



## FINDING OF NO SIGNIFICANT IMPACT

### **Preserve Historic Peirce Mill Rock Creek Park**

The National Park Service (NPS) proposes to rehabilitate and reopen the historic Peirce Mill in Rock Creek Park as an operating, water-powered mill in order to meet the interpretive and educational missions of the park and to preserve an important historical resource associated with the development of the Washington, D.C. area. In addition to the rehabilitation work on the mill itself, site work is proposed to improve pedestrian access, provide accessible parking, and increase visitor safety on the site, being particularly mindful of the anticipated increase in use by school groups. The rehabilitation of the mill and its surrounding landscape as well as the reopening of the interior of the mill have been the subject of previous planning and study efforts to address its future use. This proposal was generally described and approved in the park's record of decision (ROD) for the general management plan/environmental impact statement (GMP/EIS) on June 6, 2007. The proposed rehabilitation of the mill and modifications to the site also draw upon information from the 2009 Peirce Mill Complex Cultural Landscape Report (CLR) as well as the Historic Structures Report prepared for the Friends of Peirce Mill and other material addressing the cultural resources of the area. The study area and the area of potential effect include the area immediately surrounding Peirce Mill and its associated structures and the landscape features including, but not limited to the adjacent barn and springhouse, as well as Grove 2 (east and north areas), Grove 1, and the former distillery now used as a private residence.

The proposed action is needed to improve the structural integrity of the mill, repair internal and external elements of the mill, and protect it against future flood damage. Access improvements to the site are needed to enhance public safety, provide universal accessibility, and restore the historic context at the site.

The NPS completed an Environmental Assessment/Assessment of Effect (EA/AoE) that provides an analysis of the environmental consequences of the alternatives considered for the resource protection and visitor accommodation projects. This EA was prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), its implementing regulations by the Council on Environmental Quality (40 CFR 1500-1508) (CEQ), and Director's Order 12, Conservation Planning, Environmental Impact Analysis and Decision-making, and accompanying Handbook. The document also is intended to be used in fulfillment of responsibilities under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and the procedures of the Advisory Council on Historic Preservation.

### **NPS SELECTED ALTERNATIVE**

The NPS alternative selected for implementation is Alternative B (the NPS Preferred Alternative). The selected alternative will include rehabilitation of the mill and its surrounding landscape; removal of the parking lot within the historic complex; modifications to the parking lot at Grove 1; a new bus drop-off area and driveway with two associated handicapped parking spaces; pedestrian path and trail reconfigurations; a new comfort station which will be constructed as part of a future project; and, as a result of consultation with the District of Columbia Department of Transportation (DDOT), the installation of traffic calming measures on Tilden Street, NW.

## **Mill Rehabilitation**

The stone walls of the mill will be re-pointed and repairs will be made to the existing louvers and siding. Repairs will also be made to the wood and stone lintels. Inside, the temporary shoring will be rebuilt so that only minor repairs to the original column and beam structural members will be necessary. Heating and ventilation improvements will be made; attic insulation, fire and security alarm systems will be added; and interior drains and sump pumps will also be installed within the mill to address the risk of potential flood damage associated with the mill's location. The basement door and windows on the south side of the mill will also be backed with water tight fittings to reduce the risk of damage by flooding from Rock Creek.

These actions will have an impact on some historic fabric, but such actions will be consistent with the Secretary's Standards for Rehabilitation of Historic Buildings, the Historic Structures Report prepared for the mill, and the measures agreed to by the District of Columbia State Historic Preservation Office (SHPO). Additionally, some localized ground disturbing activities will take place outside of the structure which will be associated with the installation and upgrade of utility service lines leading to the mill.

Outside, the existing headrace will be demolished and partially reconstructed to follow its historic alignment. An extended delineation of the historic headrace will be "ghosted" through the use and placement of stone pavers indicating the original trace of the headrace. This will result in ground disturbance in the immediate area around the headrace. These areas, as well as other locations adjacent to the mill, were subject to recent archeological surveys which determined that the ground had been severely disturbed by flooding and 20<sup>th</sup> century construction activities, thus impacting the context and site integrity of archeological resources.

The mill's water power system will also be modified to have a closed-circulation pumping system, creating a water flow sufficient to operate the re-installed mill wheel. A water collection pit and water mill sump pumps will be installed that will discharge into the newly constructed headrace. The closed circulation system will be refilled from the city water supply to replenish the water during drier seasons. Once the water has been used to turn the wheel, it will be returned to the sump pit and repumped to the headrace to repeat the circulation process. Excess water in the headrace from rainfall conditions will overflow into the tailrace. The sump pit will also include a sludge removal pump to facilitate the regular cleaning of the mill raceway system. The sludge removal pump will discharge into the tailrace, which will be cleaned on an annual basis to remove tree limbs, leaves, mud, algae, and other debris. In accomplishing this task, the tailrace is dewatered through evaporation or mechanical means, and a compact excavator (such as a Bobcat) is then lowered into the tailrace by crane so that the material in the tailrace can be scooped out and removed from the site. There will be no discharge of water into Rock Creek.

## **Pathways, Walkways, Site Restoration and Improvements**

A variety of site improvement actions will be taken to address bicycle and pedestrian conflicts, restore some historic landscape elements, provide for a reduction in potential safety hazards, and improve accessibility. The existing pathways around the Mill will be removed and a new pedestrian pathway system will be constructed to provide for an increased degree of separation between through-bicycle users and visitors to the site. A new pedestrian path from the existing Grove 1 parking lot to Tilden Street will also be constructed along the general route of an existing social trail to facilitate pedestrian traffic to the mill. New trails will be designed as pervious surfaces, thus reducing the total amount of pervious surfaces on the site from the existing surface coverage.

The existing parking lot to the northwest of Tilden Street, NW, will be removed so that a new, visitor-oriented gathering space can be constructed between the mill and the barn which will more closely reflect the original mill yard. This area will be used for visitor orientation and interpretation prior to tours of the mill and will help further isolate pedestrians from vehicles. A new accessible path will be constructed from the gathering space to the first floor of the mill. Another longer accessible path will be constructed, looping around the mill to the at-grade entrance to the basement on the other side. As part of a future project, a new, smaller comfort station will be constructed adjacent to the barn, in the same general area

as the existing comfort station which will be demolished since it is inaccessible, has not been maintained, and has been closed to the public for quite some time.

Approximately one quarter of an acre of ground will be disturbed through the development of an interpretive orchard. The installation of the orchard will restore a portion of the site to its historic use. The restoration of the orchard will result in the removal of the existing invasive and native plant species that have currently come to occupy the site. Demolition, construction, and re-grading activities will result in temporary soil and ground disturbance as well as removal of existing ground cover vegetation. An erosion and sediment control plan will be implemented during construction to reduce potential impacts from silt and associated run-off, and re-vegetation with NPS approved native plants will be undertaken once construction activity is completed.

### **Traffic, Parking, and Access**

The existing on-site parking lot located between the mill and barn will be demolished. The Grove 1 parking lot across the street will be expanded to compensate for the loss of on-site parking. Construction of a bus drop off east of the existing barn will allow for visitors, especially school or other organized groups, to visit the mill without crossing Tilden Street. Realignment of existing curbs and pedestrian paths will allow for a bus loop and two handicapped parking spaces west of the barn. Because testing for archeological resources has not been conducted in the area of the proposed bus drop-off and new driveway or orchard locations, a Phase I archeological survey will need to be conducted to determine if intact resources exist, and appropriate mitigations implemented if such resources are discovered.

In consultation with the DDOT, installation of traffic calming measures and crosswalks on Tilden Street will be undertaken. This will provide additional safety for persons crossing Tilden Street from the Grove 1 parking and will further encourage appropriately safe traffic speeds on Tilden Street. Overall accessibility will be improved by the installation of the ADA accessible trails, a vehicular (bus) drop off, two new handicapped parking spaces, and a new accessible comfort station which will be constructed in the future.

During construction of the proposed actions, a staging area will be set up to the north of the Grove 1 parking area. This area will be fenced during its use to protect visitors from construction related materials. Once the construction is completed, the area will be re-vegetated with NPS approved native plants.

### **Mitigation**

A variety of mitigation measures will be instituted as the actions are taken to implement this alternative. An erosion and sediment control plan will be implemented which will include the use of silt fences and hay bales to reduce erosion. Best management practices will be implemented to require the use of pads for construction equipment. Disturbed areas will be revegetated using native plants or species compatible with the historic landscape, as directed under NPS *Management Policies 2006*. Tree protection areas will be set up beyond the drip lines of trees to prevent the operation of heavy machinery within drip lines. Floodplain impacts will be minimized through removal of equipment during potential flood events. New site grading and modifications to the building, including installation of drains, sump pumps and water tight backing on the mill's basement windows and door, will reduce damage to the mill from potential flooding.

