors		X	TBD	This is not specifically included in plan
Provide cart service to the theater area from the west lot, the farthest parking area from the Filene Center.	Parking and Pedestrian Corridors	x		No	
Widen the walkway that extends from the east lot to the Barn Road.	Parking and Pedestrian Corridors		X	Yes	
Visitor and Patron Facilities					

WOTR 1997 GMP Management Direction	Planning Issue from GMP	Action Complete		Part of the GMP	NOTES
		YES	NO		
The maximum ticket sales capacity would be fixed at 7,000 (the current capacity), although up to 500 additional people from park or foundation staff, and those associated with performances are routinely present. the meadow would not be used to increase capacity of Filene Center performances.	Visitor and Patron Facilities	X		No	
An additional comfort station would be constructed adjacent to the concession stand on house right to increase capacity and serve disabled patrons who are seated at the back of new accessible covered house seating.	Visitor and Patron Facilities	X		No	
The Haybarn was determined to be unsuitable for conversion and would remain as storage or unused.	Visitor and Patron Facilities	X		No	Haybarn was removed and replaced circa 2003
Improvements made at Encore Circle at the log shelter and large deck at Wolf Trap Associates building for those who have made donations to benefit the park.	Visitor and Patron Facilities	X		No	In progress
Use of the Meadow was studied for construction of permanent or semi-permanent covered pavillions or tented areas for parties. Because of the visual importance of the Meadow to the preservtion of the country atmosphere, its distance from comfort stations,, and the desire to centralize high use activities, the Meadow is not recommended for more intense use than it currently experiences, nor should permanent structures be added. (an exception may be improvements to the existing concert shell in the cove located to the north of the meadow.	Visitor and Patron Facilities		X	TBD	The proposed amendment would add picnic areas along the edge of the Meadow, but would not expand performance space, etc. withing the meadow.
The Meadow would not be used to increase capacity of Filene Center performances.	Visitor and Patron Facilities		X	No	
Two facilities have been set aside for the use of those who have made donations to benefit WOTR - the Encore Circle and the large deck at the Wolf Trap Associates building - those improvements would remain.	Visitor and Patron Facilities	X		No	
Redesign the approach to the Filene Center and associated areas to allow for better function and appearance.	Visitor and Patron Facilities		X	Yes	
Remove box office building and ancillary buildings and replace with a single story structure to consolidate all patron and visitor functions.	Visitor and Patron Facilities	X		No	Completed 2008
Expand plaza and extend lawn seating to achieve more gentle angle.	Visitor and Patron Facilities		X	No	
Construct new Plaza Building (see map #21)	Visitor and Patron Facilities			TBD	Unclear which building/map is referened
Frequency of Performances and Duration of Season					
Expanded parking and improved infrastructure would not prohibit an increase in the frequency of performances or duration of the season.	Frequency of Performances and Duration of Season		X	No	
Education and Interpretation					
Implement recommendations described in the 1993 Interpretive Management Plan to the extent that staff and funds allow.	Education and Interpretation			No	<i>New Interp. management plan - 2011.</i>

