FINDING OF NO SIGNIFICANT IMPACT
FOR
ROCK CREEK PARK
MULTI-USE TRAIL REHABILITATION
WASHINGTON, DC

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA), the National Park Service (NPS) and with the cooperation of the National Capital Planning Commission (NCPC) has prepared an Environmental Assessment (EA) to assess the potential effects of various alternatives for the rehabilitation of the Rock Creek Park multi-use trail in Washington, DC. Rock Creek Park is under the jurisdiction of the NPS, but implementation of the proposed action would be administered by DDOT and funded by FHWA. In accordance with the National Environmental Policy Act of 1969 (NEPA), Section 106 of the National Historic Preservation Act (NHPA), NPS Director's Order #12: *Conservation Planning, Environmental Impacts Analysis and Decision-Making* (NPS 2001), FHWA *Technical Advisory* (T6640.8a), and other applicable laws, regulations, and policies, an EA was prepared and was released for agency and public review on December 2, 2011. A public hearing was held on December 14, 2011. Subsequently, a Final EA and a Finding of No Significant Impact (FONSI) is prepared to fully address all agency and public comments received.

The proposed action includes the rehabilitation of a 3.7-mile segment of the Rock Creek Park multi-use trail from Broad Branch Road to P Street, NW; a 4,300-foot (0.8 mile) segment of the Piney Branch Parkway trail from Beach Drive to Arkansas Avenue, NW; a 1,929-foot (0.4 mile) segment of the Rose Park trail from P Street, NW to M Street, NW; a 363-foot ramp connecting the Rose Park trail to P Street, NW; and a new 1,247-foot (0.2 mile) paved trail segment from Broad Branch Road to Peirce Mill (referred to as the Peirce Mill Trail Spur). The proposed action includes resurfacing, trail widening where environmentally feasible, modifications to the trail alignments and road crossings, directional and interpretive signage, and connections to and from the trails to other pedestrian and bicycle facilities. The majority of the proposed improvements are located on NPS land, with some improvements located within District of Columbia right-of-way, and within the National Zoological Park property. The proposed action does not involve any transfer of ownership or change of jurisdiction of the trail or the land within the project area. Ownership of the trail and land within the project area will remain with the current owners.

The purpose of this action is to improve the overall condition and connectivity of the deteriorating Rock Creek Park multi-use trail system in order to enhance visitor use and experience within Rock Creek Park. The proposed action would result in improved visitor safety and experience and protection of park resources; improved access to the Rock Creek Park multi-use trail system from other pedestrian and bicycle facilities, as well as the surrounding neighborhoods; and more effective drainage and erosion control, thereby reducing trail maintenance. The proposed action would also include a number of spot improvements to more effectively separate trail users from vehicular traffic; to improve safety at roadway crossings; to improve sight distance at approaches and curves; to improve user accessibility; and to improve drainage and erosion control. In addition, a number of new connections to Rock Creek Park from the surrounding pedestrian and bicycle systems are proposed, as well as connections to and from the Piney Branch Parkway trail, within Rock Creek Park. The project is needed to improve safety conditions, protect park resources, and improve connectivity to the park from surrounding neighborhoods; to support the needs of diverse user groups who enjoy the trails and improve visitor experience; and to enhance opportunities for interpretation of park

history and resources. The proposed action would further increase connectivity and erosion control by creating the Pierce Mill Trail Spur and a formal link to the trail in Rose Park.

PREFERRED ALTERNATIVE

In accordance with the project objectives established to meet the project purpose and need, two action alternatives for the rehabilitation of the Rock Creek Park multi-use trail were developed. In addition to the action alternatives, two options for the visitor-made social trail from Broad Branch Road to Peirce Mill, and three options for the Rose Park trail were analyzed as part of the EA. The work being proposed for the Peirce Mill trail spur and the Rose Park trail options are included in the EA for the Rock Creek Park Multi-Use Trail Rehabilitation project to improve surrounding communities' access and connectivity to the Rock Creek multi-use trail: however, the implementation of any of these options would not affect the implementation of the work proposed for the Rock Creek Park multi-use trail. The options for the Peirce Mill Trail Spur and the trail in Rose Park that are selected as preferred would be implemented in conjunction with the Preferred Alternative for the Rock Creek Park multi-use trail. The No Action Alternative was also included in the analysis.

Preferred Rock Creek Park Multi-Use Trail Rehabilitation Alternative

Based on public comments and environmental analysis, DDOT in conjunction with FHWA and NPS identified Alternative 3: Trail Resurfacing and Widening, as the Preferred Alternative for the Rock Creek Park Multi-Use Trail Rehabilitation. Under Alternative 3, the Rock Creek Park multi-use trail would be resurfaced and widened to a maximum 10-foot width; the width will vary depending on environmental and physical constraints. Of the approximately 5.2 miles of trail resurfacing proposed under Alternative 3, 2.6 miles would be 10 feet in width. As discuss below, the proposed trail realignments, in certain areas, and other spot improvements would improve sight distance at approaches and curves, improve user accessibility, and improve drainage and erosion control.