In order to minimize impacts to cultural, aesthetic, and visual resources, mitigation measures will include the following stipulations:

- All work on the Peirce Mill building shall be consistent with the "Secretary of the Interior's Standards for the Treatment of Historic Properties."
- Every effort shall be made to minimize hardscaping to retain the agricultural character of the site.
- A Phase I archeological survey will be conducted by the NPS in coordination with the DC SHPO in the area of the proposed bus drop-off and in the area of the proposed replanting of a portion of the historic orchard to determine if intact resources exist, and appropriate mitigations will be

implemented if such resources are discovered. In addition, archeological monitoring will take place in areas where the level of previous disturbance is not fully known.

- All efforts shall be made to screen the bus pull-off area with new plantings to minimize its visual intrusion onto the historic setting. All exterior building and site improvements are subject to review by the Commission of Fine Arts (CFA) and National Capital Planning Commission (NCPC), the DC SHPO.

## **OTHER ALTERNATIVES CONSIDERED**

In addition to the NPS selected alternative described above, the EA/AoE analyzed a no-action alternative and two other action alternatives.

### **Alternative A (No-Action)**

Alternative A would continue present management operations and maintain existing facilities at the site. The mill would continue to be closed to the general public and interpretation of the site would be limited to the exterior of the mill. Water operation of the mill would not occur, and the remainder of the site would continue to be available to support passive and active recreational activities.

### **Alternative C**

While most of the features described in the NPS selected alternative (Alternative B of the EA/AoE) would also be developed under Alternative C, there are several differences. The biggest difference is that the interior of the mill would be modified by the installation of an elevator between the first and second floors in order to provide for additional accessibility to the different levels of the mill. A retaining wall and patio would also be constructed outside the south door of the mill basement in order to protect the structure from floodwaters. This protection would be sufficient so that new water tight windows and door backing would not be necessary. However, the basement door would still be replaced, and inside a new ramp and stairs would provide access to the basement floor.

There would be a pathway constructed from the Grove 2 parking lot along the historic road alignment leading to a new enlarged vehicular area/pedestrian gathering space between the mill and the barn. A new pedestrian path would connect this gathering space to the barn and Tilden Street. Another new pedestrian path would provide access from the new handicapped parking spaces to Tilden Street. Two additional pedestrian paths would extend north and south from the new trail to provide access along the creek for pedestrians, without conflicting with the existing multiuse trail. Bus parking spaces would be provided along Shoemaker Street with an expansion of the road prism to allow for parallel bus parking. The existing parking area at Grove 1 would be expanded by seven spaces to provide for partial replacement of parking lost between the barn and mill areas. Under Alternative C, an additional, smaller gathering area would be constructed at grade, next to the mill and be connected to the larger gathering area by a series of new stairs. A new path would be extended from the mill entrance, along the side of the building to the new millrace.

Implementation of alternative C would result in additional impacts on the historic fabric of the mill as a result of the installation of the interior elevator. The impacts to the site would be different than those associated with Alternative B as a result of a different path system and the construction of the combined vehicle and handicapped access/pedestrian gathering area between the mill and the barn.

### **Alternative D**

Alternative D generally is similar to the other action alternatives, which would include improvements to the mill and its surrounding landscape, as well as parking lot modifications, pedestrian path and trail reconfigurations, a new comfort station, and traffic calming measures on Tilden Street.

The configuration of Alternative D specifically would differ from other alternatives by its installation of a new entrance drive and ADA compliant parking on the west side of the barn. Also, a wide path would be



constructed from the north Grove 2 parking lot to the area between the mill and the barn, forming a large gathering area. The gathering area would be connected to the barn and Tilden Street by a new set of stairs. A new path would run from the gathering area to the north side of the mill and continue to the new millrace. Another new path would connect to the new parking west of the barn.

Alternative D would include the same heating and ventilation improvements provided under Alternatives B and C. However, Alternative D would also include the installation of an air conditioning system to accompany the heating and ventilation improvements. Alternative D would not include the installation of the elevator between the first and second floors.

## **ENVIRONMENTALLY PREFERRED ALTERNATIVE**

In accordance with DO 12 and NEPA, the NPS is required to identify the environmentally preferred alternative in its NEPA documents. The CEQ defines the environmentally preferred alternative as the alternative that will best promote the national environmental policy as expressed in NEPA's Section 101. In their Forty Most Asked Questions, CEQ further clarifies the identification of the environmentally preferred alternative, stating "Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources." (Q6a).

The NPS has evaluated the impacts resulting from the different alternatives and has determined that Alternative B best meets the conditions that would qualify it as the environmentally preferred alternative. Alternative B best protects, preserves, and enhances the natural and cultural resources at the mill while improving the surrounding cultural landscape and repairing and opening the mill. This solution can be accomplished without imposing unnecessary adverse impacts on the historic structure, such as adding elevators or new stairwells proposed in Alternatives C and D. Alternative B also best promotes visitor safety at the site. Based on the analysis of environmental consequences and enhanced visitor safety, Alternative B is the environmentally preferred alternative.

## **WHY THE NPS SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As defined in 40 CFR Section 1508.27, the significance of an impact is determined by examining the following criteria:

***Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts, which require analysis in an Environmental Impact Statement (EIS):*** As described in the EA/AoE, there will be beneficial and/or adverse impacts to several park resources from the proposed actions; however no significant impacts were identified that would require analysis in an environmental impact statement. Impacts that will occur to the resource and were analyzed in the EA include:

**Soils and Topography:** Overall, there will be short-term and long-term minor adverse impacts to soils and topography as a result of the proposed construction activities and the installation of new impervious surfaces at the bus pull-off and parking areas. However, the total amount of impervious surfaces in the project area will be reduced as a result of the removal of the existing parking lot near the mill as well as by the use of pervious surfaces that will be installed in the new pedestrian walkways and in the gathering area in the mill yard. In addition, there will be long-term beneficial impacts as a result of these new pedestrian pathways since they will improve circulation through the site and will reduce the need for visitors to create social trails across the landscape.

**Vegetation:** There will be temporary and permanent losses of grasses, shrubs, and small trees associated with the removal of old impervious surfaces, the relocation of new impervious surfaces and new pervious walkways, as well as from activities associated with the extension of the headrace,

resulting in short-term and long-term minor adverse impacts to the vegetation found within the site. The development of the orchard will result in the removal of some invasive species and the re-planting of historically accurate vegetation, which will result in long-term beneficial impacts.

**Floodplains:** While there will be some changes to the location and amount of impervious surfaces within the floodplain, this change will not alter the conveyance of flood waters within the site, resulting in long-term, negligible, adverse impact. Work in the study area will involve the use and storage of machinery and equipment within the floodplain, which could alter the conveyance of flood waters, which could result in short-term minor adverse impacts. The potential for this to occur, however, is unlikely since the equipment and construction materials could be quickly removed if a flood event was anticipated. In addition, once the construction is complete, this equipment will be removed entirely and the staging area restored.

**Cultural Landscapes:** The selected alternative will result in long-term beneficial impacts to the cultural landscape, which was the subject of a recent Cultural Landscape Inventory and received a consensus determination from the SHPO for listing on the National Register of Historic Places (National Register). The cultural landscape will be improved through the removal of the parking lot from the immediate vicinity of the mill, the regrading of the site, the restoration of portions of the historic headrace, and the restoration of the historic orchard. There will, however, be short-term and long-term, minor adverse impacts on cultural landscapes, as construction equipment will be located in the landscape and a new feature (the bus drop-off) will be introduced. Overall, the selected alternative will result in a determination of “no adverse effect” under Section 106 of the NHPA.

**Historic Structures:** Peirce Mill is listed both individually and as a contributing feature within a Historic District on the National Register. Although there will be short-term minor adverse impacts during the construction phase of the project, restoration and rehabilitation of the mill’s interior and exterior features will result in long-term beneficial impacts to the historic structure; a determination of “no adverse effect” under Section 106 of the NHPA.

**Archeological Resources:** Most of the area that will be subject to ground disturbance has been surveyed for archeological resources. The areas around the mill and on the floodplain north and south of the structure are known to have little or no archeological significance. The areas to be used for the placement of the historic orchard and the bus drop-off will be subject to a Phase I survey prior to any ground disturbance. In addition, in areas where the degree of previous disturbance is not fully known, archeological monitoring will take place. As a result of the lack of known archeological resources on the site, and the efforts that will be taken to protect potential unknown resources, the overall long-term adverse impacts to archeological resources will be minor; a determination of “no adverse effect” under Section 106 of the NHPA.