WOTR 1997 GMP Management Direction	Planning Issue from GMP	Action Complete		Part of the GMP	NOTES
		YES	NO		
Work with Foundation and other potential partners to find additional sources of ideas and funds to complete plan program and media recommendations, and to develop additional activities to educate public about the performing arts.	Education and Interpretation			No	
Share talents with foundation to improve Wolf Trap educational and interpretive program.	Education and Interpretation			No	
Administration, Operations, and Safety					
The farmhouse would continue to be used for NPS administration of the park. No modifications would be undertaken.	Administration			No	
Relocate Administration, Operations, and Safety functions with a direct link to visitor and patron services, to the new plaza building (e.g. box office, press office, concessions, Ranger Services and park police).	Administration, Operations and Safety		X	TBD	Possible relocation of some functions with the park.
Retain other functions in existing locations (e.g. maintenance, administrative staff).	Administration, Operations and Safety	X		No	
Parking Area					
Total Parking: 3,104; Alternative 4, the preferred alternative, increases parking by 624 spaces from existing conditions.	Parking Area	X		Yes	Parking numbers will change, but in a different way than outlined
West Parking Lot: 900 spaces; East Parking Lot: 400 spaces, includes 10 for bus parking; East Lot (grass): Gil's hill, Gil's hill mass parking, and Gil's hill forest, total 1,100 spaces; Associates Lawn: 0 Parking area #3 (along stage road): 60 Tunnel Mass Parking: 0 Marquee mass parking: 0 Parking structure: 0	Parking Area			Yes	Parking numbers will change, but in a different way than outlined
<u>Permit/Accessible Parking</u> Dust bowl - 400 Dimple (Circle) - 0 Accessible Parking lot #1 - 50 Accessible Parking lot #2 - 50 (adjacent to Filene Plaza) Loading dock - 138 Filene Center drive thru - 6 Stage Road - 0	Parking Area		X	Yes	Parking numbers will change, but in a different way than outlined
Lighting Improvements					
An overhead pedestrian lighting system would be installed along all major pedestrian corridors; the lighting system would be designed to illuminate the sidewalks but not the internal roads. The lighting system would be designed with shielded luminaries that direct the light toward the ground.	Lighting Improvements		X	No	
Noise					
The park and the Foundation would strive to meet applicable noise regulations. Contracts with performers would continue to include agreements to adhere to maximum allowed decibel levels and penalties for violating them (Pg 68 in the WOTR GMP describes the Noise level measurements taken, and see notes in this table, column N).	Noise		X	No	Noise levels were measured in 1994 to identify traffic related noise on concert and nonconcert nights and concert noise during performances. Noisemeasurements were taken at 23 sites in the park, the Filene Center, and surrounding areas.
Cultural Resource Management (common to all alternatives)					
The Virginia SHPO has requested that additional research be conducted on the farmhouse and other components of the site to define the significance of these resources (GMP alternatives table, pg 52; also see my notes in this table column N).	Cultural Resuorce Management		In progress	Yes	Development is underway for a NR as an Historic District.

WOTR 1997 GMP Management Direction	Planning Issue from GMP	Action Complete		Part of the GMP	NOTES
		YES	NO		
To protect and preserve the ambience of the rural setting, the appearance and physical condition of the farm structures will be maintained. Any future additions within the area would be compatible with the feeling and visual setting of the farmstead, including, placement, architectural style, and color.	Cultural Resuorce Management	X		Yes	Anticipate this to be part of MOA
All structures open to the public would be made accesible to the public and park employees in accordance with the directives of the Americans with Disabilities Act.	Cultural Resuorce Management		X	Yes	Improvements would be made accessible
Furture collections acquisition may include artifacts that pertain to the performing arts; artifacts and archives would be exhibited and stored in appropriately controlled environments, and examined on a regular basis.	Cultural Resuorce Management		X	No	
The performances at WOTR are the basis of the cultural conservation resource in the park; A goal is to understand, appreciate, and maintain cultural diversity.	Cultural Resuorce Management			No	
Natural Resources (common to all alternatives)					
Under all alternatives, use of chemicals to pormote vegetative growth or control weeds or pests would be minimized. Integrated pest management and other nonchemical strategies would be used whenever feasible.	Natural Resources		X	No	
Boundary Adjustments					
The boundaries and size of the park are appropriate; no changes are proposed under any of the alternatives.	Boundary Adjustments	X		No	
Telecommunications					
Bell Atlantic Moile currently has a five-year lease for the placement of antennas on the roof of the Filene Center. Renewal of this use and decisions on future similar requests should be based on findings of no detrimental impacts, visual or operational, to Wolf Trap's character and performances.	Telecommunications	X		No	
Proposed actions located on the <u>Alternative 4 Legend and Map.</u>					
Landscape with Shrubs to screen West Parking Lot (1)	Parking and Pedestrian Corridors	X		No	
Narrow existing emergency access; construct small plaza with shelter and benches for cart pick-up (3)	Operations		X	No	
Redesign for pedestrian and emergency use only (4)	Parking and Pedestrian Corridors			Yes	
Install grass pavers that will support traffic (5)	Parking and Pedestrian Corridors		X	No	
Construct one lane paved access road for dinner tent and Associates deck delivery (8)	Operations			No	
Rehabilitate band shelter (11)	Visitor and Patron Facilities			Yes	

WOTR 1997 GMP Management Direction	Planning Issue from GMP	Action Complete		Part of the GMP	NOTES
		YES	NO		
Add lower deck to dinner tent for bistro clientele (13)	Visitor and Patron Facilities			No	
Design and construct plaza at end of pedestrian area for cart pick-up (15)	Visitor and Patron Facilities			No	
Relocate gated entry plaza (17)	Visitor and Patron Facilities		X	TBD	Unclear which gated entry plaza is referenced.
Construct Accessible / VIP entry plaza (18)	Visitor and Patron Facilities		X	Yes	

APPENDIX B: ACTION ALTERNATIVE GRAPHICS

The proposed Management Plan (Plan) for Wolf Trap National Park for the Performing Arts are shown in the following graphics.

