		}
EXHIBIT	NO.	

28 9-12-06

City of Alexandria, Virginia

MEMORANDUM

DATE:

SEPTEMBER 6, 2006

TO:

THE HONORABLE MAYOR AND MEMBERS OF CITY COUNCIL

FROM:

JAMES K. HARTMANN, CITY MANAGER

8

SUBJECT:

CONSIDERATION OF STAFF REPORT ON THE NATIONAL PARK

SERVICE 2006 ENVIRONMENTAL ASSESSMENT OF JONES POINT PARK

ISSUE: Consideration of Staff Report on the National Park Service (NPS) 2006 Environmental Assessment of Jones Point Park.

RECOMMENDATION: That City Council:

- (1) Receive this report on the Jones Point Park 2006 Environmental Assessment;
- (2) Request the Mayor to attend the September 13 National Park Service Public Hearing on the Jones Point Park 2006 Environmental Assessment, and express the City's concerns about the location of the proposed parking, the community garden realignment, the loss of playing fields, and the use of the event lawn for organized sports. Staff recommends that the Mayor advise the NPS that City Council will be seeking further mitigation for the loss of fields, parking and open space and will submit its formal position on the plan before the October 18 deadline; and
- (3) Schedule the NPS Environmental Assessment for public hearing by Council at its Tuesday, September 26 legislative meeting and Council consideration at its Tuesday, October 10 legislative meeting.

BACKGROUND: Due to the terrorist attacks of September 11, 2001, a security and threat analysis was performed by the Transportation Safety Administration (TSA) on the Wilson Bridge. This analysis identified the public parking area planned underneath the bridge as a safety concern and recommended that all public parking be eliminated underneath the bridge and, that additional vehicle restrictions or setbacks of 80 ft. from either side of the bridge, be implemented to increase the security of the bridge. The Federal and State Agencies responsible for the construction and maintenance of the bridge the Federal Highway Administration (FHWA), Virginia Department of Transportation (VDOT) and Maryland State Highway Administration (MSHA), agreed to the recommended changes which resulted in required changes being made to the design of the 65% Jones Point Park Concept Plan. This plan was approved by City Council in 2000 and was

included within the National Park Service Jones Point Park 2001 Environmental Assessment document.

On February 22, 2005, in order for the City to develop a recommended plan for submission to the National Park Service for a new Jones Point Park Environmental Assessment, City Council asked that staff form a Work Group to review issues, security measures and how they would impact the provisions of the approved 65% Jones Point Park Concept Plan (2000). These discussions included the location, size and number of planned athletic fields, consideration of wetland areas and flooding, the location and amount of parking needed within the park and the use of green infrastructure and environmentally and neighborhood friendly design for the park.

In June 2005, after months of deliberation that included work sessions and public hearings, City Council approved a recommendation to send forward to the National Park Service for inclusion in the new Jones Point Park Environmental Assessment. As a result, the City's recommendation, "Alternative 1- Alexandria City Council Recommendation Scheme A", was included in the 2006 National Park Service Jones Point Park Environmental Assessment document (Attachment).

<u>DISCUSSION</u>: On August 18, 2006, the National Park Service released the Jones Point Park 2006 Environmental Assessment. The National Park Service's preferred alternative (Alternative 4) is significantly different from the City recommendation (Alternative 1) in a number of areas.

- 1. The NPS Plan reduces the number of athletic fields from two full size fields (60yd. X 110yd. as shown in the City Plan) north of the Wilson bridge to one small athletic field (40yd x 80yd) south of the bridge. The reduction to one field will reduce the number of youth teams that can be provided athletic field space. The City plan provided for continued growth and capacity for the future with the inclusion of two full sized fields in the park design.
 - With this reduction in fields, staff recommends that the City seek mitigation from the NPS so that field space elsewhere in the City can be explored.
- 2. The event lawn area continues to be used for organized sport leagues in the NPS Preferred Alternative. In the City plan the area is used to create a pastoral, historical, cultural and archeologically significant area that has scheduled programs or events.
- 3. Parking is reduced in the NPS plan to 81 daily spaces and an access road is created that intrudes into the park to the river front. While the City plan does provide for more parking spaces (It has 110 spaces.), the parking remains west of Lee Street and the City plan keeps significant green vegetative open space near the river front area.
- 4. The NPS preferred alternative provides for 159 spaces of event parking underneath the Wilson Bridge, but does not identify the specific security

requirements or costs related to the parking. The City continues to contend that due to the security threat assessment performed by TSA and the subsequent recommendation that was accepted by the Federal and State agencies responsible for the Bridge (the same recommendation that mandated the changes to the 65% Jones Point Park Plan). The City also has lost the ability to provide parking to the public under the bridge and as such, parking underneath the bridge is not shown in the City plan. In addition, while all plans show the mandated 80 ft. set back area of the bridge, the City contends that this security area is "lost to use" and mitigation for the loss should be provided to the City.

5. The community gardens are shown to be re-aligned in the NPS preferred alternative. The gardens' location would be shifted to the north and reduced by 1100 square feet. The City plan showed no change in the location of the Community Gardens area.

Given the differences noted between the National Park Service Preferred Alternative 4 and the City's recommended plan (Alternative 1 in the NPS Environmental Assessment), staff recommends that Council request the Mayor to attend the September 13 NPS public hearing, express our concerns and note the City's intent to seek further mitigation for its loss of playing fields, open space and parking.

I recommend that City Council schedule a public hearing at Council's Tuesday, September 26 legislative meeting and schedule consideration of the City's final position on the NPS Environmental Assessment at Council's October 10 legislative meeting. The City's formal position on the plan would be submitted before the October 18 NPS deadline. This schedule gives the public the opportunity to provide its comments to the City on the plan, prior to Council adopting a formal position on the Environmental Assessment.

ATTACHMENTS:

Attachment 1. Table S-1, National Park Service Summary of Impacts by Alternative Attachment 2. Drawings of NPS Jones Point Park Alternatives 1-4

STAFF:

Kirk Kincannon, Director, Recreation, Parks and Cultural Activities
Rich Baier, Director, Transportation and Environmental Services
Jim Mackay, Director, Office of Historic Alexandria
Aimee Vosper, Supervisory Landscape Architect, Recreation, Parks and Cultural Activities

FROM NATIONAL PARK SERVICE ENVIRONMENTAL ASSESSMENT

TABLE S-1 SUMMARY OF IMPACTS BY ALTERNATIVE

•	Торіс	Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)	Alternative 2 (VDOT "Access Option 5" dated 9/28/04)	Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)	Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)	No-Action Alternative
//	Does the Project Accomplish Purpose/ Fulfill Need	Fulfills the Purpose and Need for the proj for JPP (refer to Chapter 2.0 of this docur WWB Replacement Project (refer to the	nent), conditions relevant to JPP as stated	in the MOA and the ROD for the		
	Neighborhoods, Community Facilities, and Services	No impact on Royal St. or Lee St. community gardens. The Yates Garden neighborhood is approx. 100 feet from proposed access road and approx. 90 feet from closest parking area (forested buffer will remain). Impacts would be adverse, site-specific, long-term and minor	Affects approx. 170 s.f. (0.0039 acre) of Royal St. community garden. Affects approx. 11,875 s.f. (0.27 acre) of Lee St. garden (but reconfigured to mitigate impact). The Yates Garden neighborhood is approx. 60 feet from proposed access road and approx. 260 feet from westernmost parking area (forested buffer will remain). Impacts would be adverse, site-specific, long-term and minor.	Affects same amount of Royal Street community garden as Alternative 2. Affects approx. 2,280 s.f. (0.05 acre) less of Lee St. garden than Alternative 2. The Yates Garden neighborhood is same distance from proposed access road as Alternative 2 and approx. 100 feet from westernmost parking area (forested buffer will remain). Impacts would be adverse, site-specific, long-term and minor.	Affects same amount of Royal Street community garden as Alternative 2. Affects approx. 1,100 s.f. (0.03 acre) less of Lee St. garden than Alternative 2. The Yates Garden neighborhood is same distance from proposed access road as Alternative 2 and approx. 770 feet from westernmost parking area (forested buffer will remain). Impacts would be adverse, site-specific, long-term and minor.	No impact to community gardens. The Yates Garden neighborhood was approx. 300 feet from Jones Point Park Drive (prior to WWB construction activities). However, the vehicle access road would have to be modified since it is within the 80-foot distance surrounding the WWB. Neighborhood distance is approx. 770 feet from the existing parking area (same as Alternative 4).

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	Торіс	Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)	Alternative 2 (VDOT "Access Option 5" dated 9/28/04)	Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)	Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)	No-Action Alternative	
	Visual and Aesthetics	The addition of the access road, parking ar conditions under Alternatives 1, 2, and 3. the general vicinity of the existing soccer is	No impact				
		Perimeter barriers prevent vehicles from entering within an 80-foot distance surrounding the WWB and incorporate the natural landscape, to the greatest extent possible. The perimeter barriers would have a beneficial, site-specific, long-term visual effect. The intensity of visual effects from the perimeter barriers would range from minor to moderate as bollards would have a less natural appearance in the park than would landscape plantings.					
9	Visitor Use/Experience	Adding recreational facilities and enhancing active uses would have a beneficial, local, long-term, major effect. However, decreasing amount of forested area for passive recreation north of WWB and increasing the access distance by approx. 1,400 feet (between easternmost parking area and new fishing/canoe/kayak area) results in adverse, local, long-term, moderate impacts.	Adding recreational facilities and enhancing active uses would have similar effects as Alternative 1. Decreasing amount of forested area for passive recreation north of WWB and increasing the access distance by approx. 220 feet (between easternmost parking area and new fishing/canoe/kayak area) results in similar effects as Alternative 1.	Adding recreational facilities and enhancing active uses would have similar effects as Alternative 1. Decreasing amount of forested area for passive recreation north of WWB and increasing the access distance by approx. 650 feet (between easternmost parking area and new fishing/canoe/kayak area) results in similar effects as Alternative 1.	Adding recreational facilities and enhancing active uses would have similar effects as Alternative 1. Compared to other alternatives, Alternative 4 has less effect on forested areas and increases access distance by approx. 600 feet (between proposed parking area and new fishing/canoe/kayak area) resulting in an adverse, local, long-term, minor effect.	Distance between existing parking area and access to shoreline is approx. 340 feet.	
	Environmental Justice	There would be no disproportionately high populations. Changing the finishing pier to southeastern edge of the park, within 200 park users, including the minority fishing	No Impact				
	Soils	Generally, little effect on soils as grading a soils intact. Most existing soil is fill mater expected to be adverse, site-specific, short	No Impact				