**Aesthetics and Visual Resources:** Due to the visual intrusion of construction activities, the proposed actions will result in short-term moderate adverse impacts on aesthetics and visual resources. Long-term, beneficial impacts on aesthetics and visual resources will result from the improved appearance of the mill, removal of derelict visitor support structures from the historic core, and the re-planting of the historic orchard.

**Visitor Use and Experience:** The proposed actions will result in short-term, minor to moderate, adverse impacts associated with construction activities and long-term, beneficial impacts on visitor use and experience resulting from rehabilitation of the mill and its associated landscape.

**Park Operations and Management:** As a result of the selected alternative, during the construction phase of the project, NPS staff will be required to help oversee the construction process, maintain security around the construction site to ensure visitor safety, and address the public’s questions and concerns. These added responsibilities will result in short-term moderate adverse impacts to park operations and management. After construction is completed, there will be overall long-term beneficial impacts as overall maintenance will be reduced and interpretation will be enhanced.

***Degree of effect on public health or safety:*** The NPS selected alternative will have beneficial impacts to public health and safety for site visitors. Separation of pedestrian and through bicycle traffic will result in fewer visitor use conflicts and potential injuries. Redesign of the existing pedestrian pathway system will result in better visitor access to the site and also provide for increased levels of safe universal accessibility. Traffic and visitor conflict will be lessened through the construction of the bus access and formalized drop-off area. Additional designation of pedestrian crossings for Tilden Street and installation of traffic calming measures will enhance safety for visitors.

***Unique characteristics of the geographic area such as proximity to historic or cultural resources, parklands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:*** No prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas are located within the project area that will be subject to effects resulting from implementation of the selected alternative. The mill itself, as well as adjacent structures and the historic landscape, are listed in or eligible for listing in the National Register of Historic Places. In consultation with the District of Columbia SHPO, the NPS has applied the criteria of effect and determined that there will be a conditional no adverse effect under Section 106 of the National Historic Preservation Act on cultural landscapes, historic structures, or archeological resources from the NPS selected alternative subject to implementation of mitigation measures. The District of Columbia SHPO concurred with the determination on February 9, 2010.

***Degree to which effects on the quality of the human environment are likely to be highly controversial:*** No highly controversial effects in terms of scientific uncertainties as a result of the selected alternative were identified during the preparation of the EA or by the public during the public comment period.

***Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:*** No highly uncertain, unique, or unknown risks were identified during preparation of the EA/AoE or the public and agency review period.

***Degree to which the selected alternative may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:*** The NPS selected alternative neither establishes NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

***Whether the selected alternative is related to other actions with individually insignificant but cumulatively significant impacts:*** As described in Chapter 3 of the EA/AoE, cumulative impacts were determined by combining the impacts of the NPS selected alternative with other present and reasonably foreseeable future actions. Cumulative actions include additional improvements at Peirce Mill by the Friends of Peirce Mill, extension of the multiuse trail currently being planned by DDOT and the NPS, and continued implementation of the park's GMP. Impacts of the NPS selected alternative on soils and topography, vegetation, floodplains, cultural resources (cultural landscapes, historic structures, archeological resources), aesthetics and visual resources, visitor use and experience, and park operations and management were identified. The cumulative impact conclusions were reached for the following resource types:

**Soils and Topography:** The impacts to soils and topography from the execution of the DDOT Multiuse Trail and continued implementation of the park's GMP, when combined with the short-term and long-term minor adverse and long-term beneficial cumulative impacts on soils and topography from the selected alternative will result in both long-term, minor, adverse and long term beneficial cumulative impacts on soils and topography.

**Vegetation:** The short-term and long-term minor adverse impacts, along with expected long-term beneficial to vegetation within the site, when combined with the impacts to vegetation from the construction and operation of the DDOT Multi-use trail and the continued implementation of the park's GMP will result in both long-term, minor, adverse as well as long-term, beneficial cumulative impacts to vegetation.

**Floodplains:** The impacts of all the listed cumulative actions when added to those of the selected alternative will result in long term, negligible, adverse cumulative impact on floodplains.

**Cultural Landscapes:** Projects that will contribute to cumulative impacts on the cultural landscape include the additional improvements at the mill and the continued implementation of the park's GMP. The improvements at the mill will continue to return the site to its historic condition. This will include the installation of a new water wheel which will provide an important piece of the historic landscape, a long-term, beneficial impact. The continued implementation of the park's GMP will provide further protection and interpretation of the park's cultural resources. This will enhance the overall cultural landscape throughout the park, a long-term, beneficial impact. These impacts, when added to the impacts of the selected alternative will have both long-term beneficial cumulative impacts and long-term minor adverse cumulative impacts on cultural landscapes.

**Historic Structures:** The work that the Friends of Peirce Mill have done to improve the mill, including the proposed installation of a new water wheel, and the continued implementation of the park's GMP will result in greater protection and interpretation of the park's other historic structures. This improves the context in which the mill is viewed and interpreted, resulting in long-term beneficial impacts. These impacts, when added to those of the selected alternative will have long-term beneficial cumulative impacts on historic structures.

**Archeological Resources:** The continued implementation of the park's GMP will focus on improving park facilities, as well as protecting and interpreting archeological resources, which will in turn result in long-term beneficial impacts. As a result, the cumulative actions and implementation of the selected alternative will result in both long-term beneficial and long-term, minor adverse cumulative impacts on archeological resources.

**Aesthetics and Visual Resources:** The additional improvements to the mill, the DDOT Multiuse Trail, and the continued implementation of the park's GMP would improve visual resources across the park, improve the recognition of different sites and provide some visual connection between the mill and surrounding NPS sites, resulting in long-term beneficial impacts. These cumulative actions and implementation of the selected alternative will have a long-term, beneficial cumulative impact on aesthetics and visual resources.

**Visitor Use and Experience:** The cumulative actions, which include the additional improvements to the mill, the DDOT Multiuse Trail, and the continued implementation of the GMP in combination with the implementation of the selected alternative will have a long-term, beneficial cumulative impact on visitor use and experience.

**Park Operations and Management:** Long-term beneficial cumulative impacts will result from implementation of the selected alternative and the cumulative actions.

The impacts of the other present and reasonably foreseeable future actions on resources, in conjunction with the NPS selected alternative, will result in cumulative impacts ranging in intensity from negligible to moderate. Therefore, the NPS selected alternative will not contribute to or result in significant cumulative impacts.

***Degree to which the selected alternative may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:*** The NPS selected alternative will not cause the loss or destruction of significant historic structures or scientific resources. As noted above, the NPS has determined that the implementation of the selected alternative, based on specific conditions, will result in a determination of no adverse effect under Section 106 of the NHPA on cultural landscapes, historic structures, or archeological resources. The District of Columbia SHPO concurred with a conditional no adverse effect determination in correspondence dated February 9, 2010 (See attached correspondence). The specific conditions established that:

- All work on the Mill building shall be consistent with the Secretary of the Interior's Standards.
- Every effort shall be made to minimize hardscaping to retain the agricultural character of the site.



- Archeological investigations to determine if resources are present in areas not previously surveyed shall be carried out by NPS in coordination with the State Archeologist.
- All efforts shall be made to screen the bus pull-off area with landscaping to minimize its visual intrusion onto the historic setting.
- All final plans, including details such as paving materials and locations are subject to SHPO review.

***Degree to which the selected alternative may adversely affect an endangered or threatened species or its critical habitat:*** In a letter dated September 1, 2009, the U.S. Fish and Wildlife Service acknowledged that no federally listed or proposed threatened or endangered species under their jurisdiction are known to occur within the study area. A copy of this letter is contained in Appendix A of the EA/AoE.

***Whether the selected alternative threatens a violation of federal, state, or local environmental protection law:*** The NPS selected alternative violates no federal, state, or local environmental protection laws.

## **IMPAIRMENT OF PARK RESOURCES OR VALUES**

In addition to reviewing the list of criteria for significant impacts, the NPS has determined that implementing the NPS selected alternative will not constitute an impairment of park resources or values. This conclusion is based on a thorough analysis of the impacts described in the EA/AoE, agency and public comments received, and the professional judgment of the decision-makers in accordance with NPS *Management Policies 2006*. As described in the EA/AoE, implementation of the NPS selected alternative will not result in impairment of park resources or values whose conservation is (1) necessary to fulfill specific purposes identified in the park's establishing legislation, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified in the park's management plan or other relevant NPS planning documents as being of significance.