FIGURE 1: GENERAL MANAGEMENT PLAN AMENDMENT

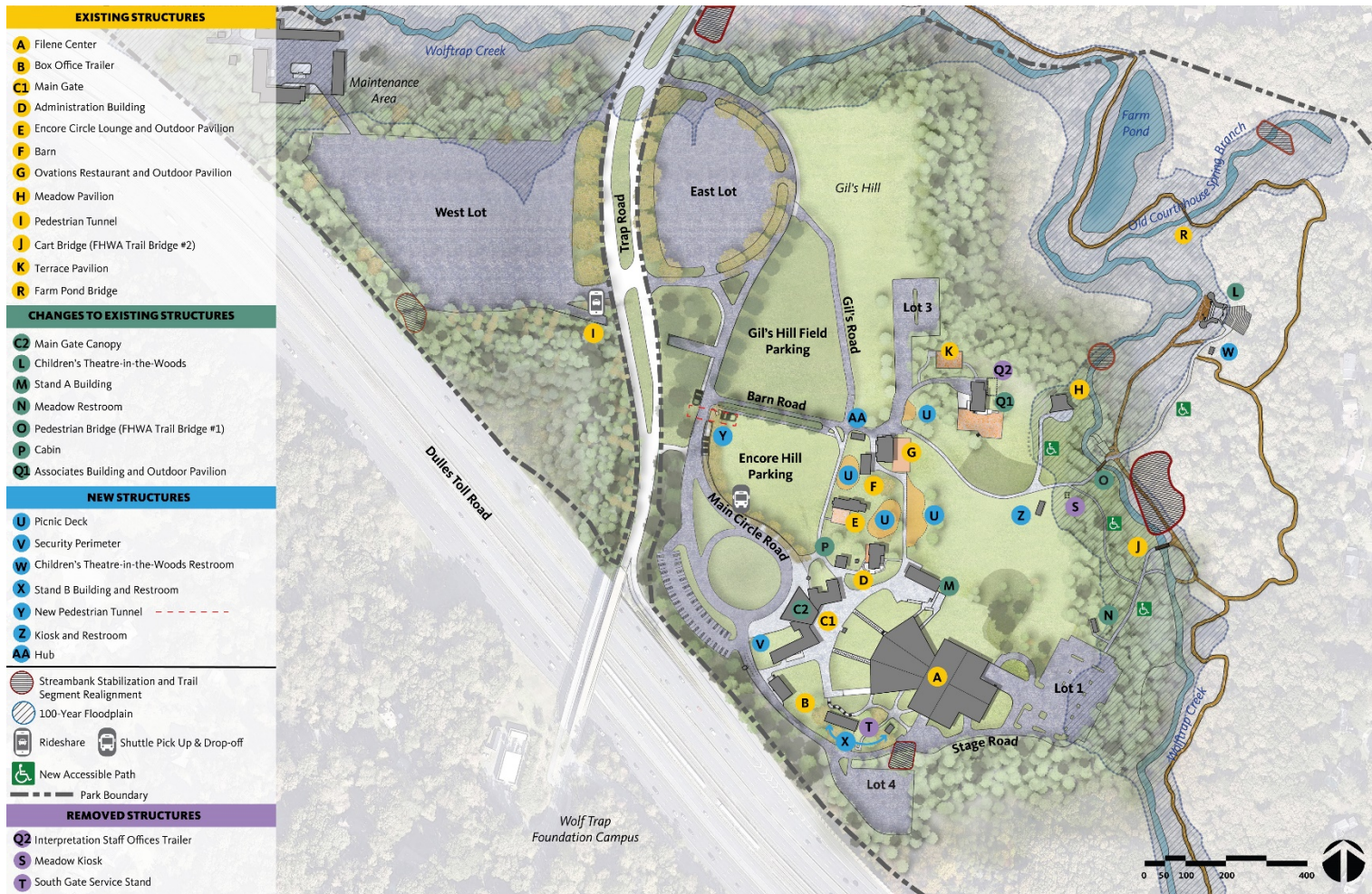


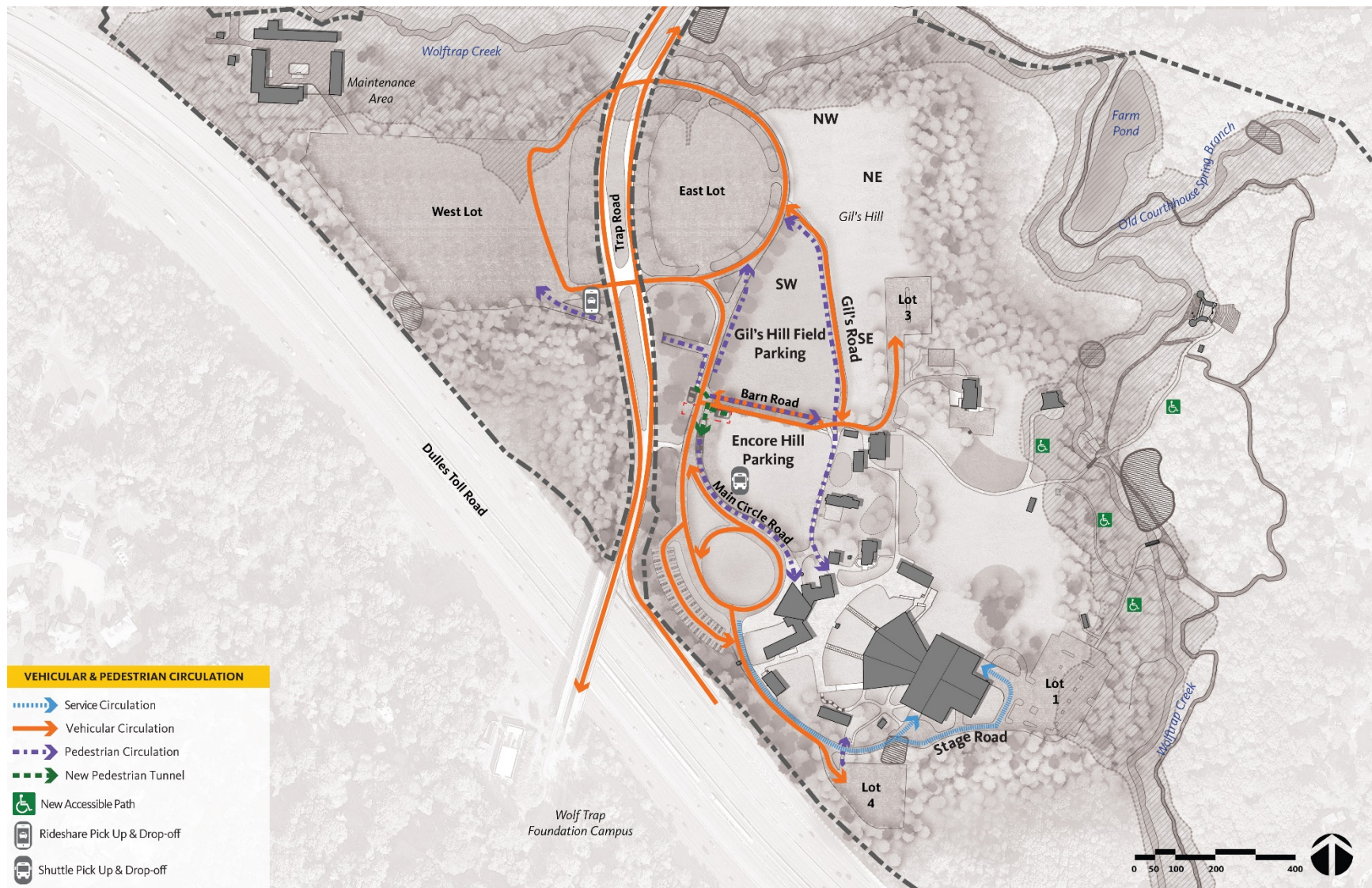