The Piney Branch Parkway travel lanes are currently 12 feet wide and the Piney Branch Parkway Trail is 4.5 feet wide. By restriping this segment of the Parkway to 11-foot lanes, a six-foot trail would be achieved without creating a larger footprint. Depending on physical and environmental constraints, an approximately 50-foot segment of the Piney Branch Parkway Trail will be widen to separate trail users from vehicular traffic. Sections ranging from four to six feet wide would be located for a short segment along Piney Branch Parkway, through the Beach Drive tunnel, and along the connections to P Street, NW. A short segment from just north of Piney Branch Parkway to the National Zoo entrance will be widen to eight feet in width. The unpaved social trail connecting the Rock Creek Park multi-use trail to the Piney Branch Parkway trail would be paved to an eight-foot width. At the east end of the Piney Branch Parkway trail, the social trail along Arkansas Avenue will be resurfaced and will include new ADA sidewalk ramps that would tie into the existing sidewalks at 16th Street, NW and Taylor Street. Existing drainage features along the 50-foot segment, such as curb, will be shifted a maximum of two feet inward in order to accommodate the wider trail.

A new trail segment, which will separate trail users from vehicular traffic, will be constructed between the Broad Branch/Grove 2 North Parking Area and Rock Creek Park multi-use trail. The new trail will replace an existing social trail to the east of the parking area. The new trail segment will tie into the existing Rock Creek Park multi-use trail immediately south of the parking area.

Under the Preferred Alternative, the existing two-foot wide raised sidewalk along the west wall of the Beach Drive Tunnel will be widened to approximately four feet. To accommodate this widening within the existing tunnel, the vehicular travel lanes would be reduced from 12 feet in width to approximately 11 feet. In developed areas, where there are stringent controls on design, the use of 10-foot lanes is the minimum acceptable practice, according to the American Association of State Highway and Transportation Officials (AASHTO) guidance. Signage at the tunnel

approaches would alert drivers to the trail users ahead. Additionally, a barrier such as a low-profile guardrail will further alert drivers of the trail within the tunnel. Future NPS plans include replacement of the tunnel's existing lighting with LED lights. Light replacement is expected to be complete in 2014.

Under the Preferred Alternative, a new pedestrian bridge will be constructed south of the Beach Drive Tunnel immediately adjacent to the west side of the existing bridge. The proposed structure will be equal in length and style as the existing bridge, and will be constructed within five feet of the current bridge abutment. The five foot distance would allow for maintenance and future replacement of the vehicular bridge, if needed. The bridge materials would match the current concrete and stone aesthetics of the existing structure. The total width of the proposed bridge would be 12 feet, allowing for a 10-foot trail clearance. Currently, the Rock Creek Park multi-use trail crosses the bridge by way of a 3.5-foot raised sidewalk along the upstream (west) side of the bridge. Currently, sight distance at the Porter Street Bridge underpass is limited. However, physical and environmental constraints prevent realignment of the trail at this location. Under the Preferred Alternative, centerline stripping will be included at the approaches to this underpass to reduce potential user conflicts.

New crosswalks are proposed at Broad Branch Road to the north of the parking area entrance, and at P Street, NW to connect the existing sidewalks along the west end of the P Street ramp. The existing at-grade crosswalk on Jewett Street would be improved for trail user safety. In addition, the alignment of the crosswalk and approaches at the National Zoo entrance would be modified to create a shorter roadway crossing distance, as well as sight distance improvements for both trail users and vehicular traffic. On Beach Drive, north of Blagden Avenue, the existing sidewalk along the east side of the Beach Drive Bridge would be extended north to a new at-grade crossing to the existing trail to the north of Beach Drive. Another means of access to the trail network on Blagden Avenue is a sidewalk on the west side of Beach Drive. To connect sidewalks, a cross walk is proposed on Beach Drive south of Blagden Avenue. This sidewalk extension would give users an alternative way to gain access to Blagden Avenue and eliminate the need to traverse multiple roadway crossings on the east side of Beach Drive.

The Preferred Alternative also includes the construction of a new trail to connect the Rock Creek multi-use trail to the existing sidewalk along the Porter Street, NW ramp, and new trails along both sides of the P Street ramp to include a new crosswalk that would connect the existing P Street sidewalk, Rock Creek and Potomac Parkway trail, and Rose Park trail. The Preferred Alternative would also be compatible with the proposed trailhead at Klingle Valley.

Under the Preferred Alternative, minor trail realignments would improve sight distance and approaches along the trail to the south of Peirce Mill, to the south of Shoreham Drive, and at the approach to the Devil's Chair (Lyon's Mill) Bridge. In addition, minor grading is proposed for an approximate 180-foot segment of the multi-use trail, south of Calvert Street, to decrease the existing slope from approximately 12 percent to eight percent and improve user accessibility. Soil erosion and ponding conditions occur along an approximately 1,100-foot segment of the Rock Creek Park multi-use trail south of Peirce Mill. The Preferred Alternative includes raising the vertical profile of the trail to eliminate ponding, and stabilizing the slope between Beach Drive and this segment of the trail to improve soil erosion conditions. Additionally, restoration is proposed for a 45-foot timber retaining wall immediately adjacent to the trail. The wall is located approximately 100 feet northwest of the southern end of the Beach Drive tunnel. Deterioration of the wall is contributing to soil erosion conditions between the trail and Rock Creek. Under the Preferred Alternative, the timber retaining wall would be reconstructed to mitigate soil erosion. Another deteriorating wall is located in the project area along Piney Branch Parkway. It is anticipated that the wall will be evaluated and potentially stabilized under a separate project with the National Park Service and FHWA. This will occur prior to the rehabilitation of the Piney Branch Parkway trail.