The selected alternative implements an element of the GMP for Rock Creek Park. The GMP recognizes the importance of Peirce Mill in the history and development of the District of Columbia and provides that the mill will be rehabilitated and interpreted to focus on the history of milling and land use in the area. While the selected alternative will result in short-term to long-term negligible to moderate adverse impacts on some of the park's resources (soils and topography, vegetation, floodplains, cultural landscapes, historic structures, archeological resources, and aesthetics and visual resources), these impacts are not key to the overall natural or cultural resources of the park, nor would these impacts hamper opportunities to enjoy the park. The impacts on Peirce Mill and the surrounding landscape will result in a preservation of the historic resources, restoration of important landscape features and relationships, and enhanced public interpretation of the role of the mill and its functions.

## **PUBLIC INVOLVEMENT**

This project was considered in the Final General Management Plan (GMP)/EIS for Rock Creek Park released in July 2005. Scoping for that document was begun in 1996 and continued until the Draft GMP/EIS was released in March of 2003. A Record of Decision (ROD) on the GMP/EIS was issued in June of 2007. The ROD determined that the NPS would "(R)ehabilitate the Peirce Mill complex to focus on the history of milling and land use in the area. This would expand on the already completed rehabilitation of the Peirce Mill Barn." Because of the relatively recent decision, and in light of the extensive scoping on the GMP/EIS, the NPS determined that additional public scoping would not result in additional or new issues to be addressed as part of this process. During the development of this proposal the NPS did consult with the Friends of Peirce Mill so that proposed actions and activities could be coordinated and potential concerns incorporated into the planning process.

The EA/AoE was made available for public review and comment on January 15, 2010, as announced through a press release; notice of availability letter and E-mail sent to the park's mailing list and neighbors of Peirce Mill; and the NPS' PEPC website. Forty copies of the EA/AoE were distributed to a variety of interested individuals, agencies, and organizations. A digital version also was available at <http://parkplanning.nps.gov>. Hard copies of the EA were also made available for public review at the Rock Creek Park Nature Center and Planetarium, Rock Creek Park's headquarters, and the National Park Service - National Capital Region Office.

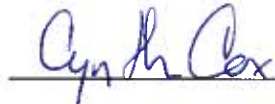
During the 30-day public review period (ending February 17, 2010 ), one comment correspondence was received on the NPS's PEPC web site from one unaffiliated individual who supported the proposal, but included some additional suggestions that while outside of the scope of this proposal, will be considered in future planning efforts at the site. Additional hard copy comments were received from the Friends of the Peirce Mill, District of Columbia Water and Sewer Authority, and the District of Columbia Office of Planning. The Friends of Peirce Mill supported the proposal, and identified some needed clarifications and corrections that are included in the errata for the EA. The District of Columbia Water and Sewer Authority identified locations of water and sewer lines that would need to be taken into account during any construction activities as well as future coordination that would be needed to ensure appropriate water and sewer connections. The District of Columbia Office of Planning also supported the proposal and identified several clarifications that are included in the errata for the EA. No changes to the selected alternative or the impact analysis were made as a result of public comments.

## CONCLUSION

In light of the impacts described in the EA/AoE for the project and with guidance from NPS *Management Policies 2006*, natural and cultural resources information, professional judgment, and considering agency and public comments, the NPS has decided to implement the NPS selected alternative, presented as Alternative B (NPS Preferred Alternative). Implementing the NPS selected alternative will preserve the historic Peirce Mill, improve visitor experience, accessibility and safety, open Peirce Mill to increased interpretation, and provide for additional public understanding of the history of the area.

The NPS selected alternative does not constitute an action that normally requires preparation of an EIS and, as noted above, impacts resulting from implementing the action will not have a significant effect on the natural, cultural, or human environment. There are no significant impacts on public health, public safety, threatened or endangered species, historic properties either listed on or eligible for listing on the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified during the impact assessment. Implementing the NPS selected alternative will not violate any federal, state, or local environmental protection laws. Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared. This is a finding of no significant impact.

**Recommended:**




Cynthia Cox  
Acting Superintendent  
Rock Creek Park

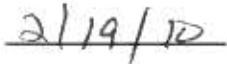


Date

**Approved:**



Peggy O'Dell  
Regional Director  
National Capital Region



Date

**PRESERVE HISTORIC PEIRCE MILL**  
**ROCK CREEK PARK**  
**ENVIRONMENTAL ASSESSMENT/ASSESSMENT OF EFFECT**  
**ERRATA**

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This errata sheet documents changes to the text of the Rock Creek Park, Preserve Historic Peirce Mill EA as the result of information provided since the document was released on January 15, 2010. Public comments on the EA were also reviewed by an interdisciplinary team to identify any substantive comments that require text changes to the EA. Substantive comments were considered to be comments that:

- Question, with reasonable basis, the accuracy of information in the EA.
- Question, with reasonable basis, the adequacy of environmental analysis.
- Present reasonable alternatives other than those presented in the EA.
- Cause changes or revisions in the proposal.

Additions to the text are identified by underlines and deletions are marked by strikeout unless otherwise noted.

**STUDY AREA DESCRIPTION**

**1. NEW MAP [PAGE 5]**

New Map (Figure 2.1) added to show property boundaries [Page 5]: See map at the end of this errata.

**2. REFERENCE TO NEW FIGURE 2.1 [PAGE 7, SECOND PARAGRAPH]**

The study area considered for the proposed action includes the mill, the adjacent parking lot, the Grove 1 parking lot, the system of pedestrian paths and trails that provide access through the site, and the surrounding lawn (see Figure 2). Property boundaries and other site features are shown on Figure 2.1.

**IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS AND  
CONSIDERATION**

**3. SOCIOECONOMIC RESOURCES AND ADJACENT LANDS [PAGE 16]**

The dismissal of socioeconomic resources and adjacent lands was expanded to include description of surrounding neighborhoods and potential impacts to properties administered by the District of Columbia; the following change was made:

The proposed action would neither change local and regional land use, local and regional land values, nor appreciably impact local businesses or other agencies. Implementation of the proposed action could provide a beneficial impact to the economy of the Washington, D.C. area through minimal increases in employment opportunities for the construction workforce and revenues for local businesses and government generated from construction activities and workers. Any increase, however, would be temporary and negligible, lasting only as long as construction.

Properties located immediately adjacent to the project area (comprised of mostly single-family dwellings and roadways administered by the District of Columbia Department of Transportation (DDOT)) may experience some short-term adverse impacts to local traffic during the construction phase of the project from increased truck traffic and possible long-term impacts resulting from the proposed cross-walk.

traffic calming measures, and increased bus use. These impacts however, would be negligible since the roads within the park and surrounding area would remain open during construction and any delays in transit time from increased truck traffic, pedestrians using the crosswalk, proposed traffic calming measures, and bus use would be short in duration and not appreciably affect transit time. Since any adverse impacts to both socioeconomic resources and adjacent lands resulting from the implementation of the proposed action alternatives would not be greater than negligible Therefore, the impact topic of socioeconomic resources and adjacent lands is considered but this resource topic was dismissed from further analysis.

## **ALTERNATIVES**

### **4. ALTERNATIVE B [PAGE 20, THIRD PARAGRAPH]**

The new headrace would extend up to approximately 65 feet following the course of the 1930s era millrace to a depth of 6 feet.

### **5. ALTERNATIVE B [PAGE 20, FIFTH PARAGRAPH]**

The basement door and windows on the southeast side of the mill would be replaced and backed with water tight fittings to mitigate potential future flooding.

### **6. ALTERNATIVE B [PAGE 23, THIRD PARAGRAPH]**

Pumps would be installed in the basement to support the future power supply for a new water wheel.

### **ALTERNATIVE B [PAGE 24, FIFTH PARAGRAPH]**

This area would be graded to prepare the top soil to support an orchard that would present vegetation similar to the historic orchard on the property.