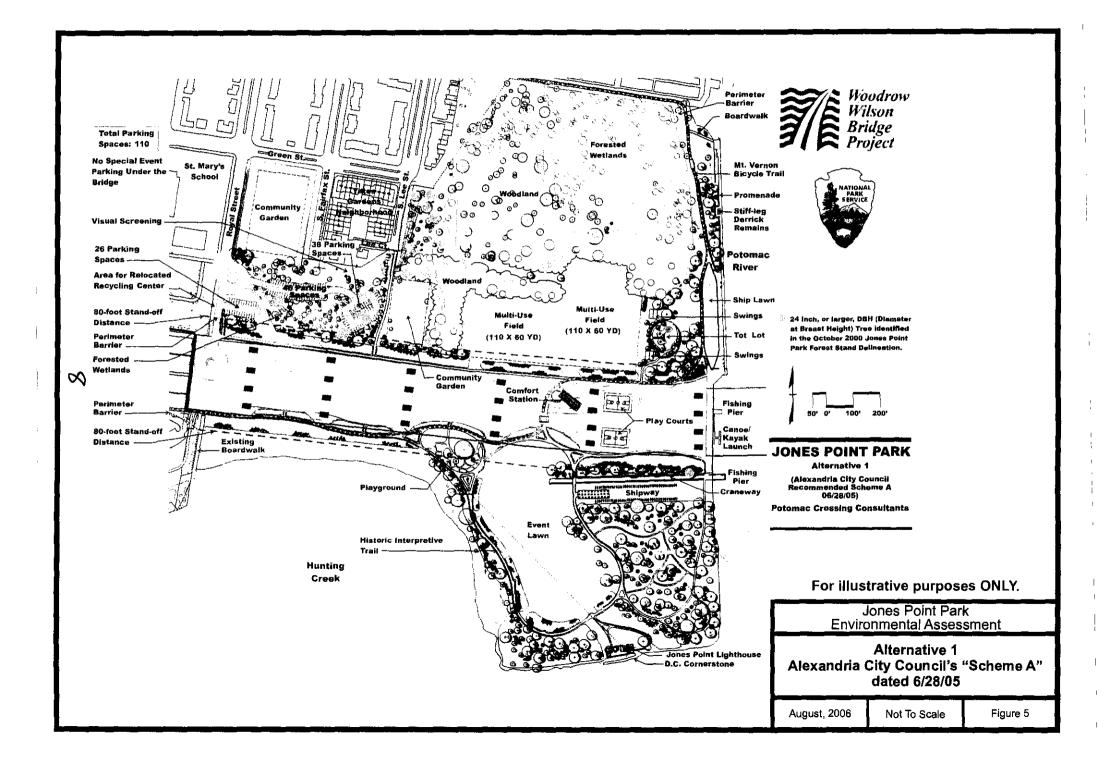
August 2006

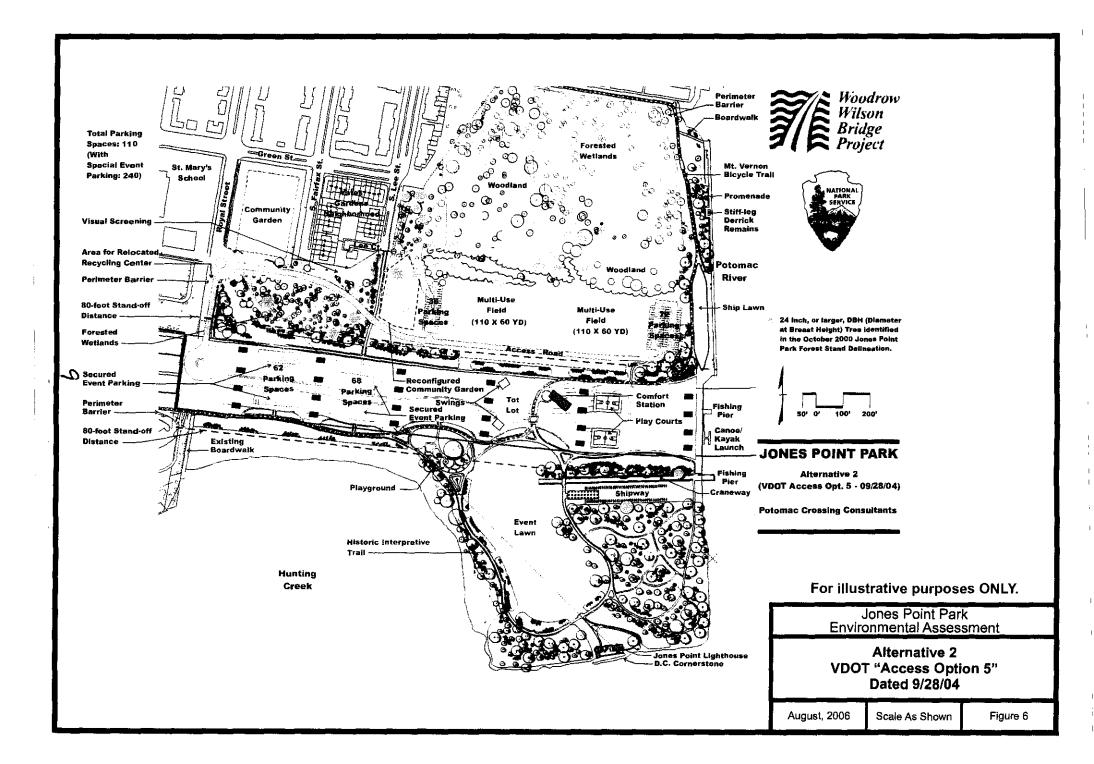
Topic	Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)	Alternative 2 (VDOT "Access Option 5" dated 9/28/04)	Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)	Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)	No-Action Alternative	
Wetlands and Waters of the U.S.	Affects approx. 14,810 s.f. (0.3 acre) Effects would be adverse, site-specific, short-term, and minor.	Affects approx. 20,900 s.f. (0.5 acre) Effects would be adverse, site- specific, short-term, and minor.	Affects approx. 15,923 s.f. (0.4 acre) Effects would be adverse, site- specific, short-term, and minor.	Affects approx. 15,680 s.f. (0.4 acre) Effects would be adverse, site- specific, short-term, and minor.	No Impact	
Vegetation	removal of 1 tree > 24 inch dbh and trimi	ming or removal of 13 trees < 24 inch dbl		ain critical lift points along Jones Point Pa ween Royal Street and Lee Street, where p llows:		
	Common among all action alternatives:	1.0 acre of forest impact and 2 trees > 24	inch dbh to expose the historic shipway fo	or interpretation purposes.	Spread of the invasive	
	Removes approx. 4.1 acres of forest including up to 3 trees >24 inch dbh. Removes invasive porcelain berry vine. Effects would be adverse, site-specific, long-term, and moderate.	Removes approx. 4.6 acres of forest including up to 1 tree >24 inch dbh. Removes invasive porcelain berry vine. Effects would be adverse, site-specific, long-term, and moderate.	Removes approx. 3.5 acres of forest including up to 1 tree >24 inch dbh. Removes invasive porcelain berry vine. Effects would be adverse, site-specific, long-term, and moderate.	Removes approx. 1.7 acres of forest including up to 1 tree >24 inch dbh. Removes invasive porcelain berry vine. Effects would be adverse, site-specific, long-term, and minor.	porcelain berry vine would result in continued loss of forest habitat.	
Terrestrial Habitats and Wildlife	Clearing of trees and understory vegetati anticipated to be minimal and are not exp		r forest and forest edge birds and other wi e park. Effects are expected to be adverse		No Impact	
Noise	have not been completed, experience sho	ws that recreational noise is not anticipat action alternatives are expected to have a	P and exceed noise generated by recreations of the increase over current ambient measure adverse, site-specific, long-term, minor levels in the vicinity of the work areas.	rements and would not lead to increases	Noise levels expected to be less than one decibel different than the action alternatives	
Historic/Archeological Resources	The action alternatives would rehabilitate and preserve the Jones Point Lighthouse and D.C. South Cornerstone, including rebuilding the retaining wall and the vault that protects the cornerstone. Therefore, the action alternatives would have a beneficial, local, long-term, major effect on cultural resources. However, an adverse, site-specific, short-term, minor impact on cultural resources would occur during the construction phase of the project (due to the need to make minor changes to the land surface that would close the site to public access during construction activities). The action alternatives would have negligible impact on the Alexandria National Historic Landmark Historic District and the Alexandria National Register Historic District. For purposes of Section 106, the determination of effect would be No Adverse Effect on either district.					
Utilities	The action alternatives would have an adpark improvements. The addition of new office/comfort station.	No Impact				

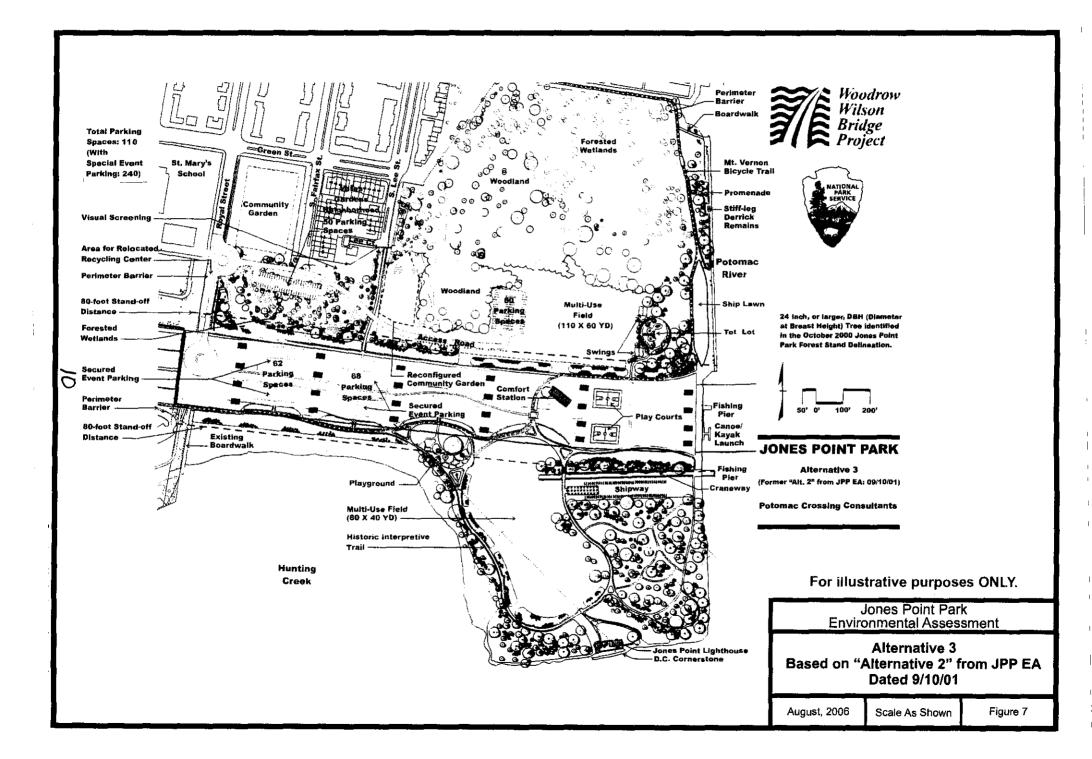
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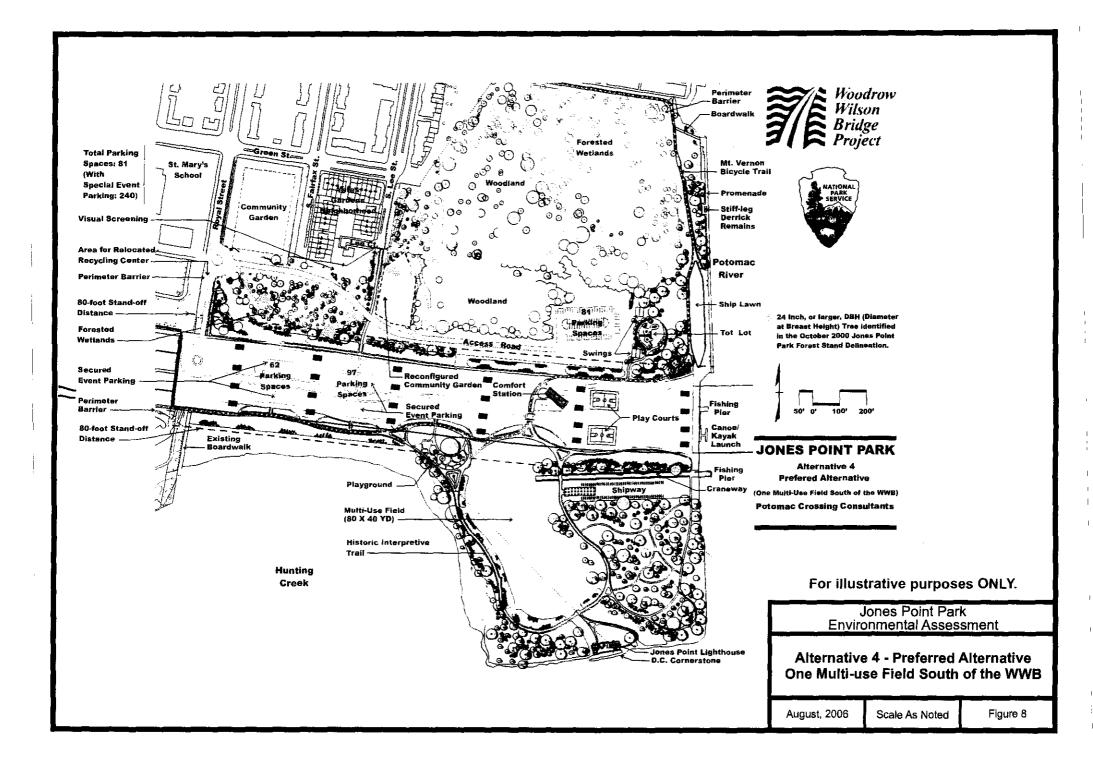
Topic	Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)	Alternative 2 (VDOT "Access Option 5" dated 9/28/04)	Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)	Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)	No-Action Alternative	
Safety and Security	Perimeter barriers prevent vehicles from entering within an 80-foot distance surrounding the WWB and increase public safety and security. The action alternatives are expected to have a beneficial, site-specific, long-term, moderate impact on safety and security.					
Indirect and Cumulative Effects	existing drainage problem (flooding of flooding from the Potomac River. Th	roads due to inadequate pipe sizes) with e proposed improvements would not inc ct on stormwater flow in JPP by expand	ge culverts would be replaced and one no in the park. JPP would continue to floo crease flooding from the Potomac River, ling the capacity of the storm drainage s	d above the 10-year storm event due to The action alternatives would have a	Existing drainage patterns would remain the same, and the roads would flood at less than the 10-year storm event due to inadequate culvert sizes to handle the site runoff.	