Stormwater best management practices (BMPs) that meets DDOE requirements will be used under the Preferred Alternative to more effectively manage stormwater along the multi-use trail. Potential stormwater management

practices could include installation of bioretention areas could be included at some of the connections to DDOT right-of-way that would promote infiltration of stormwater in order to reduce its volume, improve its quality, and increase groundwater recharge. Other stormwater management techniques could include bioswales in order to reduce stormwater runoff. Bioswales could be constructed adjacent to the Broad Branch/Grove 2 North parking area, adjacent to the trail between the Beach Drive tunnel and Tilden Street, including the trail along Piney Branch Parkway, adjacent to the trail between Klingle Road and Shoreham Drive, including the parking areas, and adjacent to the trail between the P Street, NW bridge and Oak Hill Cemetery. The appropriate stormwater BMP that will be constructed or used at specific locations along the trail will be refined during the design phase of the project.

Preferred Peirce Mill Trail Spur

The preferred option for the improvements to the Peirce Mill Trail Spur is Option B. Under this option, the existing unpaved social trail from south of the Broad Branch/Grove 2 North parking area to the Peirce Mill parking area would be resurfaced to a standard eight-foot width. Trail material selection would be considered during the detailed design phase of the project. Prior to any land disturbing activities, tree protection measures, erosion and sediment control measures, and other BMPs would be installed. Archeological testing along the spur alignment will be conducted if deemed necessary by the National Park Service, National Capital Region's Regional Archeologist. Limited testing in the area was undertaken as part of the Peirce Mill Rehabilitation project in 2010-2011.

Preferred Rose Park Trail

The preferred option for the improvements to the trail at Rose Park is Option B. Under this option, the Rose Park trail, from P Street to M Street, NW, would be resurfaced along its current alignment to a six-foot width. A six-foot width is the standard width of a DDOT residential sidewalk and would be a zero to two-foot width increase along the length of the trail. The connection to the M Street sidewalk would follow the current alignment of the unpaved social trail as it deviates from the paved segment. Under Option B, a new safety railing would be constructed along the Rose Park Trail to provide protection from a steep embankment to the east. Existing chain link fencing in Rose Park would be removed to construct the railing, which would be comprised of timber posts and rails. Design of the new railing would match the character of other safety rails on the Rock Creek multi-use trail and would be consistent with AASHTO guidelines for shared use paths. The existing brick pathway connection to the M Street sidewalk would remain unchanged. Yield signs or speed limit signs could be installed in and around the park to calm traffic, and raise safety awareness on the trail. Special provisions would be considered to preserve the large oak tree at the Dumbarton Street playground area such as alternative trail materials and/or modifying the trail to accommodate the tree. Prior to any land disturbing activities, tree protection measures, erosion and sediment control measures, and other BMPs would be installed. Archeological testing along this alignment will be conducted if deemed necessary by the National Park Service, National Capital Region's Regional Archeologist Trail material selection would be considered during the detailed design phase of the project.

The total cost of the Preferred Alternative and options would range from $9,068,802 to $9,227,704. The duration of construction is anticipated to be 12 to 18 months. A complete description of the Preferred Alternative and options is provided in ***Chapter 2*** of the Final EA.

ALTERNATIVES CONSIDERED BUT NOT SELECTED

The EA also evaluated alternatives and options that were not selected as preferred. These include the No Action Alternative (Alternative 1) and one additional alternative (Alternative 2) for the Rock Creek Park Multi-Use Trail Rehabilitation, in conjunction with options to improve the Peirce Mill Trail Spur and the trail in Rose Park. Additionally, other alternatives and options were considered but not retained for detailed analysis in the Final EA.

Rock Creek Park Multi-Use Trail Rehabilitation Alternatives Not Selected

Under the No Action Alternative (Rock Creek Park Multi-Use Trail Alternative 1), the Rock Creek Park multi-use trail from the Broad Branch/Grove 2 North parking area to P Street, NW would continue to be maintained by the NPS. Neither the Rock Creek Park multi–use trail nor the Piney Branch Parkway trail would be rehabilitated, although basic maintenance such as spot repairs and debris removal would continue. The No Action Alternative was not chosen as the Preferred Alternative because it does not meet the project purpose and need.

Under Rock Creek Park Multi-Use Trail Alternative 2: Trail Resurfacing, the Rock Creek Park multi-use trail would be resurfaced at its existing variable (six-foot to 10-foot) widths. Trail material selection would be considered during the detailed design phase of the project. The unpaved social trail connecting the Rock Creek Park multi-use trail to the Piney Branch Parkway trail would be resurfaced to a six-foot width, and the Piney Branch Parkway trail would be resurfaced to a varying six-foot to eight-foot width, depending on physical and environmental constraints. Alternative 2 included all of the elements described above under the Preferred Alternative except that Alternative 2 did not include trail widening. Rock Creek Park Multi-Use Trail Alternative 2 was not chosen as the Preferred Alternative because it would not widen the trail and therefore would not resolve trail user conflicts and safety issues that are currently of concern.

Peirce Mill Trail Spur Options Not Selected

Under Peirce Mill Trail Spur Option A, the unpaved social trail south of the Broad Branch/Grove 2 North parking area to Peirce Mill would remain unchanged. No new construction would occur. This option will not meet the need to improve access to the Rock Creek Park multi-use trail system or to improve visitor safety and experience and protection of park resources. Option A was not chosen as the preferred Peirce Mill Trail Spur option because it does not meet the project purpose and need.