## **MITIGATION MEASURES OF THE ACTION ALTERNATIVES**

### **7. TRAFFIC AND TRANSPORTATION [ADDED TO PAGE 33]**

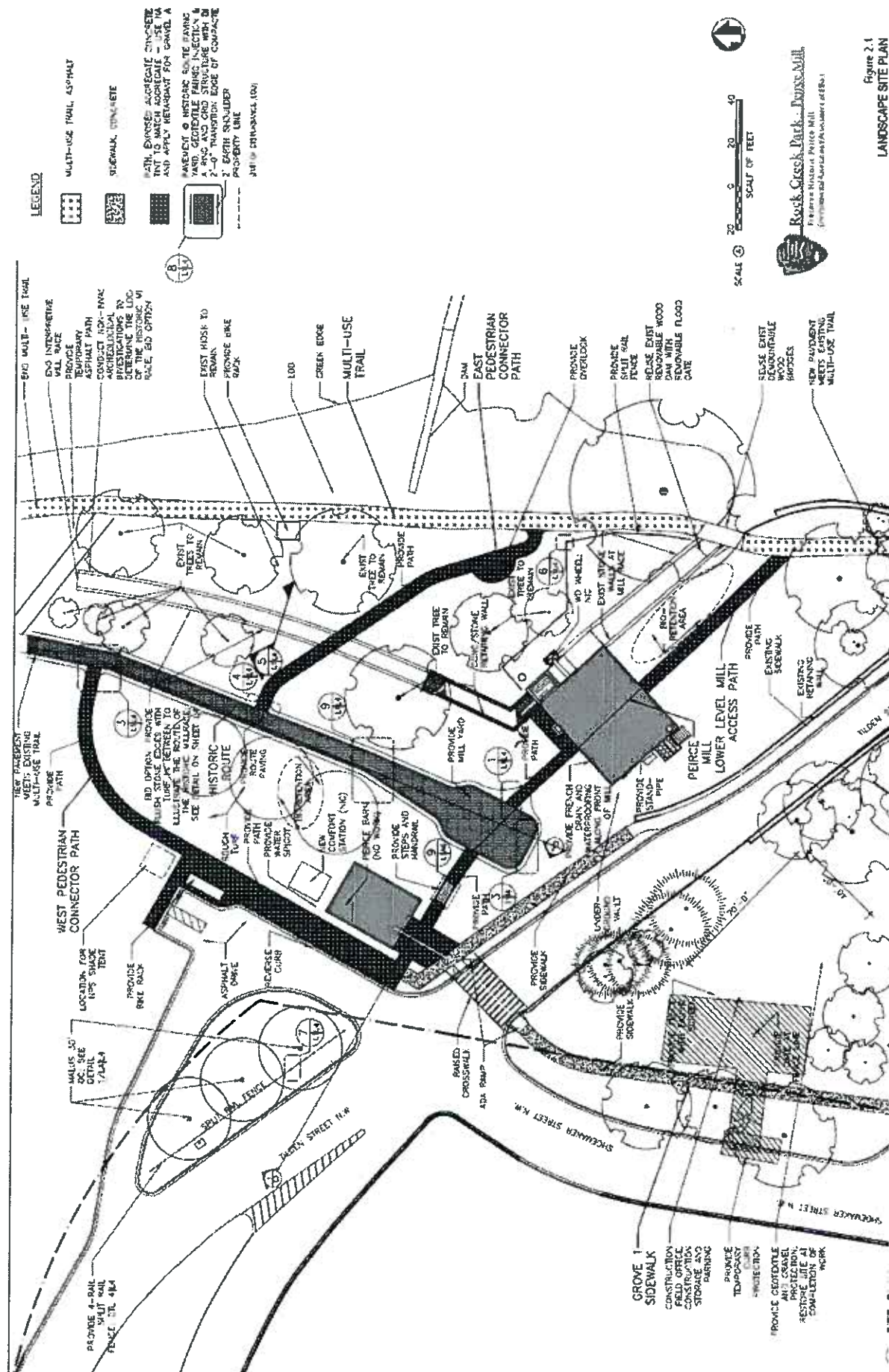
Bus service to the site will be on a scheduled basis only, with the limit of one bus on the site at a time. In the event that the arrival of scheduled busses overlap, excess busses would stage at the tennis facility located approximately 0.1 miles east of the mill on Park Road, NW. Busses will not be allowed to park or queue on any of the city roadways.

## **PHOTOGRAPHS OF EXISTING FEATURES**

### **8. PHOTOGRAPH 2 [PAGE 49, CAPTION]**

Photograph 2. Front (western side) of Peirce Mill. (Source: Quinn Evans Architects).





**Rock Creek Park  
Preserve Historic Peirce Mill EA/AoE  
NPS Response To Comments**

No.	Commenter	Date Received	Comment	NPS Response
1	DCOP	02/17/2010	While the eastern boundary of the project site is Rock Creek Park, to the immediate west of the site is a residential neighborhood. The EA does not include an assessment of the Peirce Mill site's adjacent urban context and treats the site as if it is surrounded entirely by park land.	Language was added to the dismissal of socioeconomic resources and adjacent lands (Page 16 of the EA) to include generalized description of properties not administered by the NPS, and the potential impacts associated with the proposed rehabilitation of Peirce Mill. Changes in the EA are reflected in the Errata.
2	DCOP	02/17/2010	In addition, the District's zoning map indicates that part of the project site is within a low-density R-1-A residential zone and covered by the Forest Hill Overlay District, Tree and Slope Overlay Protection District, and Diplomatic Overlay District. A summary of these zones and their specific regulations can be found on the DC Office of Zoning's website at <a href="http://www.dcoz.dc.gov">www.dcoz.dc.gov</a> . While it is unusual for federal park land to be zoned, the zoning maps maintained by the District clearly indicate that part of the area where the new driveway and bus drop-off is located is covered by zoning.	Federal land being used for Federal purposes is not subject to local zoning.
3	DCOP	02/17/2010	An evaluation of the impact of this project on the adjacent residential neighborhood should be conducted, even if it determines that the impact of the project is negligible.	Language was added to the dismissal of socioeconomic resources and adjacent lands (Page 16 of the EA) to include generalized description of properties not administered by the NPS, and the potential impacts associated with the proposed rehabilitation of Peirce Mill. Changes in the EA are reflected in the Errata.
4	DCOP	02/17/2010	In addition, the EA needs to acknowledge existing zoning and overlay districts that impact the site and determine whether or not they apply.	Federal land being used for Federal purposes is not subject to local zoning.

**Rock Creek Park**  
**Preserve Historic Peirce Mill EA/AoE**  
**NPS Response To Comments**

5	DCOP	02/17/2010	<p>A clear delineation of property lines is not included in the EA, making it difficult to determine what part of the bus drop-off area and new driveway are located on federal property and what is located within the road right-of-way under the jurisdiction of the District of Columbia. As an entrance into Rock Creek Park, Tilden Parkway has an unusually wide right-of-way and landscaped median. A map showing the location of the property line and adjacent road right-of-way should be included in the EA, as well as a summary of the potential impact of the project on land under the District's jurisdiction.</p>	<p>A map showing park boundary was added. See Errata.</p> <p>For summary of impacts, please see response to comment 3.</p>
6	DCOP	02/17/2010	<p>The District's formal Highway Plan also shows Broad Branch Road as a paper street that cuts through the center of the Peirce Mill site. The District's Highway Plan that shows Broad Branch Road is still in effect – although it is unlikely that it will ever be implemented. That being the case, Broad Branch Road should be acknowledged, even if it is only to indicate that the Pierce Mill project would not preclude implementing the Highway Plan in the event Broad Branch Road is ever needed.</p>	<p>No planned structures or improvements proposed in this plan will impede the future options of the District's Highway Plan.</p>
7	DCOP	02/17/2010	<p>Representatives from the District Department of Transportation (DDOT) and OP have reviewed the most recent construction documents and have the following comments on the proposed design. These changes may raise issues that need to be addressed in the EA:</p>	<p>See responses below.</p>
8	DCOP	02/17/2010	<p>A sidewalk is recommended along the north side of the new bus drop-off area, between the accessible parking spaces and Tilden Street</p>	<p>Given the exaggerated grade of the site, the additional construction required to accommodate a sidewalk north of the bus drop-off area while maintaining minimum slopes required by ADA would be cost prohibitive. Also, given the very low level of anticipated vehicular traffic in the drop off area and the Park's goals to minimize impacts to the historic site, a separate sidewalk does not appear to be warranted.</p>

**Rock Creek Park**  
**Preserve Historic Peirce Mill EA/AoE**  
**NPS Response To Comments**

9	DCOP	02/17/2010	The design of the bus drop-off area must leave enough space between the driveway and Tilden Street to allow for a future sidewalk and planting strip along Tilden Street	The proposed landscape design will allow adequate space for a future sidewalk and planting strip between the bus drop-off and Tilden Street..
10	DCOP	02/17/2010	Outstanding issues regarding a raised crosswalk or a pedestrian actuated signal across Tilden Street remain to be worked out with DDOT	The NPS will continue to work with DDOT to resolve all outstanding issues related to the raised cross walk and pedestrian actuated signal.
11	DCOP	02/17/2010	The existing and proposed multi-use trail along Rock Creek should have a minimum width of 10 feet as per AASHTO Guide for the Development of Bicycle Facilities	The portion of the multi-use trail being relocated as part of this project will be widened to 8 feet, the maximum width which can be accommodated by the existing bridge infrastructure and current park planning documents. The NPS recognizes that the reconstruction/potential widening of the multi-use path is the subject of a separate, on-going EA which may result in future changes to the path and infrastructure.
12	DCOP	02/17/2010	Bicycle parking should be added in multiple locations including areas adjacent to the multi-use trail near the existing kiosk, close to the main entrance of the barn, and across Tilden Street near the expanded parking lot	The schematic design only rudimentarily addressed bicycle parking. However, adequate, convenient, and well dispersed bicycle parking will be included in the final design for implementation.