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City of Alexandria's NPS JPP EA 2006 ACTION ALTERNATIVE COMPARISON 9/12/06

MAJOR EVENTS	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
	City of Alexandria's Scheme A	VDOT "Access Option 5"	Based on "Alternative 2" from	NPS Preferred Alternative –
	dated 6/28/05 Recommendation to NPS		JPP EA dated 9/10/01	One Multi-use Field South of the WWB
Fields	Two 110x60 fields north of	Two 110x60 fields north of	One 110x60 field north	One 80x40 field south of
	the bridge.	the bridge-	of the bridge and one	the bridge.
		Fields are end to end.	80x40 field south of the	
			bridge.	
Parking	110 spaces west of Lee	110 spaces – 72 near the	110 spaces -60 between	81 spaces near the water
	Street.	water's edge and 38 spaces	the wooded area and the	located within the
	No special event parking	between the reconfigured	multi-use field north of	existing gravel parking
	under the bridge due to	community gardens and the	the bridge and 50 spaces	lot, north of the bridge.
	security concerns.	western most multi-use	west of Lee Street.	159 special event parking
		field.	130 special event parking	under the bridge.
		130 special event parking	spaces under the bridge.	
		spaces under the bridge.		
Lee Street Community	Untouched.	Reconfigured, shifted to	Reconfigured, shifted to	Reconfigured, shifted to
Gardens		the north	the north and 2,280 sf	the north, and 1,100 sf
			less in size	less in size
Recycling Center	Including-unchanged	Included-unchanged	Included-unchanged	Included-unchanged
Comfort Station/Office	Including-unchanged	Included-unchanged	Included-unchanged	Included-unchanged
playgrounds, etc.				
·	Untouched - specific to	Untouched – specific to	Multi-use field located	Multi-use field located
Event Lawn	only events/and passive	only events/and passive	within event lawn	within event lawn
	lawn area	lawn area		

Historic/Archeology Interpretive trail and areas	Untouched	Untouched	With field located near hist/arch elements, interpretive areas become less passive. Potential impact to DC Cornerstone interpretive line.	With field located near hist/arch elements, interpretive areas become less passive. Potential impact to DC Cornerstone interpretive line.
Stormwater/Flooding	Improvements to park improve SW issues	Improvements to park improve SW issues	Improvements to park improve SW issues	Improvements to park improve SW issues
Wetlands	Areas impacted: Approx. 14,810 sf	Areas impacted: Approx. 20,900 sf	Areas impacted: Approx. 15, 953 sf	Areas impacted: Approx. 15,680 sf
Trees	Removes forested area, much of which is overrun with invasive species. Loss of approx. 3 trees >24"	Removes forested area, much of which is overrun with invasive species. Loss of approx. 1 tree >24"	Removes forested area, much of which is overrun with invasive species. Loss of approx. 1 tree >24"	Removes forested area, much of which is overrun with invasive species. Loss of approx. 1 tree >24"
Soils	Clean fill to be added to address any soils issues	Clean fill to be added to address any soils issues	Clean fill to be added to address any soils issues	Clean fill to be added to address any soils issues
Opportunities under the bridge	Room for recreational opportunities under the bridge	Event parking takes up available room under bridge	Event parking takes up available room under bridge	Event parking takes up available room under bridge

Jones Point Park

Review of

National Park Service JPP EA 2006

September 12, 2006

Background

- Original Concept plan included in NPS JPP EA 2001.
- NPS JPP EA circulated for public comment.
- Consideration of the JPP EA 2001 alternatives halted by the Federal Government.
- City considered revised options for the park.
- June 2005 City approved and recommended to NPS- Scheme A.

Current

- August 18, 2006 National Park Service released Jones Point Park 2006 Environmental Assessment (EA)
 - Included four action alternatives and one no-build option.
 - City reviewing EA.
 - NPS Public Hearing September 13, 2006.
 - City Council Public Hearing September 26, 2006.

Matrix of Action Alternatives

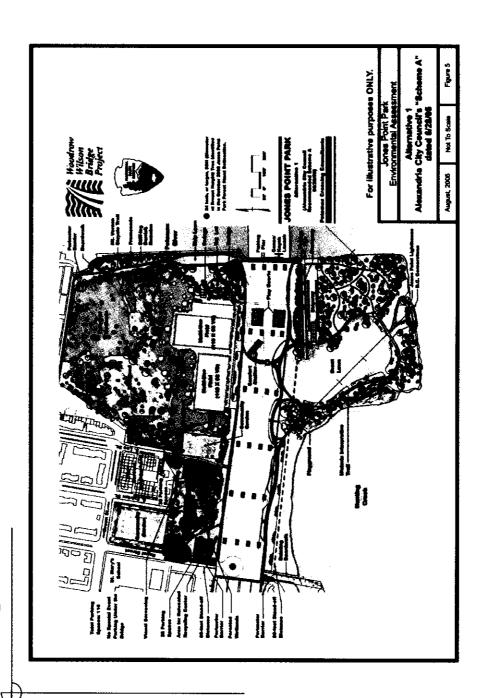
MAJOR ELEMENTS	ALTERNATIVE 1 City of Alexandria's Scheme A dated 6/28/05 Recommendation to NPS	ALTERNATIVE 2 VDOT " <i>Access Option 5"</i>	ALTERNATIVE 3 Based on "Alternative 2" from JPP EA dated 9/10/01	ALTERNATIVE 4 NPS Preferred Alternative One Multi-use Field South of the WWB
Fields	Two 110x60 fields north of the bridge.	Two 110x60 fields north of the bridge-Fields are end to end.	One 110x60 field north of the bridge and one 80x40 field south of the bridge.	One 80x40 field south of the bridge
Parking	110 spaces west of Lee Street. No special event parking under the bridge due to security concerns	110 spaces – 72 near the water's edge and 38 spaces between the reconfigured community gardens and the western most multi-use field. 130 special event parking spaces under the bridge	110 spaces –60 between the wooded area and the multi-use field north of the bridge and 50 spaces west of Lee Street. 130 special event parking spaces under the bridge.	81 spaces near the water located within the existing gravel parking lot, north of the bridge. 159 special event parking under the bridge.
Lee Street Community Gardens	Untouched.	Reconfigured, shifted to the north	Reconfigured, shifted to the north and 2,280 sf less in size	Reconfigured, shifted to the north, and 1,100 sf less in size
Recycling Center	Included-unchanged	Included-unchanged	Included-unchanged	Included-unchanged
Comfort Station/Office playgrounds, etc.	Included-unchanged	Included-unchanged	Included-unchanged	Included-unchanged

1					
1	MAJOR ELEMENTS	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3	ALTERNATIVE 4
	Event Lawn	Untouched - specific to only events/and passive lawn area	Untouched – specific to only events/and passive lawn area	Multi-use field located within event lawn	Multi-use field located within event lawn
	Historic/Archeology Interpretive trail and areas	Untouched	Untouched	With field located near hist/arch elements, interpretive areas become less passive. Potential impact to DC Cornerstone interpretive line.	With field located near hist/arch elements, interpretive areas become less passive. Potential impact to DC Cornerstone interpretive line.
	Stormwater/Flooding Improvements to park improve SW issues		Improvements to park improve SW issues	Improvements to park improve SW issues	Improvements to park improve SW issues
	Wetlands	Per EA Areas impacted: Approx. 14,810 sf	Per EA Areas impacted: Approx. 20,900 sf	Per EA Areas impacted: Approx. 15, 953 sf	Per EA Areas impacted: Approx. 15,680 sf
	Trees	Removes forested area, much of which is overrun with invasive species. Loss of approx. 3 trees > 24"	Removes forested area, much of which is overrun with invasive species. Loss of approx. 1 tree >24"	Removes forested area, much of which is overrun with invasive species. Loss of approx. 1 tree >24"	Removes forested area, much of which is overrun with invasive species. Loss of approx. 1 tree >24"
	Soils	Clean fill to be added to address any soils issues	Clean fill to be added to address any soils issues	Clean fill to be added to address any soils issues	Clean fill to be added to address any soils issues
	Opportunities under the bridge Room for recreational opportunities under the bridge		Event parking takes up available room under bridge	Event parking takes up available room under bridge	Event parking takes up available room under bridge

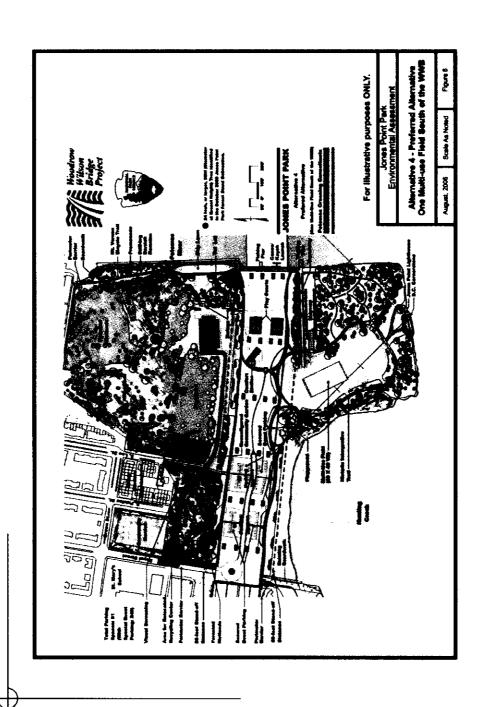
City Review of Two Options

- Alternative 1- Alexandria City Council's "Scheme A" dated 06/28/05
- Alternative 4 NPS Preferred Alternative- "One Multi-Use Field South of the WWB"

City's Alternative 1



NPS's Alternative 4



Main Differences Alternative 1

Two Large Fields north of the bridge

110 Parking Spaces w/in the park & west of Lee St.

No parking under the bridge

Event Lawn passive use

Community Gardens intact

Impact 14,810 sf Wetlands

Alternative 4

One Small Field south of the bridge

81 Parking Spaces w/in current gravel lot

159 Special Event Parking **Spaces**

Event Lawn Athletic Field

Lee St. Community Garden loss of 1,100 sf/shifted north

Impact of 15,953 sf Wetlands

Commonalities

- a comfort station
- play courts
- playgrounds
- community gardens
- fishing pier
- canoe/kayak launch
- recycling center
- promenade
- bicycle trail
- boardwalk
- historic interpretive elements
- same impact to the runoff and storm water issues: "a beneficial, local, long-term, major effect"
- expanded capacity of the storm drainage system

Issues/Concerns

Location of proposed Parking, Community Garden realignment, loss of Playing Fields, use of Event Lawn for organized sports.

- The NPS plan reduces the number of athletic fields from two full size fields to one small field.
- ◆ The Event Lawn is used for organized sport leagues in the NPS plan.
- ◆ The NPS plan reduces parking to 81 spaces, access road intrudes into the park to the river front.

Issues and Concerns

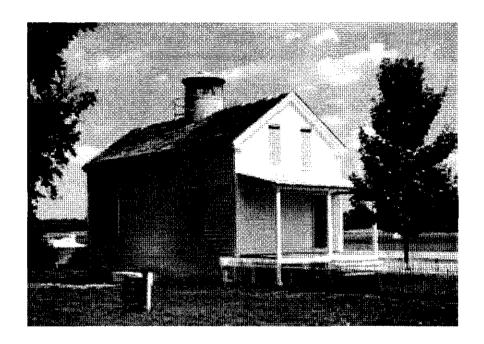
- ◆ NPS plan impacts more wetland area than the City's plan (15,953 sf. vs. 14,810 sf.)
- NPS plan shows Special Event parking spaces under the bridge, but TSA said No.
- ♦ NPS plan realigns the Lee Street Community Gardens and reduces the gardens by 1,100 sf.
- In all plans, parkland open space is impacted by the 80 ft. vehicle setback area on each side of the WWB.

Conclusion

- City Council adopted (2005) Alternative 1
 - Fulfills need for large multi-use fields.
 - Fulfills the NPS requirements of expanding and improving the quality of recreational opportunities within the park.
- Next Steps
 - NPS Public Hearing September 13, 2006
 - City Council Public Hearing September 26, 2006
 - Final Public Comments due to NPS October 18, 2006

JONES POINT PARK ENVIRONMENTAL ASSESSMENT

Woodrow Wilson Bridge Replacement Project
August 2006

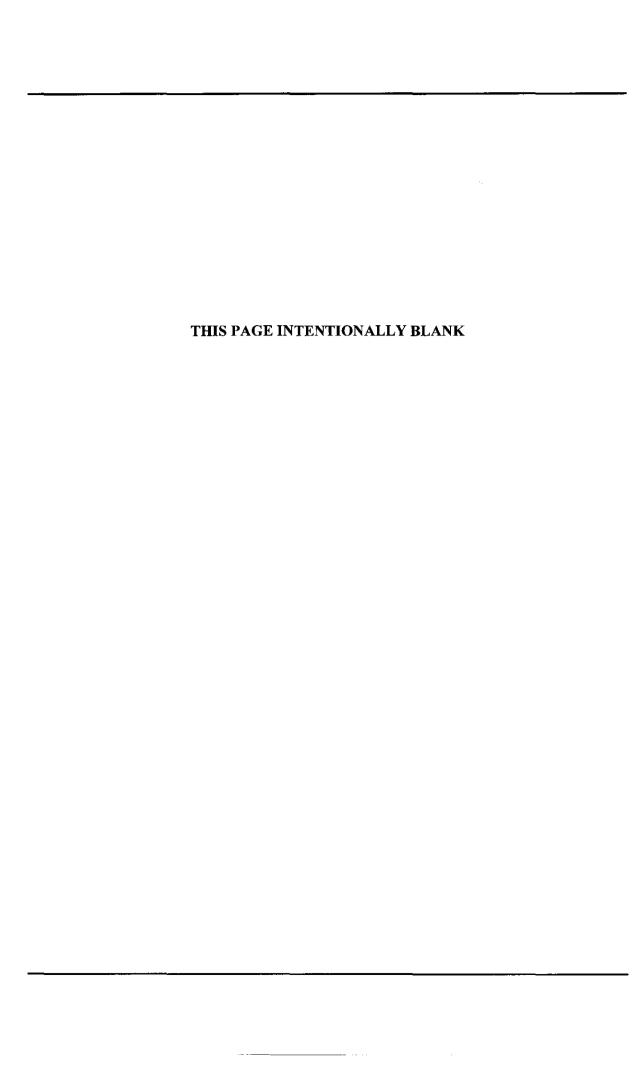


Prepared For The

National Park Service George Washington Memorial Parkway

By The

U.S. Department of Transportation Federal Highway Administration



SUMMARY

The National Park Service (NPS) proposes to improve and enhance Jones Point Park (JPP) located in the southeastern corner of the City of Alexandria, Virginia. The project includes recreational features, an interpretive plan related to cultural resources, and proposed modifications to parking and access within the park. The elevated Woodrow Wilson Bridge (WWB) traverses JPP. The Federal Highway Administration (FHWA) has approved improvements to the WWB and affected interchanges within a 7½-mile portion of I-95/I-495 (Capital Beltway). The proposed improvements to JPP are mitigation commitments to the NPS from FHWA for impacts to the park from the WWB Replacement Project.