Rose Park Trail Options Not Selected

Under Rose Park Trail Option A, no new construction would occur along the four-foot to six-foot wide segment of the Rose Park trail between P Street, NW and M Street, NW. NPS would continue to maintain the trail in its existing state. This option will not meet the need to improve visitor safety and experience and protection of park resources. Option A was not chosen as the preferred Rose Park Trail option because it does not meet the project purpose and need.

Under Rose Park Trail Option C, the Rose Park trail, from P Street to M Street, NW, would be resurfaced along its current alignment to a standard eight-foot width, which is the minimum AASHTO recommended width for a multi-use trail (FHWA 2001). The connection to the M Street sidewalk would follow the current alignment of the unpaved social trail as it deviates from the paved segment. The existing brick pathway connection to the M Street sidewalk would remain unchanged. Prior to any land disturbing activities, tree protection measures, erosion and sediment control measures, and other BMPs would be installed. If necessary, archeology testing also would be performed. Trail material selection would be considered during the detailed design phase of the project. Option C was not chosen as the preferred Rose Park Trail option in consideration of nearby resident's concerns regarding the proximity of the widened trail to children's play areas and potential impacts to a large oak tree adjacent to the trail. More detailed descriptions of the trail alternatives and various options considered are provided in ***Chapter 2*** of the Final EA.

ANALYSIS OF SIGNIFICANT IMPACT

As stated in 40 CFR 1508.27(a), the analysis of significance as used in NEPA requires consideration of both the context and intensity of an action:

(a) Context. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

(b) Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:

- Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.
- The degree to which the proposed action affects public health or safety.
- Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.
- The degree to which the effects on the quality of the human environment are likely to be highly controversial.
- The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.
- The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.
- Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.
- The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.
- The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.
- Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

During the scoping process the project was determined to have no or negligible impacts to geology and topography, groundwater, surface waters, wetlands, floodplains, rare, threatened, and endangered species, scenic resources (aesthetics and viewsheds), museum collections, ethnography, socioeconomics, and environmental justice; therefore, these impact topics were dismissed from detailed analysis in the EA. The project would result in some adverse effects to the natural, cultural, and transportation environment based on the impact analysis presented in ***Chapter 4*** of the EA; however, the project would not result in significant impacts. A summary of these effects, and an evaluation of their significance per the CEQ guidance, is provided in the following paragraphs. A detailed analysis of these effects is provided in the EA.

Soils

The Preferred Alternative would result in short-term negligible adverse impacts to soil resources from construction and long-term beneficial impacts from the stabilization of social trails, discouragement of social trail use, and rehabilitation of existing paved trails. The preferred options for the Peirce Mill Trail Spur and the Rose Park Trail would result in short-term minor adverse impacts to soil resources during construction and long-term beneficial impacts due to the stabilization of disturbed soils and rehabilitation of the trail segment. Impacts to soils do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Water Quality

Under the Preferred Alternative and options, soil disturbance associated with construction activities would result in short-term negligible adverse impacts to water quality due to the increased risk of sediment transport into nearby water bodies during construction. Long-term beneficial impacts would occur under the Preferred Alternative based on improvements to drainage infrastructure. The preferred options for the Peirce Mill Trail Spur and the Rose Park Trail would result in long-term negligible adverse impacts due to the paving of each trail segment and the associated increase in impervious surface. Impacts to water quality do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Vegetation

Under the selected alternative and options, short-term minor adverse impacts will occur to vegetation in small localized areas during construction. Long-term minor adverse impacts will occur to herbaceous vegetation and potential impacts to large trees may occur from trail widening under the selected alternative. The preferred Peirce Mill Trail Spur and Rose Park Trail options will both result in long-term negligible to minor adverse impacts due to the loss of herbaceous vegetation and potential impacts to large trees. Impacts to vegetation do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Wildlife

The Preferred Alternative and options would have short-term negligible adverse impacts to aquatic resources from soil disturbance during construction and the associated increase in sediment transport to nearby water bodies. Long-term beneficial impacts to aquatic resources would result from soil stabilization, the rehabilitation of existing timber retaining walls, and improved drainage infrastructure. Short- and long-term negligible adverse impacts to terrestrial species would occur under the Preferred Alternative and options due to disturbances during construction and vegetation removal and the associated loss of terrestrial wildlife habitat. Impacts to wildlife do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Historic Structures and Districts

The Preferred Alternative and options would introduce additional paving within the project's Area of Potential Effect (APE) resulting in local direct long-term minor adverse impacts to the historic resources of Rock Creek Park and Rock Creek and Potomac Parkway. However, the actions proposed under the Preferred Alternative and options would not significantly diminish the overall integrity of any of the historic resources or cultural landscapes in the APE. The determination of effect for the Preferred Alternative and options for purposes of Section 106 would be *no adverse effect*. Impacts to historic structures and districts do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Cultural Landscapes