13	DCOP	02/17/2010	<p>A new section of multi-use trail along Rock Creek should be included in the plan to show where it will cross the site to join the existing multi-use trail</p>	<p>The site plan included in the EA stopped south of the proposed connector between the existing and relocated portion of the trail. The connector will provide a suitable transition between the trails, maximizing efficiency and ensuring rider comfort, while minimizing possible soil disruption and impermeable surfaces.</p> <p>Please see Errata for expanded site plan.</p>
14	DCOP	02/17/2010	<p>Information on the expected volume of bus and vehicle traffic in the new bus turn around area should be expanded, as well as information on where buses will park after visitors are dropped off</p>	<p>Additional language was added in Traffic and Transportation: "Bus service to the site will be on a scheduled basis only, with the limit of one bus on the site at a time. In the event that the arrival of scheduled busses overlap, excess busses would stage at the tennis facility located approximately 0.1 miles east of the mill on Park Road, NW. Busses would not be allowed from parking or queuing on any of the local roadways."</p> <p>Please see Errata.</p>



**Rock Creek Park**  
**Preserve Historic Peirce Mill EA/AoE**  
**NPS Response To Comments**

15	DC WASA	02/18/2010	The proposed rehabilitation includes installing service lines and a fire suppression system in Peirce Mill. The Peirce Mill EA does not mention the size of the fire suppression system or the length of service connection to be used. Further coordination with DC WASA will be needed to determine which water main could be tapped for the installation of this system. Similar coordination will be needed if new services connections are needed for the new comfort station.	Comment noted: Coordination with WASA will continue throughout the rest of the design and construction phases of this project.
16	DC WASA	02/18/2010	The rehabilitation also included removing the existing Peirce Mill parking lot. Beneath the parking lot are two major sanitary sewers which carry millions of gallons of sewage per day. Information of the depths of the sewers were not available exactly below the parking lot; however, under the Grove 1 Picnic Area the 54-inch sewer is approximately 8 feet below ground. When removing the existing parking lot, care must be taken in not damaging these sewers. If damaged, the sewers could discharge sewage into the surrounding environment.	Comment noted: Coordination with WASA will continue throughout the rest of the design and construction phases of this project.
17	DC WASA	02/18/2010	The sanitary sewers are also located close to the proposed contractor staging and parking area. The load of construction equipment and vehicles could structurally damage the sanitary sewers.	Comment noted: Coordination with WASA will continue throughout the rest of the design and construction phases of this project.
18	DC WASA	02/18/2010	The reconstruction of the headrace includes an excavation to a depth of 6 feet. At its current location, this excavation would not affect the 54-inch sanitary sewer. However, if the excavation for the headrace is extended westward it could interfere with the sanitary sewer.	Comment noted: Coordination with WASA will continue throughout the rest of the design and construction phases of this project.

19	Robert L. Miller	02/17/2010	<p>Please add my support for the Preferred Alternative (B) as a planning guide for the Peirce Mill project, with a few caveats:</p> <p>For the past 18 years my family and I have been owner-residents on Linnean Avenue, about 12 houses away from the mill. I walk in and around the site area every week, and my wife, daughter and I have often bicycled along this stretch of Rock Creek. My daughter once gave a primary school birthday party at Peirce Mill. As an architect and amateur historian I have followed efforts to restore the working mill with interest, if not much substantive contribution.</p> <p>Your approach to history seems to me well taken: Peirce Mill is not really a time capsule of the 1820's but a layered slice of local culture, including the Adlum vineyards, the Peirces' slave-powered agribusinesses, the ersatz dam and (now gone) Edwardian teahouse, the New Deal restoration, the use of the former "Art Barn" as a spy loft near the former East Bloc embassies, and the past 20 or so years of relative official neglect. While your Alternative B is surely an enhancement, I suspect the current site condition plus a working mill and restrooms would offend almost no one. Keep it historic but keep it simple.</p>	Comment noted
20	Robert L. Miller	02/17/2010	<p>To bring all casual visitors from the Grove 1 parking area across Tilden Street at grade, as you show, is an idea that merits closer study. I often walk our dog across the Grove 1 field down to the waterside path, which, despite bike traffic, lets us avoid the at-grade crossing and offers a postcard view of the mill as we emerge from under the bridge. If this underpass were widened just enough for a separate, guardrail-separated walking path, I'm guessing it would appeal to many visitors. Frankly, I hope this could also help save the lovely, parkway-like sweep of Tilden Street from the ugly jerk of speed bumps. Adding a few parking spaces north of Tilden, among the apple trees, perhaps, might also help.</p>	<p>Comment noted. Tilden Street is under the jurisdiction of DDOT. Any additional modifications to the roadway, besides what were analyzed in the EA would require additional coordination between the NPS and DDOT.</p>

21	Robert L. Miller	02/17/2010	<p>You're to be applauded for working through all the environmental impacts of all four options, which must be even more exhausting to write than to read. Nevertheless, what I miss in this planning process is a consideration of "the next largest thing," both from a practical and an interpretive standpoint. Even a specific focus on the Peirce-Shoemaker history should consider how visitors will get a sense of the whole landholding and reach related landmarks like Linnean Hill. More broadly, as your map shows, the site is at the center of a remarkable neighborhood that includes Hillwood, embassies, jazz age mansions, fine modernist houses, and all the rich natural history of Rock Creek. The DC Office of Planning is now trying to get Forest Hills residents to come up with ideas for local sustainability initiatives. It would be great if the Park Service, as a major Forest Hills "resident," would propose something here say, a cooperative Metro shuttle to get visitors to and from your site and half a dozen other institutions nearby.</p> <p>Everyone in my family considers Peirce Mill a great asset and wishes you success and godspeed,</p>	<p>Comment is noted though it is beyond the scope of this proposal.</p>
22	Richard D. Abbott – President/Friends of Peirce Mill	02/12/2010	<p>In general, we find the presentation is very well done and that it makes a clear case for the proposed changes in Alternative B. We agree with the selection for Alternative B.</p>	<p>Comment noted.</p>
23	Richard D. Abbott – President/Friends of Peirce Mill	02/12/2010	<p>The plan deals effectively with access to the site by school children. However, the safety of visitors crossing Tilden from the Grove 1 parking lot will be a major concern. The plan shows a cross-walk over Tilden leading to the Barn and indicates traffic calming measures east and west of that point. We think that something more needs to be done to slow traffic coming down Tilden before rounding the curve toward the mill. We would suggest a flashing light and speed limit signs at a point before the turn, that is, uphill (west) of the turn.</p>	<p>Comment is noted though it is beyond the scope of this proposal. Tilden Street is under the jurisdiction of DDOT. Any additional modifications to the roadway, besides what were analyzed in the EA, would need to be carried out by DDOT.</p>
24	Richard D. Abbott – President/Friends of Peirce Mill	02/12/2010	<p>There is an inconsistency in the report which derives from the fact that the mill is not oriented according to the compass, but is more of a northeast/southwest orientation. We believe that this is the reason that on page 20 there is a reference to the basement doors and windows on the "south side". The doors and windows re on the creek side of the mill, toward the southeast, so this could have been made clearer.</p>	<p>The inconsistencies were corrected. Please refer to the Errata.</p>

**Rock Creek Park**  
**Preserve Historic Peirce Mill EIA/AoE**  
**NPS Response To Comments**

25	Richard D. Abbott – President/Friends of Peirce Mill	02/12/2010	Note that the pictures on page 49 refer to the west and east sides of the mill, which is the way we have always referred to it. To further confuse things, the second picture labeled as the back or eastern side is actually another photo of the west front.	Photograph 2 caption revised as follows: Photograph 2. Front (western side) of Peirce Mill. (Source: Quinn Evans Architects). Please refer to the Errata.
26	Richard D. Abbott – President/Friends of Peirce Mill	02/12/2010	Page 20, 3 <sup>rd</sup> para: It's not clear to us how the headrace length of 65 feet was measured. According to the B/B drawing A1, the headrace actually extends about 40 feet from the point of the turn, measured on the west side.	Text revised as follows: "The new headrace would extend up to approximately 65 feet following the course of the 1930s era millrace to a depth of 6 feet." Please refer to the Errata.
27	Richard D. Abbott – President/Friends of Peirce Mill	02/12/2010	Page 23, 3 <sup>rd</sup> para, next to last sentence: We don't understand the sentence: "Pumps in the deep pit adjacent to the flume would be installed in the basement to support the future power supply for a new water wheel". The pumps to re-circulate water to the wheel are located in the pump pit adjacent to the tailrace, not in the basement. The next sentence correctly refers to possible installation of drains and sump pumps in the basement.	Sentence revised as follows: "Pumps would be installed in the basement to support the future power supply for a new water wheel." Please refer to the Errata.
28	Richard D. Abbott – President/Friends of Peirce Mill	02/12/2010	Page 24, 5 <sup>th</sup> para: We question the need to re-grade the orchard area. It adds additional expense, and in any case the original orchard must have been on the same slope and soils and did fine.	Text was clarified to state: "This area would be graded to prepare the top soil to support an orchard that would present vegetation similar to the historic orchard on the property." Please refer to the Errata.