The NPS signed the initial JPP Environmental Assessment (EA) on September 10, 2001. Terrorists attacked on September 11, 2001 crashing commercial airplanes into the World Trade Center in New York City, the Pentagon in Washington, D.C., and a field in Pennsylvania. The initial EA, which evaluated three alternatives, Alternatives 1, 2, and 3, was circulated for public comment between January 11, 2002 and February 11, 2002. In August 2003, the federal Transportation Security Administration (TSA) performed a vulnerability assessment and recommended the removal of all parking from beneath the new WWB. After careful evaluation of the risks of parking in JPP, a recommendation was set forth to eliminate all public parking and vehicular access within 80 feet of the north and south parapet driplines of the new WWB. There could be an exception for "special event parking" beneath the bridge if additional security measures are instituted.

TSA's recommendation, endorsed by the FHWA and accepted by the Maryland State Highway Administration (MSHA), the Virginia Department of Transportation (VDOT), the City of Alexandria, and the NPS (owner of JPP) has resulted in the need to reassess the parking, access, and security components of the park design. This EA evaluates a No-Action Alternative and four new action alternatives, Alternatives 1, 2, 3, and 4 that address parking, access, and security issues in JPP.

The No-Action Alternative maintains the two existing soccer fields located south of the WWB; therefore, no additional environmental, social, or construction impacts are expected due to new park improvements. However, the No-Action Alternative would not comply with the *Jones Point Park Environmental Assessment* (NPS, 2001) that outlined specific park improvements for expanded use and enjoyment of the park. The No-Action Alternative would not address TSA's security recommendation to remove all parking from beneath the new WWB. Finally, the No-Action Alternative would not implement those measures to enhance and minimize harm to recreational, natural, and cultural resources from the WWB Replacement Project that were identified and agreed to by the FHWA, NPS, VDOT, and local governments in the 1997 MOA, and the 1997 and 2000 ROD (refer to the Appendix).

Table S-1 summarizes the impacts for each alternative. All of the action alternatives contain similar construction impacts associated with the following proposed improvements to JPP: a park manager's office/comfort station, a tot lot, promenade/boardwalk, access to the Mt. Vernon Trail, shoreline stabilization, proposed bulkhead, canoe/kayak launch, a fishing pier, the rehabilitation and preservation of the D.C. South Cornerstone and the Jones Point Lighthouse,

and drainage improvements along the new access road. The differences between the action alternatives focus on potential impacts to wetlands, forests and vegetation, community gardens, and visitor use/experience.

This EA addresses the following issues that were identified from previous park planning efforts, input from various interested public groups and individuals, and input from local, state, and federal agencies:

- Natural Resources: Effects on wetlands, vegetation, wildlife, and soils.
- Cultural Resources: Effects on historic properties and archeological resources including the Jones Point Lighthouse and the D.C. South Cornerstone, and the Alexandria National Historic Landmark Historic District, and the Alexandria National Register Historic District.
- Surface Hydrology: Drainage patterns and the effect on adjacent residences.
- Visual and Noise Conditions: Effects from the removal of existing vegetation.
- Visitor Use and Experience: Active versus passive recreational opportunities in JPP. Preservation of natural areas. "Impairment" of park resources under the NPS Organic Act of 1916. Effects on visitor use such as recreational fields, circulation of pedestrians, vehicles and bicycles, and parking.
- Environmental Justice: Effects on minority populations that fish on the finishing pier (location of the proposed promenade/boardwalk).
- Safety and Security: Effects on park access and security with regard to the federal TSA's recommendations contained in the *Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project* (June 2002).
- Utilities: Effects on existing infrastructure including water and sanitary sewer lines, electrical power, and communication facilities.
- Other Projects: Relationship between the JPP improvements and the WWB Replacement Project.
- **Public Involvement**: The role of public involvement in park planning activities, including the EA.
- **Document Availability**: Accessibility of an electronic version of the EA during the public comment period.

TABLE S-1 SUMMARY OF IMPACTS BY ALTERNATIVE

Торіс	Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)	Alternative 2 (VDOT "Access Option 5" dated 9/28/04)	Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)	Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)	No-Action Alternative
Does the Project Accomplish Purpose/ Fulfill Need	Fulfills the Purpose and Need for the proj for JPP (refer to Chapter 2.0 of this docur WWB Replacement Project (refer to the	nent), conditions relevant to JPP as stated	in the MOA and the ROD for the	Fulfills the project's Purpose and Need, NPS resource management goals, MOA, ROD, and TSA security recommendations. Does not address the recommendations of the JPP Development Group, comprised of the NPS, City of Alexandria, and other stakeholders to provide two fields north of WWB.	Does not fulfill the project's Purpose and Need, NPS resource management goals, MOA, ROD, or TSA security recommendations. Does not address the Resolution adopted by the Alexandria City Council or the recommendations of the JPP Development Group comprised of the NPS, City of Alexandria, and other stakeholders.
Neighborhoods, Community Facilities, and Services	No impact on Royal St. or Lee St. community gardens. The Yates Garden neighborhood is approx. 100 feet from proposed access road and approx. 90 feet from closest parking area (forested buffer will remain). Impacts would be adverse, site-specific, long-term and minor.	Affects approx. 170 s.f. (0.0039 acre) of Royal St. community garden. Affects approx. 11,875 s.f. (0.27 acre) of Lee St. garden (but reconfigured to mitigate impact). The Yates Garden neighborhood is approx. 60 feet from proposed access road and approx. 260 feet from westernmost parking area (forested buffer will remain). Impacts would be adverse, site-specific, long-term and minor.	Affects same amount of Royal Street community garden as Alternative 2. Affects approx. 2,280 s.f. (0.05 acre) less of Lee St. garden than Alternative 2. The Yates Garden neighborhood is same distance from proposed access road as Alternative 2 and approx. 100 feet from westernmost parking area (forested buffer will remain). Impacts would be adverse, site-specific, long-term and minor.	Affects same amount of Royal Street community garden as Alternative 2. Affects approx. 1,100 s.f. (0.03 acre) less of Lee St. garden than Alternative 2. The Yates Garden neighborhood is same distance from proposed access road as Alternative 2 and approx. 770 feet from westernmost parking area (forested buffer will remain). Impacts would be adverse, site-specific, long-term and minor.	No impact to community gardens. The Yates Garden neighborhood was approx. 300 feet from Jones Point Park Drive (prior to WWB construction activities). However, the vehicle access road would have to be modified since it is within the 80-foot distance surrounding the WWB. Neighborhood distance is approx. 770 feet from the existing parking area (same as Alternative 4).

Topic	Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)	Alternative 2 (VDOT "Access Option 5" dated 9/28/04)	Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)	Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)	No-Action Alternative		
Visual and Aesthetics	conditions under Alternatives 1, 2, and 3.	The addition of the access road, parking areas, and multi-use fields would have an adverse, site-specific, long-term, moderate effect on visual and aesthetic conditions under Alternatives 1, 2, and 3. Under Alternative 4, these facilities would have a minor visual effect (the proposed multi-use field would be located in the general vicinity of the existing soccer fields, south of the WWB, which lessens its visual impact).					
	possible. The perimeter barriers would ha	Perimeter barriers prevent vehicles from entering within an 80-foot distance surrounding the WWB and incorporate the natural landscape, to the greatest extent possible. The perimeter barriers would have a beneficial, site-specific, long-term visual effect. The intensity of visual effects from the perimeter barriers would range from minor to moderate as bollards would have a less natural appearance in the park than would landscape plantings.					
Visitor Use/Experience	Adding recreational facilities and enhancing active uses would have a beneficial, local, long-term, major effect. However, decreasing amount of forested area for passive recreation north of WWB and increasing the access distance by approx. 1,400 feet (between easternmost parking area and new fishing/canoe/kayak area) results in adverse, local, long-term, moderate impacts.	Adding recreational facilities and enhancing active uses would have similar effects as Alternative 1. Decreasing amount of forested area for passive recreation north of WWB and increasing the access distance by approx. 220 feet (between easternmost parking area and new fishing/canoe/kayak area) results in similar effects as Alternative 1.	Adding recreational facilities and enhancing active uses would have similar effects as Alternative 1. Decreasing amount of forested area for passive recreation north of WWB and increasing the access distance by approx. 650 feet (between easternmost parking area and new fishing/canoe/kayak area) results in similar effects as Alternative 1.	Adding recreational facilities and enhancing active uses would have similar effects as Alternative 1. Compared to other alternatives, Alternative 4 has less effect on forested areas and increases access distance by approx. 600 feet (between proposed parking area and new fishing/canoe/kayak area) resulting in an adverse, local, long-term, minor effect.	Distance between existing parking area and access to shoreline is approx. 340 feet.		
Environmental Justice	There would be no disproportionately high populations. Changing the finishing pier to southeastern edge of the park, within 200 park users, including the minority fishing	No Impact					
Soils	soils intact. Most existing soil is fill mater	park users, including the minority fishing populations, benefit from improved recreational facilities. Generally, little effect on soils as grading activities would primarily result in the placement of clean fill material on top of existing soils, thus leaving the existing soils intact. Most existing soil is fill material dredged from the Potomac River, deposited circa 1910, and consisting mostly of poorly-drained silt loam. Effects are expected to be adverse, site-specific, short-term, and negligible.					

Topic	Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)	Alternative 2 (VDOT "Access Option 5" dated 9/28/04)	Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)	Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)	No-Action Alternative		
Wetlands and Waters of the U.S.	Affects approx. 14,810 s.f. (0.3 acre) Effects would be adverse, site-specific, short-term, and minor.	Affects approx. 20,900 s.f. (0.5 acre) Effects would be adverse, site- specific, short-term, and minor.	Affects approx. 15,923 s.f. (0.4 acre) Effects would be adverse, site- specific, short-term, and minor.	Affects approx. 15,680 s.f. (0.4 acre) Effects would be adverse, site- specific, short-term, and minor.	No Impact		
Vegetation	To enable safe erection of large structural steel for the new inner loop span of the WWB, a large crane will be staged at certain critical lift points along Jones Point Park I removal of 1 tree > 24 inch dbh and trimming or removal of 13 trees < 24 inch dbh, overhanging Jones Point Park Drive between Royal Street and Lee Street, where pote construction equipment at certain critical lift points may occur. The action alternatives would have additional impacts, as follows:						
	Common among all action alternatives:	1.0 acre of forest impact and 2 trees > 24	inch dbh to expose the historic shipway fo	or interpretation purposes.	Spread of the invasive		
	Removes approx. 4.1 acres of forest including up to 3 trees >24 inch dbh. Removes invasive porcelain berry vine. Effects would be adverse, site-specific, long-term, and moderate.	Removes approx. 4.6 acres of forest including up to 1 tree >24 inch dbh. Removes invasive porcelain berry vine. Effects would be adverse, sitespecific, long-term, and moderate.	Removes approx. 3.5 acres of forest including up to 1 tree >24 inch dbh. Removes invasive porcelain berry vine. Effects would be adverse, sitespecific, long-term, and moderate.	Removes approx. 1.7 acres of forest including up to 1 tree >24 inch dbh. Removes invasive porcelain berry vine. Effects would be adverse, sitespecific, long-term, and minor.	porcelain berry vine would result in continued loss of forest habitat.		
Terrestrial Habitats and Wildlife			r forest and forest edge birds and other wi e park. Effects are expected to be adverse		No Impact		
Noise	have not been completed, experience sho in predicted noise levels. Therefore, the	Vehicular and aircraft noise would dominate the noise conditions in and around JPP and exceed noise generated by recreational uses. Although specific studies have not been completed, experience shows that recreational noise is not anticipated to increase over current ambient measurements and would not lead to increases in predicted noise levels. Therefore, the action alternatives are expected to have an adverse, site-specific, long-term, minor effect on noise within JPP or to adjacent areas. Construction activities have the potential to temporarily increase the noise levels in the vicinity of the work areas.					
Historic/Archeological Resources	The action alternatives would rehabilitate that protects the cornerstone. Therefore, site-specific, short-term, minor impact or land surface that would close the site to p National Historic Landmark Historic Dis be No Adverse Effect on either district.	Severe, long-term, adverse impacts to historic resources due to continued deterioration of these resources.					
Utilities	The action alternatives would have an adpark improvements. The addition of new office/comfort station.	No Impact					

Topic	Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)	Alternative 2 (VDOT "Access Option 5" dated 9/28/04)	Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)	Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)	No-Action Alternative
Safety and Security	Perimeter barriers prevent vehicles from entering within an 80-foot distance surrounding the WWB and increase public safety and security. The action alternatives are expected to have a beneficial, site-specific, long-term, moderate impact on safety and security.				
Indirect and Cumulative Effects	existing drainage problem (flooding of flooding from the Potomac River. Th	would be improved. Two existing drainage roads due to inadequate pipe sizes) with e proposed improvements would not incept on stormwater flow in JPP by expand	in the park. JPP would continue to floo rease flooding from the Potomac River.	d above the 10-year storm event due to The action alternatives would have a	Existing drainage patterns would remain the same, and the roads would flood at less than the 10-year storm event due to inadequate culvert sizes to handle the site runoff.