Impacts to the cultural landscape under the Preferred Alternative and options will be modest, and the historic alignments and characteristics of the trails and their cultural landscape setting would be appropriately treated to respect character-defining features of Rock Creek Park and of Rock Creek and Potomac Parkway. With the exception of the new trail along Piney Branch Parkway, all new trails would be introduced in short spans and would not significantly diminish the overall integrity of the historic resources or cultural landscapes within the APE. The preferred Peirce Mill Trail Spur option would result in a long-term beneficial impact due to the improvement of the deteriorated grounds where social trails exist. There would be additional long-term beneficial impacts created by utilizing the historic millrace alignment, which would help engage the public with the historic landscape patterns. There would be no effect on cultural landscapes from the implementation of the preferred Rose Park Trail option because Rose Park is not a component of Rock Creek Park's cultural landscape. The determination of effect for the Preferred Alternative and

options for purposes of Section 106 would be *no adverse effects*. Impacts to cultural landscapes do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Archeology

Trail widening and spot improvements under the Preferred Alternative and options would result in limited and localized ground disturbance activities. The preferred Peirce Mill Trail Spur option would result in the paving of an existing social trail within a known resource (51NW154) that has not been evaluated for listing in the National Register of Historic Places (NRHP). The preferred Rose Park Trail option would result in widening and repaving in areas that have not been surveyed for the presence of archeological resources. Avoidance, minimization, and mitigation within known archeological resources such as 51NW154, or as yet unidentified archeological resources, would result in *no adverse effect*. Impacts to archeology do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Visitor Use and Experience

Under the Preferred Alternative, short-term moderate adverse impacts to visitors would occur because construction would temporarily impede trail use and construction equipment and noise would detract from the park aesthetics and natural soundscape. However, the Preferred Alternative would result in long-term beneficial impacts to visitors based on overall improvements because the trail would be smoother and more aesthetically pleasing, and trail widening would reduce the potential for user conflicts. The preferred Peirce Mill Trail Spur option would have a long-term beneficial impact as trail users of multiple types would be given another trail option to experience the park's resources, and the preferred Rose Park Trail option would result in a long-term beneficial impact because safety issues would be mitigated by the trail resurfacing, widening, and access provided by new connections. Impacts to visitor use and experience do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Human Health and Safety

The Preferred Alternative and options would result in short-term negligible adverse impacts during construction. Long-term beneficial impacts would result under the Preferred Alternative from improved separation of trail users from vehicular traffic, improved roadway crossings, trail resurfacing, minor realignments, and trail widening. The preferred Peirce Mill Trail Spur option would have long-term beneficial impacts to human health and safety because resurfacing the social trail would provide safe access to a wider variety of users, including wheelchair users. The preferred Rose Park Trail option would have a long-term beneficial impact from the addition of paved connections and resurfacing. Impacts to human health and safety do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Park Operations and Management

Under the Preferred Alternative and options, trail improvements, detours and closings, and maintenance of traffic (MOT) would be conducted by DDOT. DDOT would implement temporary traffic controls along the trail and at road crossings as needed. Overall, the construction of the trail will be relatively simple, will be completed by small groups of workers, and will require relatively small equipment and machinery. Construction of the bridge will have short-term minor adverse impacts. DDOT will perform all of the temporary trail closings, MOT, and trail rehabilitation. During construction, short-term, minor adverse impacts to park operations and management will occur to NPS staff resources under the selected alternative and options because of their participation in the planning and coordination efforts. Implementation of the Preferred Alternative would result in long-term beneficial impacts to park operations by reducing the maintenance needs of the Rock Creek Park multi-use trail. The preferred Peirce Mill Trail Spur option would have a long-term minor adverse impact from the additional maintenance required for the newly paved trail spur.

The preferred Rose Park Trail option would have a long-term beneficial impact due to the reduction in maintenance needs of the trail. Impacts to park operations do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Traffic and Transportation

The Preferred Alternative would result in short-term moderate adverse impacts from temporary inconveniences caused by road and trail detours and closings and extended travel times. Long-term beneficial impacts would occur as a result of the Preferred Alternative due to reductions in user conflicts between trail users and motorists, and enhanced connectivity between the trail system and surrounding bicycle and pedestrian networks. The preferred Peirce Mill Trail Spur option would result in long-term beneficial impacts by providing trail users with additional access to Rock Creek. The preferred Rose Park Trail option would result in short-term moderate adverse impacts due to detours and temporary trail and roadway closures during construction, but long-term beneficial impacts would result due to the additional access to M Street. Impacts to traffic and transportation do not meet the level of "significance" per the CEQ definition, and would not require a higher classification of NEPA documentation or study.

Section 106 Determination of Effects

Based on the criteria of adverse effect and potential effects, under Section 106, of the build alternatives on the integrity of each property and on consultation with the DC SHPO office, FHWA has determined that the Rock Creek Park Multi-Use Trail Rehabilitation project will have "no adverse effect" on historic properties and archaeological resources as defined by 36 CFR 800. Prior to implementation of the project, FHWA and DDOT will ensure the following:

- DC SHPO will be provided an opportunity to review and comment on the additional information such as maps, plans,, and detailed project descriptions that defined the undertaking in more details; and
- In consultation with the DC SHPO, DDOT shall conduct archaeological survey in all locations where ground disturbance if previously unsurveyed areas are proposed and any locations warrant testing for the presence of potentially significant archaeological resources.

Based on a letter to DDOT, dated 19 October 2011, DC SHPO concurred with the FHWA determination that the project will have "No Adverse Effect" on historic properties and archeological resources as defined by 36 CFR 800.