District of Columbia Office of Planning



February 9, 2010

Ms. Adrienne Coleman  
National Park Service, NCR  
Rock Creek Park  
3545 Williamsburg Lane NW  
Washington DC 20008-1207

**Re: Peirce Mill Rehabilitation**

Dear Ms. Coleman:

Thank you for your submission dated December 11, 2009; the Environmental Assessment/Assessment of Effects; and the construction documents, dated January 25, 2010. The District of Columbia State Historic Preservation Office (SHPO) enthusiastically endorses the National Park Service proposal to rehabilitate Peirce Mill and make it functional once again. As the city's last remaining mill, Peirce Mill, along with its industrial/agricultural neighbors, is a vital resource in understanding the city's heritage.

Necessarily, site improvements will occur with the rehabilitation of the mill to bring visitors safely to the site and make it accessible to all. These changes have the potential to create adverse effects upon the National Register-listed Mill complex. However, the DC SHPO finds that these potential effects can be avoided or minimized significantly if the following conditions are met:

- All work on the Mill building shall be consistent with the Secretary of the Interior's Standards.
- Every effort shall be made to minimize hardscaping to retain the agricultural character of the site.
- Archaeological investigations to determine if resources are present in areas not previously surveyed shall be carried out by NPS in coordination with the State Archaeologist.



- All efforts shall be made to screen the bus pull-off area with landscaping to minimize its visual intrusion onto the historic setting.
- All final plans, including details such as paving materials and locations are subject to SHPO review.

Please do not hesitate to contact me with any questions at 202-442-8842 or, for archaeology questions, please call Ruth Troccoli at 202-442-4438.

Sincerely,

A handwritten signature in cursive script, appearing to read "Anne O. Brockett".

Anne O. Brockett  
Architectural Historian

District of Columbia Office of Planning



Office of the Director

February 17, 2010

Harold Stone  
National Park Service  
Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, DC 20008

Re: Preserve Historic Peirce Mill EA

Dear Mr. Stone:

Thank you for the opportunity to provide comments on the Environmental Assessment (EA)/Assessment of Effects and the construction documents for Pierce Mill. As previously stated in comments sent to you from the District of Columbia State Historic Preservation Office (SHPO), the Office of Planning (OP) enthusiastically endorses the National Park Service's proposal to rehabilitate Peirce Mill and make it functional once again. As the city's last remaining mill, Peirce Mill, along with its industrial/agricultural neighbors, is a vital resource in understanding the city's heritage.

However, there are several affected environmental and environmental consequences that are not included in the EA that need to be considered as part of the Preferred Alternative B. These include an evaluation of the project within its urban context and its impact on adjacent neighborhoods; property boundaries of the park and recognition of project impacts on land under the jurisdiction of the District; and a review of how transportation systems for visitors arriving and leaving Peirce Mill by various modes will operate within and around the site.

Evaluation of Surrounding Urban Context and Land Use

While the eastern boundary of the project site is Rock Creek Park, to the immediate west of the site is a residential neighborhood. The EA does not include an assessment of the Peirce Mill site's adjacent urban context and treats the site as if it is surrounded entirely by park land. In addition, the District's zoning map indicates that part of the project site is within a low-density R-1-A residential zone and covered by the Forest Hill Overlay District, Tree and Slope Overlay Protection District, and Diplomatic Overlay District. A summary of these zones and their specific regulations can be found on the DC Office of Zoning's website at [www.dcoz.dc.gov](http://www.dcoz.dc.gov). While it is unusual for federal park land to be zoned, the zoning maps maintained by the District clearly indicate that part of the area where the new driveway and bus drop-off is located is covered by zoning.

An evaluation of the impact of this project on the adjacent residential neighborhood should be conducted, even if it determines that the impact of the project is negligible. In addition, the EA needs to acknowledge existing zoning and overlay districts that impact the site and determine whether or not they apply.



Definition of Property Boundaries, Lands under Jurisdiction of the District of Columbia, and Highway Plan

A clear delineation of property lines is not included in the EA, making it difficult to determine what part of the bus drop-off area and new driveway are located on federal property and what is located within the road right-of-way under the jurisdiction of the District of Columbia. As an entrance into Rock Creek Park, Tilden Parkway has an unusually wide right-of-way and landscaped median. A map showing the location of the property line and adjacent road right-of-way should be included in the EA, as well as a summary of the potential impact of the project on land under the District's jurisdiction.

The District's formal Highway Plan also shows Broad Branch Road as a paper street that cuts through the center of the Peirce Mill site. The District's Highway Plan that shows Broad Branch Road is still in effect – although it is unlikely that it will ever be implemented. That being the case, Broad Branch Road should be acknowledged, even if it is only to indicate that the Pierce Mill project would not preclude implementing the Highway Plan in the event Broad Branch Road is ever needed.

Pedestrian and Vehicular Circulation Within and Around the Site

Representatives from the District Department of Transportation (DDOT) and OP have reviewed the most recent construction documents and have the following comments on the proposed design. These changes may raise issues that need to be addressed in the EA:

- A sidewalk is recommended along the north side of the new bus drop-off area, between the accessible parking spaces and Tilden Street
- The design of the bus drop-off area must leave enough space between the driveway and Tilden Street to allow for a future sidewalk and planting strip along Tilden Street
- Outstanding issues regarding a raised crosswalk or a pedestrian actuated signal across Tilden Street remain to be worked out with DDOT
- The existing and proposed multi-use trail along Rock Creek should have a minimum width of 10 feet as per AASHTO Guide for the Development of Bicycle Facilities
- Bicycle parking should be added in multiple locations including areas adjacent to the multi-use trail near the existing kiosk, close to the main entrance of the barn, and across Tilden Street near the expanded parking lot
- A new section of multi-use trail along Rock Creek should be included in the plan to show where it will cross the site to join the existing multi-use trail
- Information on the expected volume of bus and vehicle traffic in the new bus turn around area should be expanded, as well as information on where buses will park after visitors are dropped off

Peirce Mill is one of the District's cultural treasures. The proposed plan is greatly needed to restore this historic resource and return it to its full potential as a place of learning and valuable tourist destination. The District of Columbia is confident that the issues raised here can be worked out, and we look forward to working with you. Should you have any questions, please contact Chris Shaheen of my staff at (202) 442-7616 or [chris.shaheen@dc.gov](mailto:chris.shaheen@dc.gov).