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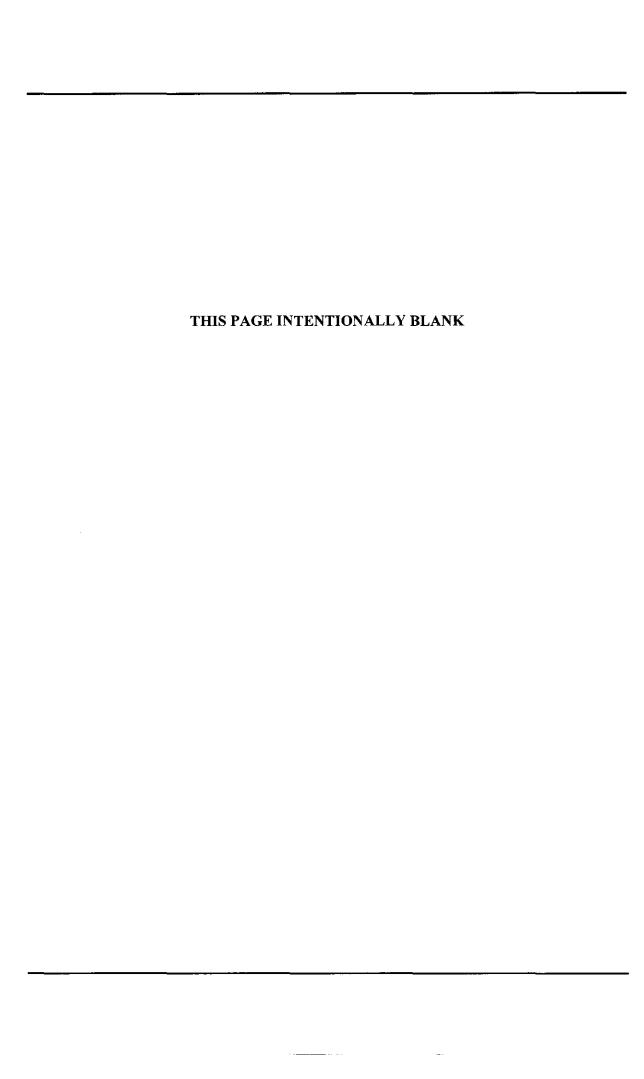
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1.0 PURPOSE AND NEED FOR ACTION

The NPS proposes to improve and enhance JPP, located in the southeastern corner of the City of Alexandria, Virginia. The project includes recreational features, an interpretive plan related to cultural resources, and proposed modifications to parking and access within the park. The elevated WWB traverses JPP. The FHWA has approved improvements to the WWB and affected interchanges within a 7½-mile portion of the Capital Beltway (I-95/I-495). The proposed improvements to JPP are mitigation commitments to the NPS from FHWA for impacts to the park from the WWB Replacement Project.

The NPS signed the initial JPP EA on September 10, 2001. Terrorists attacked on September 11, 2001 crashing commercial airplanes into the World Trade Center in New York City, the Pentagon in Washington, D.C., and a field in Pennsylvania. The initial EA, which evaluated three action alternatives: Alternatives 1, 2 and 3, was circulated for public comment between January 11, 2002 and February 11, 2002. In August 2003, the federal TSA performed a vulnerability assessment and recommended the removal of all parking from beneath the new WWB. After careful evaluation of the risks of parking in JPP, a recommendation was set forth to eliminate all parking and vehicular access within 80 feet of the north and south parapet driplines of the new WWB. There could be an exception for special events if the predefined security measures have been put in place for vehicle inspection assuring safety of the bridge structure.

TSA's recommendation, endorsed by the FHWA and accepted by the MSHA, the VDOT, the City of Alexandria, and the NPS (owner of JPP) has resulted in the need to reassess the parking, access, and security components of the park design. This EA evaluates four action alternatives that address parking, access, and security issues in JPP.

The need for the proposed action is based on:

- The lack of a current comprehensive management plan for JPP.
- Required mitigation commitments for impacts from the WWB Replacement Project (protection of JPP resources and recreational opportunities).
- Required security measures in JPP due to recommendations contained within the Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project (June 2002).

The primary purposes of the proposed action are to:

- Develop a long-range plan for JPP.
- Identify desired resource conditions and visitor experiences.
- Consider feasible alternatives for future development of JPP.
- Provide educational and recreational opportunities for visitors while protecting park resources.

This EA analyzes the potential impacts resulting from the construction of new parking areas, turnaround and access roads, recreational improvements, and perimeter barriers that are proposed in JPP. Jones Point Park Drive was closed to public use in May 2006 due to demolition of the existing WWB. The construction contracts for JPP parking, access, and security improvements are anticipated to be awarded in summer 2007 with vehicular access reinstated in JPP by the end of 2007. The construction of the park improvements is not likely to begin until the second WWB span is completed in 2008. The access to the southern portion of the JPP would remain open at all times.

This EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the regulations of the Council on Environmental Quality (CEQ) for implementing the Act (40 CFR 1500-1508), the NPS Director's Order 12 (Conservation Planning, Environmental Impact Analysis, and Decision-making, 2001), and the National Historic Preservation Act (NHPA) of 1966, as amended.

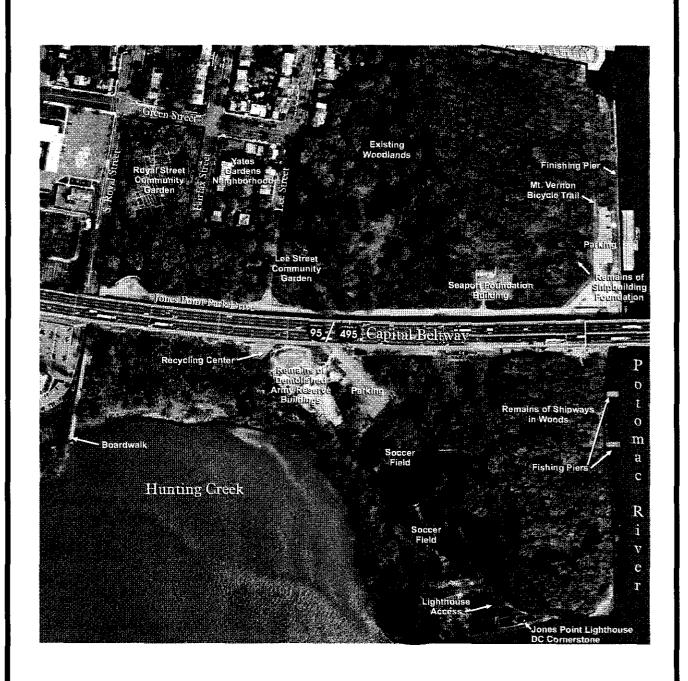
2.0 BACKGROUND

A. JPP Description

JPP is an approximately 65-acre park located in the southeastern corner of the City of Alexandria that is owned by the NPS under the jurisdiction of the George Washington Memorial Parkway. JPP contains many recreational amenities such as multi-use fields, natural areas, a finishing pier (used for fishing activities), historic resources, pedestrian trails, and bike paths (Figure 1). A Final Environmental Impact Statement (FEIS)/Section 4(f) Evaluation in 1997 and a Final Supplemental Environmental Impact Statement (FSEIS)/Section 4(f) Evaluation in 2000 fully documented studies of the WWB Replacement Project, including JPP.

An approximately 10-acre parcel of land that contains the WWB is within JPP (Figure 2). This land is owned by the United States and is under the jurisdiction of the FHWA (formerly Bureau of Public Roads). The FHWA granted an easement encompassing approximately 9 acres of land to the VDOT for the purpose of maintaining the existing WWB until the bridge is replaced. Although FHWA permitted free use of this land as a public convenience for parking and access from Royal Street, the land under and around the existing WWB has never been owned by a park agency, designated as a park, or used for recreational purposes. Therefore, FHWA's land under and around the WWB is not eligible for Section 4(f) consideration.

To facilitate construction and maintenance of the new WWB, the FHWA conveyed approximately 10 acres of land under their jurisdiction to the NPS for park and recreational uses. The result of this conveyance increased the size of JPP to an approximate total of 65 acres and consolidated three discontiguous areas of JPP under the sole jurisdiction of the NPS. However, VDOT maintained a perpetual easement that is approximately 5 acres larger than the current bridge easement (Figure 3). To compensate for the larger permanent easement under and around the new bridge, the FHWA would improve and enhance this portion of JPP so that the area would be useable and functional parkland suitable for recreational uses not currently available.



For illustrative purposes ONLY.

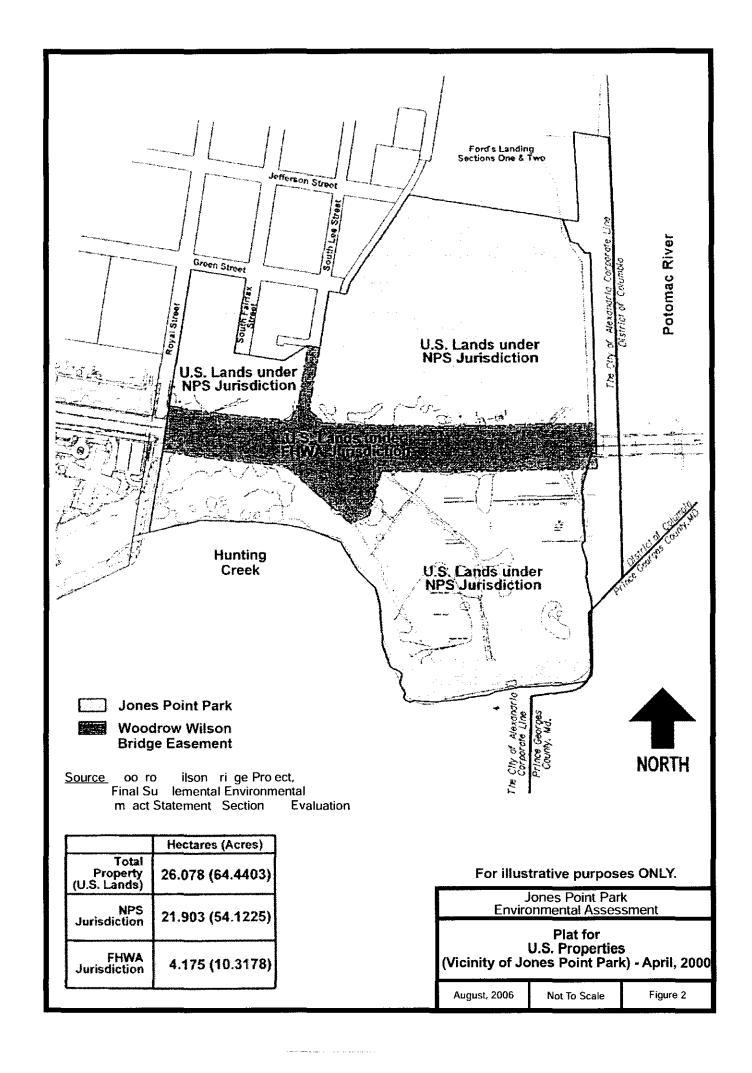
Jones Point Park Environmental Assessment