Section 4(f) Resource

Rock Creek Park is national public park and as such, is afforded special protection by legislation including Section 4(f) of the U.S. DOT Act of 1966, the National Park Service Organic Act, and the 1890 Rock Creek Enabling Legislation. Rock Creek Trail is an existing trail and will continue to be owned and maintained by NPS. The trail is a contributing element to the Rock Creek Park and Rock Creek and Potomac Parkway historic district. For the Rock Creek Park Multi-Use Trail Rehabilitation Project, no land will be permanently incorporated into a transportation facility with either of the action alternatives, including the Preferred Alternative. Although the Rock Creek Park Multi-Use Trail Rehabilitation Project will involve temporary occupancy of park resources, the project has been determined to have "No Adverse Effect under Section 106; therefore, it does not involve the use of a Section 4(f) resource. Furthermore, according to the 2004 Cooperative Agreement between the National Park Service, the DC Department of Transportation and the DC Department of Parks and Recreation for the rehabilitation of Rock Creek Park multi-use trail and the Rose Park trail, this project is funded through the Recreational Trails Program. Under 23 CFR 774.13 and 23 CFR 774.17, the Rock Creek Park Multi-Use Rehabilitation Project will not use a Section 4(f0 resource and is applicable for an exception; therefore the project is legislatively exempt from the requirements of Section 4(f).

MITIGATION MEASURES

The following mitigation measures would be implemented to mitigate or minimize adverse impacts of the Preferred Alternative and options:

Soils

During the design phase of the project, erosion and sediment control plans would be prepared in accordance with the DDOE current *Standards and Specifications for Soil Erosion and Sediment Control*. These plans would include specific measures and BMPs to avoid and/or minimize soil erosion and transport due to ground-disturbing activities such as grading. Such measures may include, but would not be limited to, stabilized construction entrances, silt fences, temporary sediment traps and filtering devices and earth dikes. Once approved, these plans would be implemented during construction.

Water Quality

Implementation of erosion and sediment control practices, such as installation of silt fence, sediment trapping or filtering, and other BMPs, would help to avoid temporary impacts to water quality during construction. Stormwater management plans would be prepared and implemented onsite to address long-term stormwater runoff.

Vegetation

Protection measures and BMPs would be implemented to avoid impacts to park vegetation to the extent possible. Vegetation protection measures would be detailed in the design phase of the project and may include, but would not be limited to: evaluation of large trees (such as the large oak tree at the Dumbarton Street playground area on the Rose Park Trail segment) and development of a tree save plan by an arborist or licensed tree expert; installation of tree protection fencing, root pruning for trees whose critical root zones (CRZs) lie within the existing trail alignment or proposed construction area; and staging construction equipment to avoid damage to park vegetation. All revegetation would fulfill NPS functional and aesthetic requirements. Landscape plans would be developed in coordination with the NPS and DDOT's Urban Forestry Administration. Areas replanted following construction would be monitored to ensure successful establishment.

Wildlife

Best management practices would be utilized to minimize impacts to terrestrial and aquatic habitats. Detailed tree save plans would be developed and implemented during construction to protect surrounding trees that form forest habitat for park wildlife. Erosion and sediment control plans would also be prepared and implemented to avoid and minimize potential impacts to aquatic habitat within Rock Creek and Piney Branch that could be caused by soil erosion and sediment transport.

Historic Structures and Districts / Cultural Landscapes

All work proposed under Action Alternatives would be completed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* in order to avoid and/or minimize any adverse impacts to cultural resources. Efforts to minimize impacts to cultural resources through design include: trail improvements that would retain the curvilinear design of the trail; proposed trail connections that would be the minimum span needed to achieve the stated goals and laid directly on the existing topography; new trail connectors consistent in material and design features with the existing trails and that would not introduce new elements inconsistent with the park and parkway's other features; minimal new paving in areas of the trail that follow historic alignments; and spot improvements and trail widening that would avoid damage to, and loss of, existing vegetation.

Cultural Landscapes

Plans for construction staging of equipment and materials would be developed in order to least impact views within the cultural landscape. Landscape plans would be developed considering the cultural landscape, and in accordance with NPS policies. The NPS currently is developing a cultural landscape report for the historic trails in the park. This documentation and planning effort will be completed in the fall of 2012.

Archeology

Mitigation for impacts to archeological resources may include, but would not be limited to the following: conducting a Phase IB survey within areas of the LOD not previously surveyed, hand removal of vegetation to minimize impacts to identified archeological resources within the LOD, and retaining current trail widths within identified archeological resources. Testing areas would include, but would not be limited to, the location of the former headrace near Piney Branch. In locations where measures to avoid and minimize impacts to archeological resources cannot be instituted, mitigation through excavation within identified sites may be implemented. NPS, DDOT, and FHWA would continue to consult with the DC HPO throughout the project to avoid impacts to potential archeological resource areas.

Visitor Use and Experience

To notify trail users, park visitors, and motorized commuters of temporary closures or changes in traffic patterns, public notifications may include electronic notification and detour signage, postings to the Rock Creek Park website, and email and listserv notices for stakeholders and interested parties. Additionally, plans for construction equipment and materials staging areas would be developed to cause the least practicable disruption to park visitors.

Human Health and Safety

To minimize risk to public safety, short-term safety measures would be implemented in proposed construction areas throughout the Rock Creek Park multi-use trail. Signage would be utilized in order to warn pedestrians and bicyclists in zones that are under construction. Staging areas that house equipment and materials would be fenced off from the public. At road crossings, maintenance of traffic during construction stages would be conducted to provide safe conditions for trail users, drivers and workers. After construction, NPS would follow established maintenance practices such as removal of debris, and repairs to potholes and cracks to ensure trail safety for park visitors.