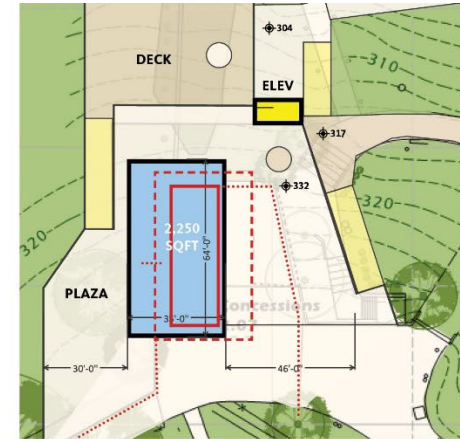
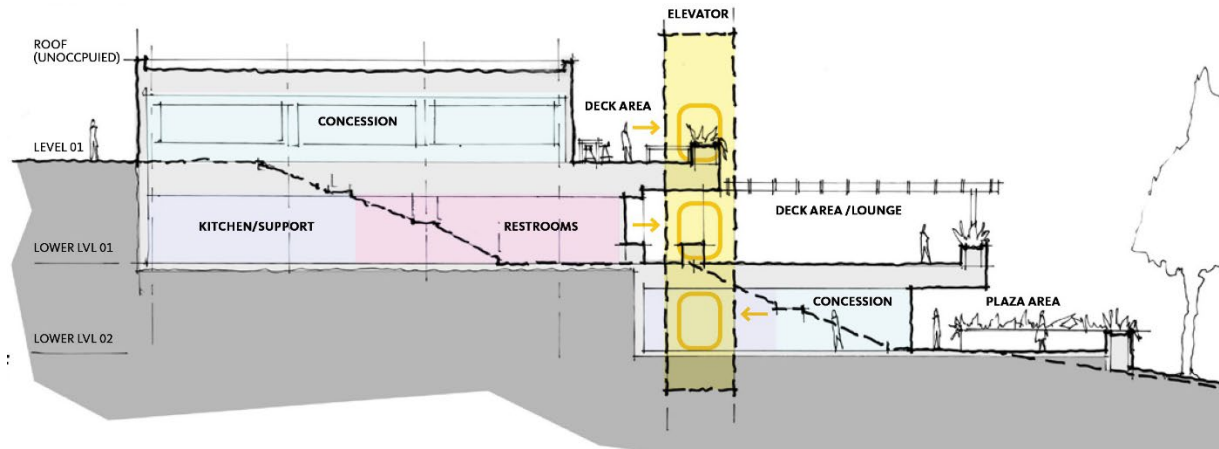
FIGURE 2: CIRCULATION WITHIN THE PARK