Sincerely,



Harriet Tregoning  
Director, Office of Planning

HT/cs/cgb

February 12, 2010

Ms. Cynthia Cox, Superintendent

Rock Creek Park

Dear Cindy:

Following are comments by the Friends of Peirce Mill on the Environmental Assessment of Peirce Mill:

1. In general, we find that the presentation is very well done and that it makes a clear case for the proposed changes in Alternative B. We agree with the selection of Alternative B.
2. The plan deals effectively with access to the site by school children. However, the safety of visitors crossing Tilden from the Grove 1 parking lot will be a major concern. The plan shows a crosswalk over Tilden leading to the Barn and indicates traffic calming measures east and west of that point. We think that something more needs to be done to slow traffic coming down Tilden before rounding the curve toward the mill. We would suggest a flashing light and speed limit signs at a point before the turn, that is, uphill (west) of the turn.
3. There is an inconsistency in the report which derives from the fact that the mill is not oriented according to the compass, but is more of a northeast/southwest orientation. We believe that this is the reason that on page 20 there is a reference to the basement doors and windows on the "south side". The doors and windows are on the creek side of the mill, toward the southeast, so this could have been made clearer.
4. Note that the pictures on page 49 refer to the west and east sides of the mill, which is the way we have always referred to it. To further confuse things, the second picture labeled as the back or eastern side is actually another photo of the west front.
5. Page 20, 3rd para: It's not clear to us how the headrace length of 65 feet was measured. According the B/B drawing A1, the headrace actually extends about 40 feet from the point of the turn, measured on the west side.
6. Page 23, 3rd para, next to last sentence: We don't understand the sentence: "Pumps in the deep pit adjacent to the flume would be installed in the basement to support the future power supply for a new water wheel". The pumps to re-circulate water to the wheel are located in the pump pit adjacent to the tailrace, not in the basement. The next sentence correctly refers to possible installation of drains and sump pumps in the basement.
7. Page 24, 5th para: We question the need to re-grade the orchard area. It adds additional expense, and in any case the original orchard must have been on the same slope and soils and did fine.

Sincerely yours,

Richard D. Abbott, President

**Keep Private:** No  
**Name:** Robert L. Miller  
**Organization:**  
**Organization Type:** I - Unaffiliated Individual  
**Address:** 4158 Linnean Ave NW  
Washington DC 20008  
Washington, District of Columbia 20008  
USA  
**E-mail:** rlma@comcast.net

#### Correspondence Information

<b>Status:</b> New	<b>Park Correspondence Log:</b>
<b>Date Sent:</b> 02/17/2010	<b>Date Received:</b> 02/17/2010
<b>Number of Signatures:</b> 1	<b>Form Letter:</b> No
<b>Contains Request(s):</b> No	<b>Type:</b> Web Form
<b>Notes:</b>	

#### Correspondence Text

Please add my support for the Preferred Alternative (B) as a planning guide for the Peirce Mill project, with a few caveats:

For the past 18 years my family and I have been owner-residents on Linnean Avenue, about 12 houses away from the mill. I walk in and around the site area every week, and my wife, daughter and I have often bicycled along this stretch of Rock Creek. My daughter once gave a primary school birthday party at Peirce Mill. As an architect and amateur historian I have followed efforts to restore the working mill with interest, if not much substantive contribution.

Your approach to history seems to me well taken: Peirce Mill is not really a time capsule of the 1820's but a layered slice of local culture, including the Adlum vineyards, the Peirces' slave-powered agribusinesses, the ersatz dam and (now gone) Edwardian teahouse, the New Deal restoration, the use of the former "Art Barn" as a spy loft near the former East Bloc embassies, and the past 20 or so years of relative official neglect. While your Alternative B is surely an enhancement, I suspect the current site condition plus a working mill and restrooms would offend almost no one. Keep it historic but keep it simple.

To bring all casual visitors from the Grove 1 parking area across Tilden Street at grade, as you show, is an idea that merits closer study. I often walk our dog across the Grove 1 field down to the waterside path, which, despite bike traffic, lets us avoid the at-grade crossing and offers a postcard view of the mill as we emerge from under the bridge. If this underpass were widened just enough for a separate, guardrail-separated walking path, I'm guessing it would appeal to many visitors. Frankly, I hope this could also help save the lovely, parkway-like sweep of Tilden Street from the ugly jerk of speed bumps. Adding a few parking spaces north of Tilden, among the apple trees, perhaps, might also help.

You're to be applauded for working through all the environmental impacts of all four options, which must be even more exhausting to write than to read. Nevertheless, what I miss in this planning process is a consideration of "the next largest thing," both from a practical and an interpretive standpoint. Even a specific focus on the Peirce-Shoemaker history should consider how visitors will get a sense of the whole landholding and reach related landmarks like Linnean Hill. More broadly, as your map shows, the site is at the center of a remarkable neighborhood that includes Hillwood, embassies, jazz age mansions, fine modernist houses, and all the rich natural history of Rock Creek. The DC Office of Planning is now trying to get Forest Hills residents to come up with ideas for local sustainability initiatives. It would be great if the Park Service, as a major Forest Hills "resident," would propose



something here—say, a cooperative Metro shuttle to get visitors to and from your site and half a dozen other institutions nearby.

Everyone in my family considers Peirce Mill a great asset and wishes you success and godspeed,

Robert L. Miller, FAIA



## **DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY**

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

February 18, 2010

Mr. Harold Stone  
National Park Service – Rock Creek Park  
3545 Williamsburg Lane, NW  
Washington, D.C. 20008  
***Re: Preserve Historic Peirce Mill EA***

District of Columbia Water and Sewer Authority Comments on Environmental  
Assessment for the Proposed Rehabilitation of Peirce Mill

Mr. Stone,

The District of Columbia Water and Sewer Authority (DC WASA) has reviewed and evaluated the Environmental Assessment (EA) for the Proposed Rehabilitation of Peirce Mill. The rehabilitation work to Peirce Mill and the other proposed modifications to the site will be in the vicinity of many existing utilities, as follows:

- Water:
  - 42-inch concrete water main underneath of Tilden St that continues north of the existing Peirce Mill parking lot
  - 8-inch cast iron water main underneath Tilden St
  - 8-inch water main underneath Shoemaker St
  - 16-inch cast iron water main that connects the 8-inch water main under Tilden St with the 42-inch water main.
  - 2-inch water main, which appears to be a service line to the existing comfort station.
  - 16-inch water main that extends from the 42-inch onto NPS property;
- Sewer:
  - 54-inch sanitary sewer on the east side of the existing Peirce Mill parking lot
  - 42-inch sanitary sewer on the west side of the existing Peirce Mill parking lot
  - 12-inch sanitary sewer on the southern side of Tilden St
  - 10-inch sanitary sewer underneath Shoemaker St that crosses under the existing Grove 1 parking lot
- Storm Water:

- 36-inch storm sewer northern side of Tilden St that passes by Peirce Mill and empties into Rock Creek
- 30-inch storm sewer underneath Shoemaker St that crosses under the existing Grove 1 parking lot and empties into Rock Creek
- 18-inch storm sewer underneath Shoemaker St that crosses under the existing Grove 1 parking lot and empties into Rock Creek

In every project review, DC WASA evaluates the following:

- Existing public water and sewer infrastructure that will be impacted by the proposed project;
- Ensures that the water and sewer pipes that will serve the proposed project have sufficient capacity for the intended use of the project;
- Determines whether the proposed project construction or the future existence of the proposed project could have a negative impact on the existing water and sewer infrastructure and, if so, how the infrastructure should be protected both short and long term;
- Age and condition of existing infrastructure so that DC WASA can determine if a water or sewer rehabilitation or replacement project should be coordinated with your project while the area is being disturbed;
- If there is a potential conflict with a planned water and sewer Capital Improvement Program project; and
- Other factors as may be appropriate for the specific proposed project.

In our review of the EA submittal we noted several issues of concern related to the water and sewer infrastructure. They are discussed below. Please note that this list is not all-inclusive and additional concerns are likely to surface as your project is further refined.

- The proposed rehabilitation includes installing service lines and a fire suppression system in Peirce Mill. The Peirce Mill EA does not mention the size of the fire suppression system or the length of service connection to be used. Further coordination with DC WASA will be needed to determine which water main could be tapped for the installation of this system. Similar coordination will be needed if new services connections are needed for the new comfort station.
- The rehabilitation also includes removing the existing Peirce Mill parking lot. Beneath the parking lot are two major sanitary sewers which carry millions of gallons of sewage per day. Information of the depths of the sewers were not available exactly below the parking lot; however, under the Grove 1 Picnic Area the 54-inch sewer is approximately 4 feet below ground and the 42-inch is approximately 8 feet below ground. When removing the existing parking lot, care must be taken in not damaging these sewers. If damaged, the sewers could discharge sewage into the surrounding environment.

- The sanitary sewers are also located close to the proposed contractor staging and parking area. The load of construction equipment and vehicles could structurally damage the sanitary sewers.
- The reconstruction of the headrace includes an excavation to a depth of 6 feet. At its current location, this excavation would not affect the 54-inch sanitary sewer. However, if the excavation for the headrace is extended westward it could interfere with the sanitary sewer.

Thank you for the opportunity to review this project at this early stage. The engineer assigned to this project is Mr. Craig Keenan. Craig can be reached at (202)-787-2366. Please continue to coordinate with Craig as your project moves forward.

We look forward to hearing from you shortly regarding this project.

Sincerely,



Jodye Levy Russell  
Supervisor, Planning

Enclosure

cc:

Craig Keenan  
Brian McDermott