Park Operations and Management

No mitigations measures were identified for park operations and management.

Traffic and Transportation

Plans to maintain traffic during construction would be developed to minimize impacts to trail users and motorized commuters. Advance notifications of temporary closures or changes in traffic patterns would be implemented and may include electronic notification and detour signage, postings to the Rock Creek Park website, and email and listserv notices for stakeholders and interested parties. At some locations, such as the Beach Drive tunnel, work would be scheduled to avoid times of peak traffic volumes.

AGENCY CONSULTATION

As part of the planning process for the Rock Creek Park Multi-Use Trail Rehabilitation EA, DDOT, in conjunction with the NPS and FHWA, conducted agency coordination as detailed in ***Chapter 5*** of the EA. Coordination included project scoping, consultation with resource agencies in accordance with Section 7 of the Endangered Species Act of 1973, consultation with the DC Historic Preservation Office (DC HPO) in accordance with Section 106 of the NHPA, and coordination with the National Zoological Park (NZP).

In accordance with Section 7 of the Endangered Species Act, consultation letters were sent from DDOT to District of Columbia Department of Health (DDOH), the U.S. Fish and Wildlife Service (USFWS), and the NPS Center for Urban Ecology on December 14, 2010. In a letter dated April 20, 2011, the USFWS confirmed that there are no known federally listed species or habitat within the project limits, and Section 7 consultation with USFWS for the project was complete. No additional responses were received.

On February 27, 2009, scoping letters were sent to several local and federal agencies to solicit comments on the proposed project. The National Capitol Planning Commission (NCPC) responded via a letter dated March 23, 2009 and asked that they be identified as a cooperating federal agency for NEPA. NCPC asked that the EA analyze elements of the *Comprehensive Plan for the National Capital*, stormwater management, impacts to forest corridors and buffers, and historic resources and attributes. The Smithsonian Institute (SI) responded by an email dated March 18, 2009 and commented that the National Zoo Property and the Holt House are both in the NRHP. SI also provided concerns that they would like to be addressed in the EA including Historic Districts, transportation issues regarding road crossings, protection of Rock Creek Valley, and analysis of visual and aesthetic features. The District of Columbia Office of Planning (DC OP) provided comments by letter dated March 25, 2009 discussing policies of the District's Comprehensive Plan that promote multi-modal accessibility to District neighborhoods and key destinations. DC OP also asked that the EA assess the impacts of the proposed trail rehabilitation on the adjacent communities.

Scoping letters were sent again on January 24, 2011 to local and federal agencies to solicit comments and to invite recipients to an Agency Scoping Meeting. The Agency Scoping Meeting was held on February 15, 2011 at the Rock Creek Park Maintenance Yard Conference Room, 5000 Glover Road, Washington, DC 20015. The purpose of the meeting was to obtain agency and elected officials feedback on the proposed action and scope of the EA and to present the preliminary project alternatives. Agencies attending the meeting included DC Water, Commission of Fine Arts (CFA), NCPC, District Department of the Environment (DDOE), and a representative of District of Columbia Councilmember Muriel Bowser (Ward 4). The attendees were supportive of the project and provided recommendations to refine the preliminary alternative concepts including preliminary design and stormwater management concepts. The discussion also included suggestions for items to consider in the design phase of the project, such as materials selection and signage styles.

The project team met with National Zoo senior managers on June 1, 2011 to present the proposed action and alternatives, and discuss issues such as the Zoo gates to the north and south of the Beach Drive tunnel and the deteriorating timber retaining wall within the perimeter fence. The National Zoo staff explained that the outer perimeter fence and accompanying gates, as well as their timed closures, are required in order to maintain the National Zoo's accreditation by the American Zoological and Aquarium Association (AZA). After a presentation and discussion, the National Zoo senior management endorsed Rock Creek Park Multi-Use Trail Rehabilitation Project Alternative 3: Trail Resurfacing and Widening, including trail widening from eight feet to 10 feet on National Zoo property.

Section 106 consultation was originally initiated in 2009 for the previous EA effort. On March 19, 2009, DC HPO replied with a letter stating that the project would occur within or immediately adjacent to several sites listed on the NRHP or DC Inventory of Historic Sites, including Rock Creek Park, Greystone Enclave, Piney Branch Parkway, National Zoological Park, and the Rock Creek and Potomac Parkway. The DC HPO also stated that the project may result in direct or indirect effects on the following historic districts: Mount Pleasant, Woodley Park, Kalorama Triangle, Sheridan-Kalorama, Massachusetts Avenue, Oak Hill Cemetery, Montrose Park, and Georgetown. The DC HPO stated the EA should evaluate the potential for direct and indirect effects such as visual and audible impacts within these historic districts, as appropriate.