FIGURE 3: STAND A ELEVATION AND PLAN

Wolf Trap Master Plan Project Phasing Plan

Estimated Phasing Horizon

Near term: 1-3 years

Medium term: 4-7 years

Long term: 7+ years

Element	Location
Near Term	
Stand A replacement w/ elevator	Filene Center
New and replaced picnic facilities that are universally accessible	Farm Core
Medium Term	
Widening of lanes	Main Circle
Expanded Main Gate Canopy	Main Circle
Expanded Main Gate Plaza	Main Circle
Retained Metro shuttle pickup/dropoff	Main Circle
New walkway treatments	Main Circle
Widened pathways	Farm Core
New walkway treatments	Farm Core
New Barn Road walkway	Farm Core
New pedestrian tunnel	Farm Core
Associate's Building rehabilitation	Farm Core
New Meadow Kiosk and Restrooms	East
Meadow Restroom floodproofing	East
Realignment of eroded trails	East
New accessible trails	East
New Children's Theatre-in-the-Woods Restroom	East
Long Term	
New southern parking	Main Circle
Reconfiguration of Main Circle	Main Circle
Stand B addition w/ elevator	Filene Center
New Visitor Information Kiosk	Farm Core
Cabin Rehabilitation	Farm Core
Bridge replacements	East
Streambank stabilization	East
Meadow Pavilion replacement	East
Streambank stabilization	West
New stormwater management	West