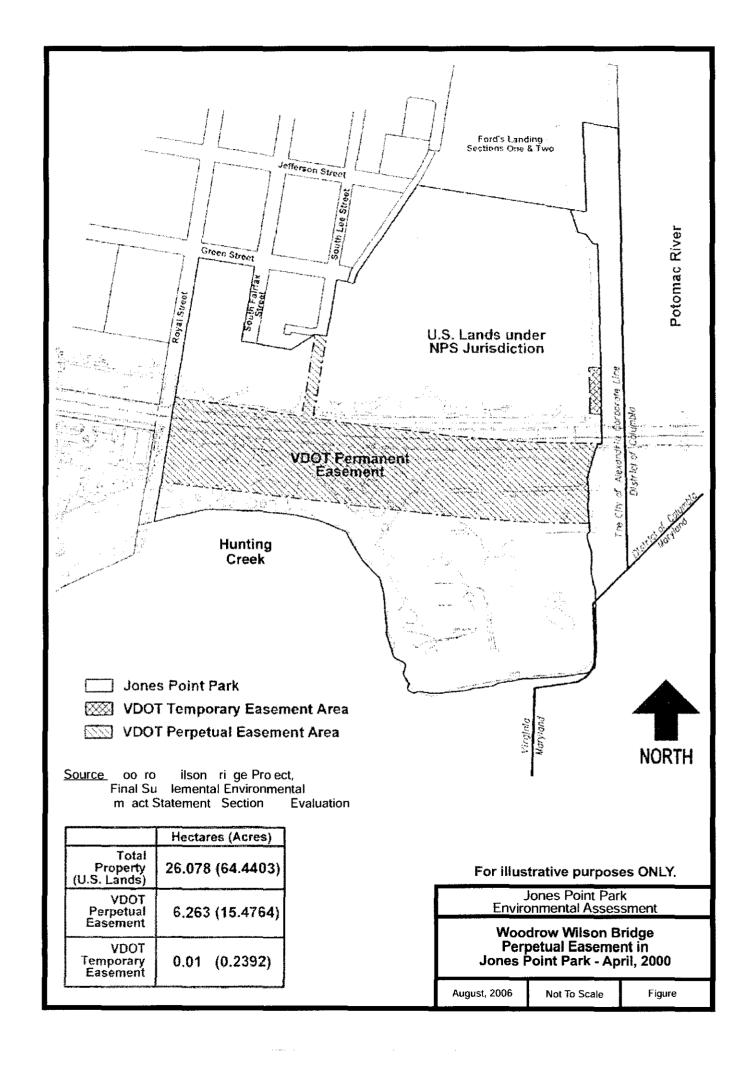
Preconstruction Conditions June, 2001

August, 2006

Not To Scale

Figure 1





B. Summary of Park Program and Design

The proposed improvements to JPP would consist of several elements: a vehicular entrance area to the park at the end of Royal Street; parking areas located north of the WWB; forested areas; active recreational area/multi-use field(s); and a waterfront area along the Potomac River and Hunting Creek. The City of Alexandria would prepare a long-range plan for use of the multi-use fields and access to the Potomac River. JPP proposed improvements include:

Recreational Elements

- Realign the entrance road to the park, which would include landscaping the area between the entrance road and the new WWB to soften the appearance of the bridge structure and installing a park manager's office/comfort station, a park information sign, paved and unpaved trails, and other amenities such as bike racks and water fountains.
- Improve the shoreline, including extending the bulkhead under the new bridge and stabilizing the shoreline near the D.C. South Cornerstone and the Jones Point Lighthouse.

Cultural Resource Elements

• Enhance historic site elements, which would include the rehabilitation and preservation of the Jones Point Lighthouse and the D.C. South Cornerstone, and the interpretation of centuries of human occupation within Jones Point beginning with Native American occupations thousands of years ago, concluding with interpretation of 20th century park elements including the WWI Virginia Shipbuilding Corporation (VSC) site.

Natural Resource Elements

- Minimize impacts to wetland areas and provide environmental interpretation of wetland areas where appropriate. Mitigate wetland loss on-site and off-site at a 1:1 replacement rate.
- To the extent possible, preserve existing woodland areas north of the bridge. Mitigate tree loss through additional plantings of native species of trees, shrubs and herbs.
- Manage woodland by controlling invasive plants, removing hazardous trees, and properly pruning mature trees.
- Emphasize a landscape of mixed native grasses, herbaceous and small woody plants as part of the historic theme while minimizing mulch beds and ornamental plants.

Security Elements

• Consider perimeter barrier concepts with the following general parameters: an 80-foot distance measured from the north and south parapet driplines of the new WWB, a

retractable vehicular barrier for bridge tender, emergency, security, and maintenance vehicle access, and a guardhouse at the end of Royal Street. (Any proposed perimeter barrier system must not impact any of the archeologically significant elements on the site).

• Consider perimeter security devices including: a wall system, bollards, dense plantings, a "ha-ha" wall (depressed wall with slope), a reinforced fence, boulders, and reinforced bleacher seating.

C. Summary of JPP Planning Process

This EA focuses on a group of alternatives identified through an interactive process that incorporated the input of the NPS, VDOT, MSHA, the City of Alexandria, JPP Stakeholder Participation Panel, regional and state government agencies; consultants; and the general public. This interactive process provided the basis of the JPP planning process, the overall goal of which is to create a park that:

- Balances natural, recreational and cultural resources and opportunities.
- Integrates the new WWB as an important element of the park's design.
- Addresses security issues in response to TSA recommendations.

The WWB FEIS was published in 1997. The ROD identified WWB Current Design Alternative 4A (Side-by-Side Drawbridges) as the Selected Alternative, requiring VDOT to maintain a perpetual easement under and around the new bridge that is approximately 5 acres larger than the current bridge easement.

On January 30, 1998, the City of Alexandria filed a civil action against the U.S. Department of Transportation that challenged the 1997 ROD. A Settlement Agreement stated, among other terms, that redevelopment of JPP (e.g. uses, design, materials) would be in accordance with the design programs for the Urban Deck, George Washington Memorial Parkway (GWMP) approaches and JPP, as shown on the documents entitled Design Program for JPP North Section, Design Program for JPP South Section, and Design Program for Proposed Urban Deck and Gateway Concept (refer to the Settlement Agreement Between the City of Alexandria, Virginia and the United States Department of Transportation, March 1999).

On February 9, 1999, the Alexandria City Council adopted Resolution No. 1908 that stipulates, in part, that the redevelopment of JPP would be in accordance with specific design programs developed by staff of the City of Alexandria Department of Planning and Zoning. The City Council referred to design programs such as Design Guidelines for Jones Point Park and the Urban Deck (City of Alexandria, December 1998) and Historic Context and Recreation Issues for Jones Point Park, the George Washington Memorial Parkway and Urban Deck (City of Alexandria, January 1999) that recommended replacing the two soccer fields, though not necessarily in the present location, as the bridge expands to the south.

The WWB FSEIS was published in April 2000. On December 8, 2000, the Alexandria City Council recommended that it approve the design concept plans for JPP with the following modifications:

- Approve the interim plan for JPP with the understanding that the two multi-use fields would be modified to accommodate the retention of the woodland area.
- Approve the final plan for JPP with the following modifications: (a) reduce the size of the two multi-use fields north of the new WWB from 120 x 75 yards to 110 x 60 yards; (b) change the alignment of the western field from a north-south to an east-west direction; and (c) eliminate the secondary bike path that runs through the woodland area to the north of the bridge.

The NPS signed the JPP EA on September 10, 2001 that served as a comprehensive management plan for future development of JPP. However, because of the circumstances surrounding the terrorist attacks on September 11th, the NPS did not finalize the 2001 EA recommendations. Since then, extensive coordination has occurred between the NPS, the City of Alexandria, and the FHWA to further develop the mitigation and enhancement plan for JPP. The JPP Development Group comprised of the NPS, City of Alexandria, and other stakeholders recommended a number of key design and programmatic goals and objectives for JPP based on continuing studies for the park. Some of these goals and objectives include:

Recreation

- Reconfigure and relocate the existing soccer fields to an area north of the proposed WWB.
- Provide a large, open events lawn south of the proposed WWB and study the inclusion of a possible stage/presentation area (either naturally built into the landscape or a removable facility).
- Provide uses in addition to parking under the bridge such as rollerblade/skateboard area, hard surface courts for active sports, or other appropriate uses.
- Maintain one fishing pier.
- Develop a new pier and a canoe/kayak access area.
- Maintain the existing community gardens north of the proposed bridge in the Lee Street vicinity.
- Provide a children's play area (tot lot) north of the bridge.
- Provide an interpretive area south of the bridge.

Historic

• Develop an interpretive program for site history including federal, military, industrial, environmental and Native American history.

- Study and complete the repair and rehabilitation of the Jones Point Lighthouse and D.C. South Cornerstone, including the historic seawall, lawn, and picket fence around the JPP Lighthouse and D.C. South Cornerstone to provide appropriate public access and allow for improved treatment and long-term protection of these historic resources.
- Create a physical representation of the location of the D.C. boundary line, on site, that may include a series of equally-spaced stone markers.
- Provide for stabilization, preservation, and interpretation of the VSC's southern shipway.
- Install pedestrian access to the shipway and historic interpretive elements illustrating the scale and nature of shipbuilding, walkways and other site furnishings that reinforce the shipbuilding theme.
- Provide interpretive element(s) for the finishing pier including signage or other site features.
- Interpret Native American history, archeological resources, the ropewalk, military history, as well as other appropriate historic information and create a climbing and play area along the ropewalk (as appropriate to resource preservation).
- Create an historic interpretive area that features the original portion of the Potomac River/Hunting Creek shoreline.

Natural Areas and Features

- To the extent possible, preserve existing woodland areas north of the bridge. Manage woodland by controlling invasive plants, removing hazardous trees, and properly pruning mature trees.
- Mitigate tree loss through additional plantings of native species of trees, shrubs and herbs. Mitigate wetland loss on-site and off-site at a 1:1 replacement rate.
- Mitigate wetland loss on-site at a 1:1 replacement rate. All alternatives except the No-Action Alternative include loss of forest cover and at least 0.34 acres of wetland loss which must be mitigated according to NPS Director's Order 77-1 standards.
- Manage the existing woodlands south of the proposed bridge by controlling invasive species and plants, removing hazardous trees, and properly pruning mature trees.
- Emphasize a landscape of mixed native grasses, herbaceous and small woody plants as part of historic theme while minimizing mulch beds and ornamental plants.
- Minimize impacts to wetland areas and provide environmental interpretation of wetland areas where appropriate.
- Selectively clear vegetation of shoreline along the river on the eastern edge of the park to improve views and vistas of the river.
- Stabilize degraded shoreline areas with appropriate natural methods and minimize impacts to environmentally sensitive areas.

Circulation

Pedestrian/Bicycle:

- Provide enhanced park entrances at the south end of Lee Street and at the intersection of Lee Street and Green Street.
- Maintain and improve walkways along Royal Street.
- Study options for inclusion of the Mt. Vernon Trail through the park including along the shoreline.
- Create a promenade on the finishing pier along the eastern edge of the park by widening and paving the pier, and by clearing surrounding vegetation.
- Create an east-west path through the site connecting the federal District Line walk to the Potomac River walk at the northern end of the VSC finishing pier.
- Provide shore and pier access in select locations.

Vehicular:

- Provide a vehicular entrance to the park at Royal Street.
- Provide sufficient parking (110 spaces) for park patrons and bridge operator (tender).

Security:

The NPS, FHWA, and VDOT developed the project's security measures in response to the *Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project* (June 2002) and to achieve the following goals:

- Identify and quantify recommended security measures for access to and parking in JPP. Security measures were not analyzed in the previous environmental documentation, so the analysis has been included as part of this EA.
- Integrate perimeter barriers into the design for access and parking in JPP. The NPS has used other perimeter barriers in the region (Washington Monument, Lincoln Memorial) by use of security-enhanced walkways, retaining walls, and berms.

JPP Interpretive Plan

Since January 2001, the FHWA has worked with an Interpretive Plan Group for Cultural Resources (comprised of representatives of the NPS, the City of Alexandria Department of Recreation, Parks and Cultural Activities, Office of Historic Alexandria, and the City of Alexandria Archeology Commission) on the development of a comprehensive interpretation plan for JPP. This work developed critical components of the interpretive plan, especially as these elements relate to interpretive signage in the park. The Interpretive Plan Group has recommended 13 locations for interpretive elements in JPP and presented designs for such elements as a central orientation "hub," entryway signage, and the design of interpretive panels

and supports. The Interpretive Plan is available for inspection at the WWB Replacement Project office.