With the continuation of the EA process and in accordance with the regulations implementing Section 106 of the NHPA, letters initiating the process were resent to the DC HPO and the Advisory Council on Historic Preservation (ACHP) on December 14, 2010. No response was received from the ACHP and a response is not expected since it has been determined that the project would result in a Finding of No Adverse Effect. The DC HPO responded to the initiation letter on January 18, 2011 via a letter confirming that the project will occur within or adjacent to three historic districts listed in the NRHP; the Rock Creek Park, Rock Creek and Potomac Parkway, and the National Zoological Park Historic Districts. DDOT submitted a letter requesting concurrence on the APE on July 5, 2011 and DC HPO concurred with the APE on July 14, 2011. Since numerous archeology sites have been identified near the project area, the DC HPO recommended coordination with Dr. Ruth Trocolli and Dr. Stephen Potter (NPS Regional Archeologist) prior to ground disturbance. DDOT also coordinated archeological resource concerns with NPS and DC HPO as part of the archeological investigation, EA, and Section 106 processes. DDOT/FHWA then submitted an Assessment of Effect to the DC HPO on September 18, 2011 and received DC HPO concurrence on the Finding of No Adverse Effect on October 19, 2011.

PUBLIC INVOLVEMENT

Public scoping for the proposed action was originally initiated by NPS in 2006. A meeting was held on October 26, 2006 at Peirce Mill to give the public the opportunity to share ideas on the potential rehabilitation of the trail. Based on comments received during the 2006 scoping, a project to prepare an EA commenced in 2009. During this time, federal and local agencies, as well as community stakeholders, were invited to provide comments on the scope of the EA and the proposed action. Three letters were received from the public during the scoping period. A letter from Friends of Peirce Mill was received describing the restoration efforts underway at the Mill in 2009. The Friends of Rose Park commented on their preference to see the Rose Park Trail renovated in its current location and at its current width. The Beall Court Condominium Association also commented that the Rose Park Trail should not be widened. Prior to the release of the EA, the project was put on hold.

In November 2010, the Rock Creek Park Multi-Use Trail Rehabilitation Project was reinitiated. In addition to an agency scoping period, a public scoping period was opened from January 28, 2011 through February 28, 2011. During this time, the public was invited to provide comments on the proposed action and scope of the EA, and issues and concerns regarding natural, socioeconomic and cultural resources. Public notices were posted on the National Park Service's Planning, Environment, and Public Comment website (PEPC); the DDOT website and Facebook pages; and advertised in *The Washington Post* and *The Current* newspapers. The project team also sent email notices or posted to listservs of Advisory Neighborhood Commissions (ANC), community groups, and potential stakeholders, including individuals and groups who previously expressed an interest in the project.

A public scoping meeting was held on February 23, 2011, at the National Zoological Park Visitor Center Auditorium, 3001 Connecticut Avenue, NW, Washington, DC. The purpose of this meeting was to solicit public input on the purpose, need, and objectives of the project, major issues, and alternatives. A total of fifty-four (54) people signed in to the meeting. The meeting was held in an open-house format followed by an open microphone session in which attendees could sign up to speak at a microphone. The open microphone session was recorded by a court reporter. In addition, attendees were encouraged to comment in writing.

About six hundred (600) comments were received during the scoping period from January 28, 2011 through February 28, 2011. In general, the comments articulated support for the action alternatives. The vast majority of commenters favored Rock Creek Park Multi-Use Trail Alternative 3, Peirce Mill Trail Spur Option B, and Rose Park Trail Option C. Many commenters replied that the portion of the Rock Creek Trail on the National Zoo property should remain open 24 hours per day, or improvements should be made to the trail as it runs through the Beach Drive tunnel detour.

Commenters articulated concern over trail detours during construction and stated that detours should be well marked and easy to use. Many commenters expressed safety concerns due to trail deterioration, poor visibility, and road crossings. Some commenters asked that signage be added to the trail indicating trail connections and distances. Other concerns included trail maintenance, natural resource protection, and stormwater management. Comments were received from the Friends of Rose Park stating preference for the Rose Park trail to be resurfaced, but not moved or widened. Some commenters asked that speed control measures be used in Rose Park to slow bikers.

In addition to public scoping, the project team held a meeting with the Friends of Rose Park on April 13, 2011. At the meeting, Rose Park Trail options were presented and comments were received. Comments received from the Friends of Rose Park expressed concerns regarding widening of the trail, the proximity of the trail to children's play areas, and the preservation of an oak tree adjacent to the trail at the Dumbarton Street playground area.

Following the release of the EA, DDOT held a public hearing on December 14, 2011. The meeting provided the public with an opportunity to review the Rock Creek Park Multi-Use Trail Rehabilitation EA and Section 106 Evaluation and provide formal comments. The majority of hearing comments indicated Alternative 3 as the preferred alternative for the Rock Creek Trail. No comments were received in support of Alternative 2. For the Rose Park Trail, the majority of hearing comments were in favor of Option B, C, or either option. However, comments were received questioning the safety of Options B and C, and the protection of vegetation in Rose Park.

CONCLUSION

The FHWA has determined that the Preferred Alternative and options for the proposed Rock Creek Park Multi-Use Trail Rehabilitation Project will not have a significant impact on the natural, human or built environment as defined by CEQ. This Finding of No Significant Impact (FONSI) is based on the findings of the proposed project's Final EA and comments submitted during preparation of the EA. The Final EA has been evaluated by the FHWA, using CEQ regulations and FHWA guidelines, and has been determined to adequately discuss the need, environmental issues, and impacts of the proposed project and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an environmental impact statement is not required. The FHWA takes full responsibility for the accuracy, scope, and content of the attached Final EA.

Approved: Joseph C Lawson 6/11/2014

Joseph C. Lawson Date
Division Administrator
Federal Highway Administration
District of Columbia Division