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## Memo To File

### A. Project Information

**Park Name:** George Washington Memorial Parkway (GWMP)

**PEPC Project Number:** 65603

**Project Title:** North Section Rehabilitation from Spout Run to I-495/Capital Beltway Environmental Assessment

**Project Location:**

**County, State:** Fairfax and Arlington Counties, Virginia

**Project Leader:** Caitlin Shinehouse

### B. Description of the Current Action (Project Description)

The project is currently undergoing final design development in preparation for implementation of the project. During the procurement of the design-build contract, the shortlisted teams received the government furnished plans and prepared a competitive technical proposal based on the scope of work. Upon award of the design-build contract, the selected technical proposal design plans were advanced to the preliminary design phase. The preliminary plan submission included the entire project scope and occurred in February 2022. Comments were received by stakeholders, including the National Park Service (NPS), Eastern Federal Lands Highway Division (EFLHD), and the Virginia Department of Historic Resources (VDHR). At this design stage, plans were approximately 30% complete, with many of the finer details left to be advanced via the design build contract. Many of the comments received were general in nature and consisted of requesting additional details of the project impacts and nature of the work.

### C. Description of Previous Compliance Documentation

**Decision Document Name:** Signed FONSI

**Decision Document PEPC ID:** 65603

**Decision Document Approval Date:** September 13, 2018

The National Park Service (NPS), in cooperation with the Federal Highway Administration - Eastern Federal Lands Highway Division (EFLHD) and National Capital Planning Commission (NCPC), prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to rehabilitate the north section of the GWMP from the Spout Run to Interstate 495 (I-495)/Capital Beltway interchanges. The proposed repair and rehabilitation of deteriorating aspects of the roadway were focused on improving safety along the roadway in a manner that balanced the preservation of the cultural and historical characteristics of the GWMP; the project is not meant to increase the existing Parkway traffic capacity.

The EA was released for public review from June 14, 2018, through July 14, 2018. The NPS issued a Finding of No Significant Impact (FONSI) for National Environmental Protection Act (NEPA) compliance in November 2018. The EA and FONSI were prepared in accordance with the National Environmental Policy Act of 1969 (NEPA), the regulations of the Council on Environmental Quality for implementing NEPA (40 CFR 1500- 1508), and NPS Director's Order# 12, Conservation Planning, Environmental Impact Analysis, and Decision making. In addition, the GWMP and Virginia Department of Historic Resources (VDHR) signed a Programmatic Agreement (PA) under Section 106 of the National Historic Preservation Act, which identifies mitigation measures to address the adverse effect being created by this project. The project design and construction will adhere to the conditions and mitigation measures outlined in the FONSI and the PA for protecting the environment and landscape,

preserving the historic character of the GWMP and meeting the Secretary of Interior's Standards for Treatment of Historic Properties per 36 CFR part 68.

Preliminary Design Plans were prepared by the Government for the project and were the basis for the impacts described in the NEPA documents that were completed. The impacts that were assessed in the EA, and the mitigation agreed upon in the PA, were based on the temporary widening of both the northbound and southbound lanes of the GWMP, repair and/or replacement of stone guard walls, as well as repairing drainage outfalls along the GWMP and Potomac River. These plans were then incorporated into a Request for Proposal issued for the procurement of a design build project.

#### **D. Justification for No Further Compliance**

During the preparation of the EA the overall designs for the project were preliminary and conceptual, and assumptions regarding the limits of disturbance (LOD) and other site-specific issues were needed to help predict the overall impacts the project would have on the natural and cultural resources of the GWMP. As the designs progressed through the design-build delivery model, the design-build team developed submission packages for advancing the plans to the intermediate milestone. This included the advancement of the design for the repair of specific bridges and the temporary widening work that is required in the median of the GWMP. As part of the technical proposal submitted by the selected team, a 3-lane maintenance of traffic (MOT) concept was proposed that features a reversible lane that alternates between the northbound and southbound direction depending on the time of day. For example, vehicles would have two lanes in the southbound direction in the AM rush hour and 2 lanes in the northbound direction during the PM rush hour. The major benefit of this MOT strategy is that it only requires temporary widening along the northbound lanes. This advancement in the design was not considered in the original EA, however, it reduces level of impact from approximately 15.33 acres (as stated in the original EA) down to approximately 9.45 acres (in the current design).

In addition to the advancement of the MOT strategy, designs were developed for the roadways, bridges, drainage, as well as the outfall repair treatments and the associated construction access that is required. Geotechnical and pavement field work was completed, which enabled the preparation of the geotechnical report and associated recommendations including proposed pavement sections. Nearly all of the survey and mapping work was completed, including a detailed tree survey that was done in two passes. The initial field work located all trees with a 12-inch diameter at breast height (dbh) or larger in the median and within a set offset of the GWMP. A second pass by the survey crews then located all trees with a 3-inch dbh or larger in the median. This was done to quantify impacts to trees in the median from the temporary lane widening. Coordination was done among the design-build team, EFLHD and NPS on the placement of temporary lane crossovers to lessen the impact on median vegetation.

The original survey from 2007 estimated tree removal of less than 15 trees with a dbh of greater than 20 inches. Once the project was awarded, and limits of disturbance were made official, a new tree survey was conducted in 2022. It found that approximately 70 trees with a dbh of greater than 20 inches will be removed as a result of the temporary lane widening for the North Section Rehabilitation project. The vast majority of tree removals (75%) will be trees less than 20 inches dbh (these trees were not listed in the original compliance).

It has been determined that the effects from the change of construction methodology will not result in new impacts. Rather this change is a reduction in impacts defined in the EA. As mitigation, individual trees requiring protection will be identified and appropriate barriers installed. Mitigation efforts as defined in the EA will still be followed (as described on page 58). "Following construction, herbaceous ground cover would be reestablished, and native trees and shrubs would be planted to compensate for any removal, as appropriate." Replacement of vegetation would be based on GWMP's original planting plans to maintain the original design intent for the median.

## **E. Conclusion**

I certify that the existing NPS NEPA document has been reviewed and there are no substantive differences between the current proposal and its associated environmental impacts and the proposal and impacts as described in the existing NEPA document and associated decision document.

**Superintendent:** \_\_\_\_\_ **Date:** 9/22/2022  
Charles Cuvelier  
George Washington Memorial  
Parkway