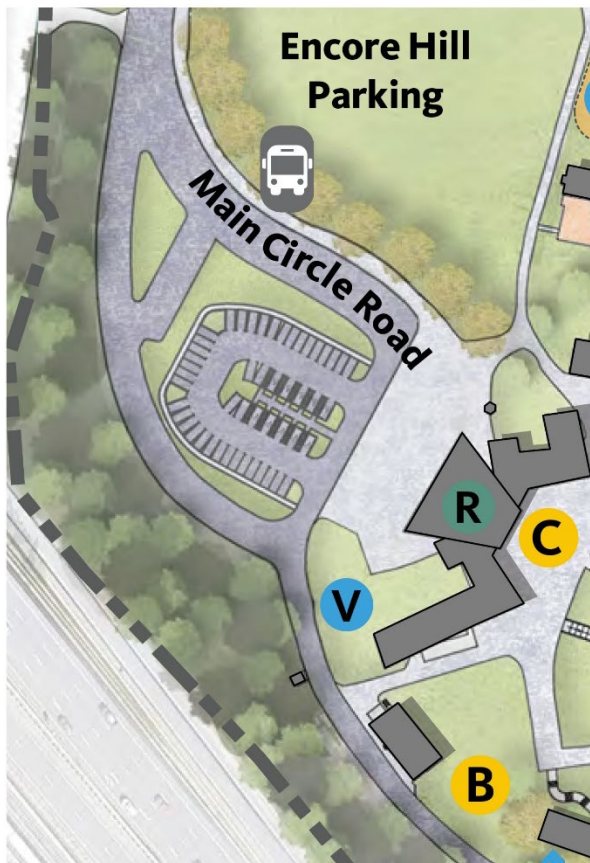
APPENDIX D: ALTERNATIVES CONSIDERED BUT DISMISSED

The NPS and Foundation considered a range of options for the GMP Amendment to address a variety of issues. The following alternatives were ultimately dismissed from further consideration.

MAIN CIRCLE ROAD: CENTER PARKING

The Main Circle Road: Center Parking alternative would replace the existing vegetated circle with an accessible parking lot (**Figure D- 1**). The alternative would require regrading and planting of vegetation to shield views of the parking lot from the approach to the Filene Center. This alternative was dismissed from further consideration because it would alter the view within the cultural landscape by altering the topography and interrupting the pastoral setting of the Filene Center.

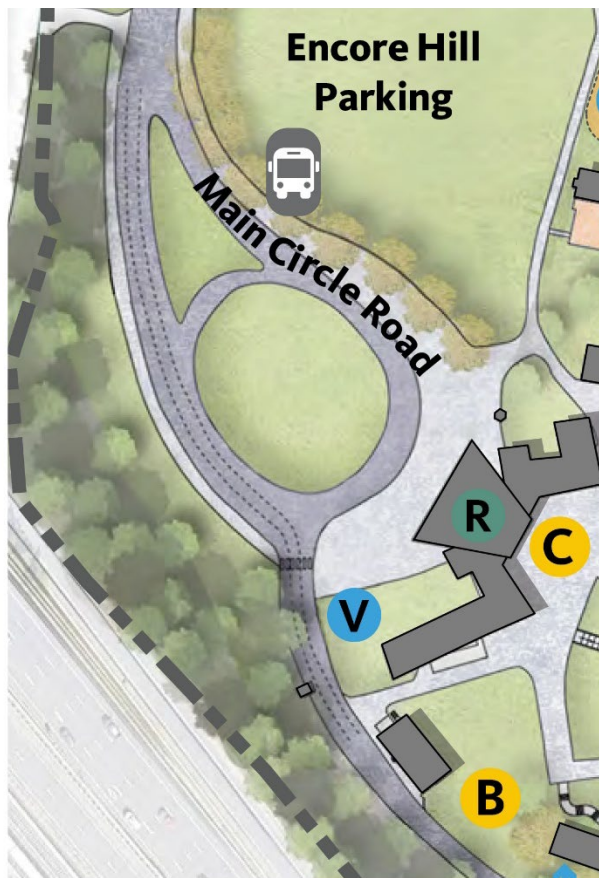
Figure D- 1: Center Parking Alternative



MAIN CIRCLE ROAD: REMOVED PARKING

The Main Circle Road: Removed Parking alternative would retain the existing vegetated circle and remove parking along Main Circle Road (**Figure D- 2**); this alternative would include the option of a future parking garage in Lot 4. The alternative would not increase the number of accessible parking spaces or improve accessible circulation in front of the Filene Center. The addition of a parking structure would be largely cost prohibitive and would not address accessible parking in the near term. This alternative was dismissed from further consideration because it did not meet the purpose and need of the project.

Figure D- 2: Removed Parking Alternative



REHABILITATED STAND A

The Rehabilitated Stand A alternative would rehabilitate Stand A in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties* in order to provide visitor services, such as restrooms and concessions. This alternative was dismissed from further consideration because the existing structure would be unable to adequately accommodate the visitor services needed.

LARGE-SCALE STAND A

The Large-Scale Stand A alternative would remove and replace Stand A with a new larger facility that included a rooftop deck, in addition to multiple restroom and concession areas (**Figure D- 3**). The new Stand A would be much larger and would not be compatible with the Filene Center development cluster. This alternative was dismissed from further consideration because the proposed large-scale Stand A would adversely affect the cultural landscape.

Figure D- 3: Large-Scale Stand A Alternative