D. Relationship to Other Plans and Planning Activities

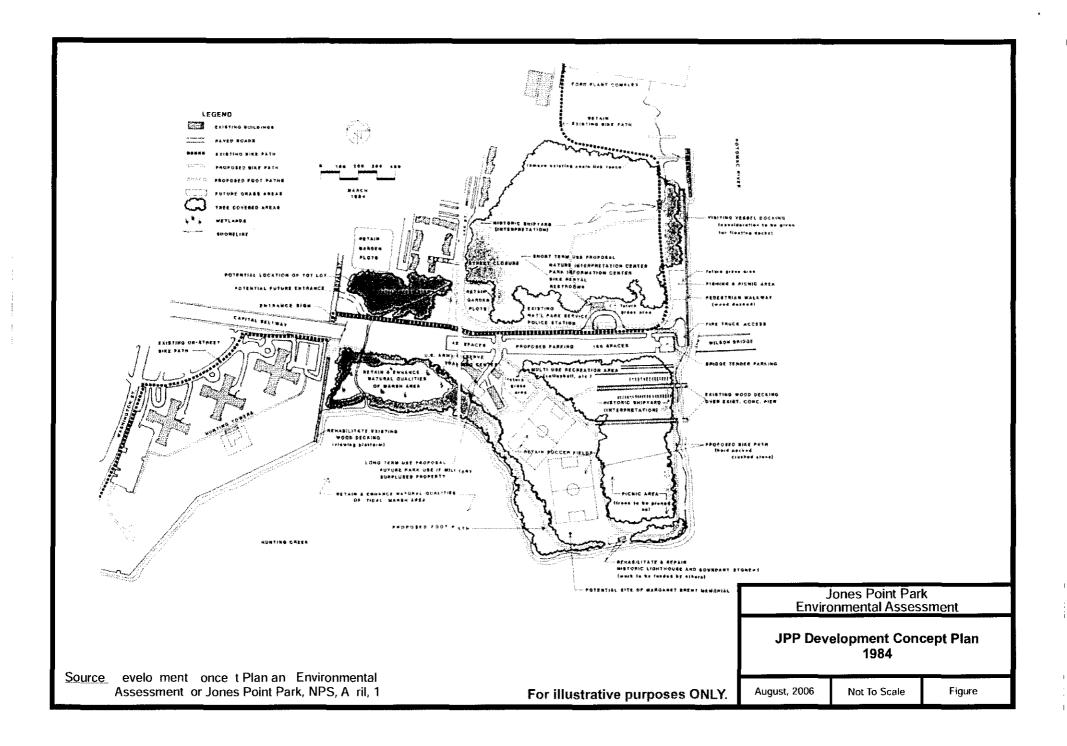
This EA is procedurally connected to the 1997 FEIS and the 2000 FSEIS for the WWB Replacement Project, and addresses the mitigation commitments outlined in the 1997 MOA and ROD prepared for the WWB Replacement Project. The MOA was signed by officials of the FHWA, the NPS, the Advisory Council on Historic Preservation (ACHP), the SHPOs of Virginia, Maryland, and the District of Columbia, as well as representatives of a number of concurring parties, including the VDOT, the MSHA, the City of Alexandria, the Maryland-National Capital Park and Planning Commission (M-NCPPC), Prince George's County, and the Mt. Vernon Chapter of the Daughters of the American Revolution (DAR).

This EA addresses the impacts of improvements to JPP relative to the 1984 Development Concept Plan that was prepared by the NPS and the City of Alexandria to preserve, protect, and enhance the natural and historic character of JPP. The Development Concept Plan indicated that park improvements would be directed toward fulfilling the following overall goals:

- Provide expanded recreational opportunities for all citizens.
- Improve the quality of recreational opportunities for all citizens.
- Provide for the safety and security of all park visitors.
- Provide an opportunity for understanding the natural and historic environment of the park.
- Ensure that all improvements are aesthetically and ecologically compatible with the natural, historic and recreational resources of the park.

Figure 4 illustrates the proposed plan for JPP as contained in the 1984 Development Concept Plan. The Development Concept Plan proposed:

- Converting the site of the NPS Police Station to public uses (to be removed as part of the WWB Replacement Project).
- Consolidating parking under the WWB.
- Creating a multi-use recreation area and tot lot.
- Creating a new footpath connecting to the existing Mt. Vernon Trail and continuing through the forest in the northern portion of JPP.
- Creating new bike and footpaths in the southern portion of the park.
- Retaining the existing soccer fields in their current locations in the southern portion of the park.



Although the 1984 Development Concept Plan recommended retaining the existing soccer fields in their current locations in the southern portion of the park, the Alexandria City Council adopted Resolution No. 1908 (February 9, 1999) and its December 2000 recommendations to accommodate two 110 x 60 yard multi-use fields on the north side of the bridge, re-orient the direction of the western field, and eliminate the secondary bike path. The goal of the City's resolution and recommendations, supported by the City of Alexandria's Department of Recreation, Parks and Cultural Activities and the Park and Recreation Commission, was to separate active and passive recreation by keeping passive activities (i.e. historic interpretation) to the south of the bridge and active recreation on the north side.

The ROD, prepared by FHWA, identified the WWB action alternative that was selected in the FSEIS (Alternative 4A – Side-by-Side Drawbridges) and identified various measures to minimize harm to natural and cultural resources. The ROD outlined the design goals for proposed improvements to JPP, the identification, evaluation and treatment of cultural resources (historic properties and archeological resources), and mitigation measures for potential impacts to natural resources.

The MOA contained mitigation measures that lessen the potential adverse effects on cultural, historic and archeological resources due to the WWB Replacement Project (including JPP improvements). The MOA identified specific recommendations and design goals that the development process must follow for the WWB and the JPP improvements.

The NPS circulated the initial JPP EA for public comment between January 11, 2002 and February 11, 2002. In August 2003, the federal TSA performed a vulnerability assessment of the WWB that resulted in the need to reassess the parking, access, and security components of the JPP design.

In September 2004, the JPP Stakeholder Participation Panel recommended that the City of Alexandria and the NPS move forward with the JPP improvements. This panel, comprised of individuals that were nominated by the City of Alexandria and who represented the local community, met during 1999 to provide input and feedback on features and design concepts for JPP improvements. At the same time, the City of Alexandria's Neighborhood Task Force for the WWB Replacement Project considered the concepts and provided its own recommendation to the City of Alexandria and the NPS.

In June 2005, the Alexandria City Council voted to recommend "Scheme A" as their preferred alternative for consideration in the EA. Scheme A, renamed Alternative 1 in this EA, accommodates 110 parking spaces in JPP between Royal Street and Lee Street, although it does not provide special event parking.

In this document, the NPS has identified Alternative 4 as the Preferred Alternative for JPP improvements based on park needs, input from various study teams, public comments, and reduced environmental impacts. The proposed improvements to JPP fulfill the objectives of the 1984 Development Concept Plan and the 2001 JPP EA which are to enhance recreational opportunities in the park. The proposed action would address security issues in JPP and minimize the potential effects of improvements as part of the mitigation measures outlined in the ROD and the MOA established for the WWB Replacement Project.

E. Summary of Initial Alternatives to Address Security Recommendations

The following summarizes the initial alternatives that were considered in response to security recommendations contained in the *Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project* (June 2002).

JPP Design Chronology (August 7, 2002 to Present)

During the period from August 2002 to present, more than 35 design concepts were prepared as a result of the recommendations contained in the *Vulnerability Reduction Design Considerations* for the Woodrow Wilson Bridge Replacement Project (June 2002). All of these design concepts eliminated public parking and vehicular access under the new WWB and within an 80-foot distance measured from the north and south parapet driplines of the bridge. However, the proposed design concepts did accommodate "special event parking" beneath the bridge that would require additional security measures to be provided by the City of Alexandria.

The majority of the design concepts proposed public vehicular access from Royal Street. A few of the design concepts proposed public vehicular access from either Fairfax Street or Lee Street as alternatives to the current park access via Royal Street. In all cases, public vehicular access was limited to the north side of the bridge.

All of the initial design concepts provided a minimum of 110 parking spaces for park users to be located north of the new WWB (current Alternative 4 provides 81 parking spaces because it uses the same footprint as the existing interim parking area). Parking was proposed in a number of configurations including along the JPP access road, along Royal Street and Lee Street, and in parking areas within JPP. In addition, at least one design concept proposed a joint use/shared parking structure. The parking structure was to be located south of the Virginia bridge abutment, at the northeast portion of the Hunting Towers residential site.

The design concepts also included a number of alternatives that were illustrated in the previously approved "Ultimate Improvements" plan for JPP. The approved plan proposed several configurations for the multi-use fields: one field oriented north-south and the other field oriented east-west; two fields north of the bridge oriented in an east-west direction; fields beneath the bridge; and one field proposed on the event lawn south of the bridge (in combination with a field either beneath or north of the bridge).

The tot lot and the canoe/kayak launch, in some of the design concepts, were proposed in locations different from the approved park plan. The tot lot was proposed in the original location, west of the original location, or beneath the WWB. In some design concepts, the canoe/kayak launch was relocated north of the bridge.

A number of the design concepts proposed new athletic facilities such as additional play courts, tennis courts, volleyball courts, and an in-line hockey facility beneath the bridge. However, since the TSA recommended the elimination of public vehicular access and parking under the WWB, these design concepts have been eliminated from further consideration.

This EA assesses the perimeter barriers associated with the current four design concepts: Alternatives 1, 2, 3, and 4. These perimeter barriers were illustrated no closer than 80 feet from the north and south parapet driplines of the new WWB, and included a number of physical elements (i.e., bollards, walls, fences, landscape plantings) to preclude vehicular movement into the restricted bridge area. All of the current design concepts would facilitate security, maintenance, and bridge tender access into the restricted bridge area.

F. Issues and Impact Topics

<u>Issues</u>

This EA addresses the following issues that were identified from previous park planning efforts, input from various interested public groups and individuals, and input from local, state, and federal agencies:

- Natural Resources: Effects on wetlands, vegetation, wildlife, and soils.
- Cultural Resources: Effects on historic and archeological resources including the Jones Point Lighthouse, the D.C. South Cornerstone, the Alexandria National Historic Landmark Historic District, and the Alexandria National Register Historic District.
- Surface Hydrology: Drainage patterns and the effect on adjacent residences.
- Visual and Aesthetic Conditions: Effects from the removal of existing vegetation.
- Visitor Use and Experience: Active versus passive recreational opportunities in JPP. "Impairment" of park resources under the NPS Organic Act of 1916. Effects on visitor use such as recreational fields, forested areas, and circulation of pedestrians, vehicles and bicycles.
- Environmental Justice: Effects on minority populations that fish on the finishing pier (location of the proposed promenade/boardwalk).
- Security: Effects on park access and security with regard to the federal TSA's recommendations contained in the *Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project* (June 2002).

Impact Topics Included In This Document

Impact topics are specific resources of concern that could be beneficially or adversely affected by implementing one of the project alternatives. The following impact topics were identified based on federal laws, regulations and orders, NPS Management Policies, and knowledge of limited or easily impacted resources in the project area:

Neighborhoods, Community Facilities, and Services: The City of Alexandria contains many community facilities and services including fire, police, schools, hospitals, and libraries. The proposed project is not anticipated to directly affect community facilities and services located outside of JPP; therefore, they are not addressed in this EA. However, the project area does include two community gardens,

- a recycling center, and is in close proximity to the Yates Gardens neighborhood. This EA considers effects to the community gardens, recycling center, and parking in the park. Potential visual effects to the Yates Gardens neighborhood appear under "Visual and Aesthetic Conditions".
- Visual and Aesthetic Conditions: JPP contains both natural and developed recreational areas that offer visitors an aesthetically-pleasing setting. The alternatives would have short- and long-term visual impacts; therefore, this EA considers impacts to aesthetics and visual resources.
- Visitor Use and Experience: Protecting and managing park resources for the enjoyment of future generations is the fundamental purpose of the 1916 NPS Organic Act. The existing recreational uses of JPP include fishing, natural areas, cultural and historical resources, pedestrian trails, bike paths, and soccer fields. This EA addresses how recreational values would be enhanced as part of this project while protecting park resources for future generations.
- Environmental Justice: Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations) requires federal agencies to identify and address any disproportionately adverse effects on human health or the human environment of minority and/or low income populations resulting from federal programs, policies and activities. Although minority and low-income populations reside in the City of Alexandria, none live within the JPP's project area. However, the project proposes changing the location that minority (and general) populations use for fishing activities. This EA considers impacts to Environmental Justice populations.
- Soils: The WWB FSEIS contained a detailed analysis of soils, including prime and unique farmland soils, as regulated under the federal Farmland Protection Policy Act (Final Rule of June 17, 1994). Overall, the proposed alternatives are expected to have no impacts on prime and unique farmland soils. The project performed an investigation of lead in shallow soils of JPP in response to concerns by a local resident that high lead levels remain in local soils, originating from historic shipbuilding operations at Jones Point. This EA contains a discussion of this topic.
- Wetlands and Waters of the U.S.: Executive Order 11990 (Protection of Wetlands) requires federal agencies to minimize the loss, destruction or degradation of wetlands and to enhance their natural and beneficial values. The 2001 NPS Management Policies, Director's Order 2 (Planning Process Guideline) and Director's Order 12 (NEPA Guideline) provide direction on developments proposed in wetlands. This EA considers impacts to wetlands within JPP.
- Vegetation, Terrestrial Habitats, and Wildlife: The following acts and orders provide general direction regarding the protection of naturally occurring plant communities: the NEPA of 1969; the 1916 Organic Act, 2001 NPS Management Policies, NPS Director's Order 12 (NEPA Guideline), NPS Director's Order 77 (Natural Resource Management Guideline), GWMP Resource Management Plan, and other NPS and park policies. This EA considers impacts to forested areas, individual trees, and wildlife within JPP.

- Noise: The Federal-Aid Highway Act of 1970 regulates highway traffic noise for federally-aided highway projects (23 CFR Part 772). This law mandates the FHWA to develop noise standards for mitigating highway traffic noise. The VDOT has developed a noise policy, which has been approved by FHWA. The action alternatives locate the parking areas closer to residential areas; therefore, this EA considers noise effects.
- Cultural Resources: The following acts and orders provide general direction regarding the protection of cultural resources: the NHPA of 1966; the NEPA of 1969, the 1916 Organic Act; 2001 NPS Management Policies, GWMP Resource Management Plan, and other NPS and park policies. The MOA identifies how the effects on cultural resources from the WWB Replacement Project (including JPP) would be handled. The treatment plans for cultural resources would be the same for all JPP park improvement alternatives described in this EA. Since the NPS signed the MOA, it will continue to use the MOA as a tool to mitigate any potential impacts to cultural resources that could occur with the WWB Replacement Project and any JPP improvements. The MOA appears as Appendix F of this document.
- Utilities: The action alternatives would impact existing water and sanitary sewer lines, electrical power and communication facilities. This EA considers impacts to utilities.
- Safety and Security: The Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project (June 2002) recommended that vehicles be restricted from access and parking beneath the new WWB, and that an 80-foot distance should be established from the north and south parapet driplines of the new WWB. This EA considers potential security measures.
- Indirect and Cumulative Effects: The WWB FSEIS contained a detailed analysis of indirect and cumulative effects. However, the NPS has received questions from the public regarding potential effects on natural drainage patterns and stormwater flow. This EA considers indirect and cumulative effects regarding surface hydrology.

Topics Not Included In This Document

The Woodrow Wilson Bridge Replacement Project Final Supplemental Environmental Impact Statement/Section 4(f) Evaluation (FSEIS) evaluated each of the following topics. The proposed alternatives would have no effect, a negligible effect, or a minor effect for each of the following topics. Therefore, this EA does not further analyze the following topics.

- Land Use: The improvements to JPP will not affect any existing land use or zoning because the existing recreational function of the park would not change. Therefore, this EA does not evaluate land use.
- Socio-Economic Environment: There would be no residential or business displacements due to construction or implementation of any of the alternatives. Some employment opportunities and related revenue for construction materials are anticipated during construction of the park improvements. The WWB FSEIS contained a quantitative review of the socio-economic environment and the proposed

- project is expected to have only minor effects; therefore, this EA does not further analyze this topic.
- Surface and Ground Water Resources: The 1972 Water Pollution Control Act, as amended by the Clean Water Act of 1977 establishes a national policy to restore and maintain the chemical, physical and biological integrity of the nation's waters; to enhance the quality of water resources; and to prevent, control, and abate water pollution. The WWB FSEIS indicated that, as a public road project, the project is exempt from the provision of the Chesapeake Bay Preservation Area Designation and Management Regulations (Virginia Administrative Code 9VAC10-20 et seq.) as long as Erosion and Sediment Control plans and stormwater management plans are prepared and approved as part of the final design. Erosion and sediment control measures would comply with City of Alexandria Standards and the Virginia Erosion and Sedimentation Control Handbook.

The City of Alexandria is within the jurisdiction of the Virginia Coastal Resources Management Program. Through this program, the Virginia Department of Environmental Quality would make a consistency determination and, upon approval, issue a signed, authorized state and federal Section 401/404 permit. The 2001 NPS Management Policies provide direction for the preservation, use and quality of water originating, flowing through, or adjacent to park boundaries. The NPS seeks to restore, maintain, and enhance the quality of all surface and ground waters within its parks consistent with the Clean Water Act and other applicable federal, state and local laws and regulations. The WWB FSEIS contained a detailed analysis of surface and ground water quality; the current project alternatives would not alter the analysis and conclusions contained in the FSEIS. Therefore, this EA does not further analyze this topic.

- Floodplains: Executive Order 11988 (Floodplain Management) requires an examination of the impacts and potential risk involved in placing facilities within floodplains. The Section 401/404 permit for the WWB Replacement Project includes impacts to floodplains in JPP; therefore, this EA does not further analyze this topic.
- Species of Special Concern (Rare, Threatened and Endangered Species): The Endangered Species Act (16 USC, 1531 et seq.) mandates that all federal agencies consider the potential effects of their actions on species listed as threatened or endangered. If the NPS determines that an action may adversely affect a federally-listed species, consultation is required with the USFWS so that the action would not jeopardize the continued existence of the species or result in the destruction or adverse modification of its critical habitat. NPS policy (Director's Order 77) requires an examination of the impacts to state-listed threatened or endangered species and federal candidate species.

The USFWS, Virginia Department of Conservation and Recreation, Virginia Department of Game and Inland Fisheries, and Virginia Department of Agriculture and Consumer Services were contacted regarding the presence of rare, threatened and endangered species in JPP. According to records of these agencies, no such species have been identified in JPP and no rare, threatened or endangered species were observed during fieldwork in JPP. Since the proposed improvements to JPP would not

- impact federal- or state-listed species of special concern, this EA does not further analyze this topic.
- Air Quality: The Clean Air Act, as amended (42 U.S.C. 7401 et seq.), requires the federal land manager (park superintendent) to protect the park's air quality-related values including visibility, plants, animals, soils, water quality, cultural and historic resources and objects, and visitors from adverse air pollution impacts. Section 118 of the 1963 Clean Air Act requires the park to meet all federal, state, and local air pollution standards.

The 2000 FSEIS for the WWB Replacement Project contained an air quality analysis that indicated the predicted CO levels with the project would be in compliance with the National and State Ambient Air Quality Standards (NAAQS) for the design year 2020 at all locations analyzed within JPP. As a worst case scenario, an analysis assumed that all 110 parking spaces could have vehicles leaving the park area during a peak hour. The results indicated that the CO emissions from all these vehicles leaving parking spaces and traveling to the edge of the park are in the range of 0.5 kg. The results also indicated that the effect on ambient CO levels at the closest location of the parking areas would be less than 0.05 ppm. As such, the emissions and effects of the full usage of 110 parking spaces represent only 1% over the CO emissions generated by the peak hour traffic on the WWB. As a result, it can be concluded that the effects of the full use of the parking areas would not have any major effect on the air quality of JPP, and would not change the findings stated in the 2000 FSEIS air quality analysis. No long-term degradation of air quality is expected due to the proposed JPP improvements; therefore, this EA does not further analyze this topic.

- Energy: The WWB FSEIS contained a quantitative review of direct and indirect energy consumption resulting from the operational and construction phases of the project. The current alternatives would not alter these results; therefore, this EA does not further analyze this topic.
- **Hazardous Materials**: There are no hazardous materials sites in JPP; therefore, this EA does not analyze this topic.
- Traffic and Transportation: The WWB FSEIS contained an analysis of traffic and transportation; therefore, this EA does not further analyze this topic.
- Section 4(f) Evaluation: Section 4(f) of the U.S. Department of Transportation Act of 1966, 49 USC 303(c), requires that the proposed use of land from a publicly-owned public park, recreation area, wildlife and/or waterfowl refuge, or any significant historic site, as part of a federally funded or approved transportation project, is permissible only if there is no feasible and prudent alternative to the use. Final action requiring the taking of such land must document and demonstrate that the proposed action includes all possible planning to minimize harm to the property resulting from such use. The WWB 1997 FEIS contained a complete Section 4(f) Evaluation for potential impacts to park and cultural resources, and the WWB 2000 FSEIS reevaluated the impacts to park and cultural resources in light of changes that had occurred since 1997. Both the 1997 and 2000 EISs included a conceptual mitigation and enhancement plan for JPP.

For purposes of Section 4(f), the FHWA has determined that the consideration of various alternatives for the configuration of the parking and multi-use fields within JPP would not result in an increase in the acreage of park property that would be used for the construction of the WWB beyond what was described in the 2000 ROD. The relocation of the parking area and multi-use fields within the park is considered mitigation for park impacts from the WWB Replacement Project.

The decision regarding the configuration of the parking areas and multi-use fields within JPP would be made by the NPS in accordance with their NEPA process, and all property affected by the relocation of the parking areas and multi-use fields would remain under their jurisdiction once constructed. Therefore, implementation of the mitigation is not considered a Section 4(f) use (refer to 23 CFR 771.135(p)), and a separate Section 4(f) Evaluation is not required. Further, FHWA has preliminarily determined that changes to the conceptual mitigation and enhancement plan for JPP, that are being considered in this EA, have not substantially reduced the mitigation commitments proposed for JPP in the 2000 ROD nor substantially increased adverse impacts to JPP. Therefore, a separate Section 4(f) Evaluation is not required (see 23 CFR 771.135(m)(3)) and is not included in this EA. Once the NPS makes a final decision on the alternatives under consideration and issues a decision document, FHWA would formally re-evaluate the selected alternative in light of the conceptual mitigation enhancement plan included in the 2000 FSEIS to determine if additional NEPA work is needed.

3.0 DESCRIPTION OF ALTERNATIVES

A No-Action Alternative and four parking and access concept designs (action alternatives) were considered for JPP. The No-Action Alternative maintains existing conditions in JPP but will not be carried forward as it does not fulfill the Purpose and Need for the project (refer to Chapter 1.0 of this document), the NPS resource management goals for JPP (refer to Chapter 2.0 of this document), conditions relevant to JPP as stated in the MOA, the ROD for the WWB Replacement Project (refer to the Appendix), or the security measures recommended by the federal TSA. In this document, the No-Action Alternative is used as the baseline against which the action alternatives are compared for purposes of assessing potential environmental and community impacts.

The four action alternatives were developed to address security recommendations, minimize the potential effects of improvements to JPP, and to meet design goals in the MOA, ROD, and of the JPP Development Group comprised of the NPS, FHWA, City of Alexandria, and other stakeholders.

A. The No-Action Alternative

The No-Action Alternative maintains the two existing soccer fields located south of the WWB; therefore, no additional environmental, social, or construction impacts would be expected due to

new park improvements. However, the No-Action Alternative does not address the need for improvements in JPP based on:

- The lack of a current comprehensive management plan for JPP.
- Required mitigation commitments for impacts from the WWB Replacement Project (protection of JPP resources and provision of recreational opportunities).
- Required security measures in JPP due to recommendations contained within the Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project (June 2002).

The No-Action Alternative does not fulfill the purpose for the project which is to:

- Develop a long-range plan for JPP.
- Identify desired resource conditions and visitor experiences.
- Consider feasible alternatives for future development of JPP.
- Provide educational and recreational opportunities for visitors while protecting park resources.

The No-Action Alternative does not comply with the NPS 1984 Development Concept Plan that outlined specific park improvements for expanded use and enjoyment of the park (refer to Chapter 2.0 of this document). The Development Concept Plan indicated that park improvements would be directed toward fulfilling the following overall goals:

- Provide expanded recreational opportunities for all citizens.
- Improve the quality of recreational opportunities for all citizens.
- Provide for the safety and security of all park visitors.
- Provide an opportunity for understanding the natural and historic environment of the park.

On February 9, 1999, the Alexandria City Council adopted Resolution No. 1908 that stipulates, in part, that the redevelopment of JPP would be in accordance with specific design programs developed by staff of the City of Alexandria Department of Planning and Zoning. The City Council referred to design programs such as Design Guidelines for Jones Point Park and the Urban Deck (City of Alexandria, December 1998) and Historic Context and Recreation Issues for Jones Point Park, the George Washington Memorial Parkway and Urban Deck (City of Alexandria, January 1999) that recommended replacing the two soccer fields, though not necessarily in the present location, as the bridge expands to the south. To ensure that all improvements are aesthetically and ecologically compatible with the natural, historic and recreational resources of the park, extensive coordination has occurred between the NPS, the City of Alexandria, and the FHWA to further develop the mitigation and enhancement plan for JPP. The JPP Development Group comprised of the NPS, City of Alexandria, and other stakeholders recommended a number of key design and programmatic goals and objectives for JPP regarding cultural and natural areas, security, recreation, and circulation in the park (refer to

Chapter 2.0 of this EA). The No-Action Alternative does not address the Resolution adopted by the Alexandria City Council or the park program and design elements recommended by the JPP Development Group.

The MOA contained mitigation measures that lessen the potential adverse effects on cultural, historic and archeological resources due to the WWB Replacement Project. The No-Action Alternative does not fulfill the conditions in the MOA which specifically stated that "in consultation with the NPS, the Virginia SHPO, and the City of Alexandria, the FHWA shall provide improvements within Jones Point Park to aid in the recognition of the historic past of the park and implement measures to preserve historic resources within the park." These measures include appropriate improvements that convey the historic past of JPP, interpretations of historic activities/sites, stabilization, preservation and interpretation of the VSC shipways, restoration of the lighthouse and grounds, and other conditions (refer to the MOA in the Appendix).

The No-Action Alternative does not meet the following design goals contained in the ROD which identified enhancements to JPP to mitigate impacts from the WWB Replacement Project. In particular, the No-Action Alternative does not:

- Realign and improve the entrance drive to the park.
- Reconfigure the parking area.
- Include park improvements such as shoreline stabilization, historic preservation/interpretation, paved and unpaved trails, and other amenities.

Finally, the No-Action Alternative does not address TSA's security recommendation to remove all parking from beneath the new WWB.

For the reasons stated above, the No-Action Alternative is not being carried forward for improvements to JPP but is used as a baseline against which the following action alternatives are compared for purposes of assessing environmental and community impacts.

B. Items Common to All Action Alternatives

All action alternatives have the following items in common (only with these common actions are the alternatives complete):

- Vehicle access to the park would occur from Royal Street, which will end in a turn-around. All alternatives include an access road that connects to the proposed parking areas in JPP (the access road length varies with each action alternative). All public vehicle access and parking areas under the existing WWB would be removed and the area beneath the new WWB is proposed to be treated with a paved or some other type of impervious surface.
- Parking areas and access to recreational facilities (including fishing areas and the Mt. Vernon Trail) will be evaluated, during final design, for compliance with the Americans with Disabilities Act (ADA) and adherence to current ADA regulations.

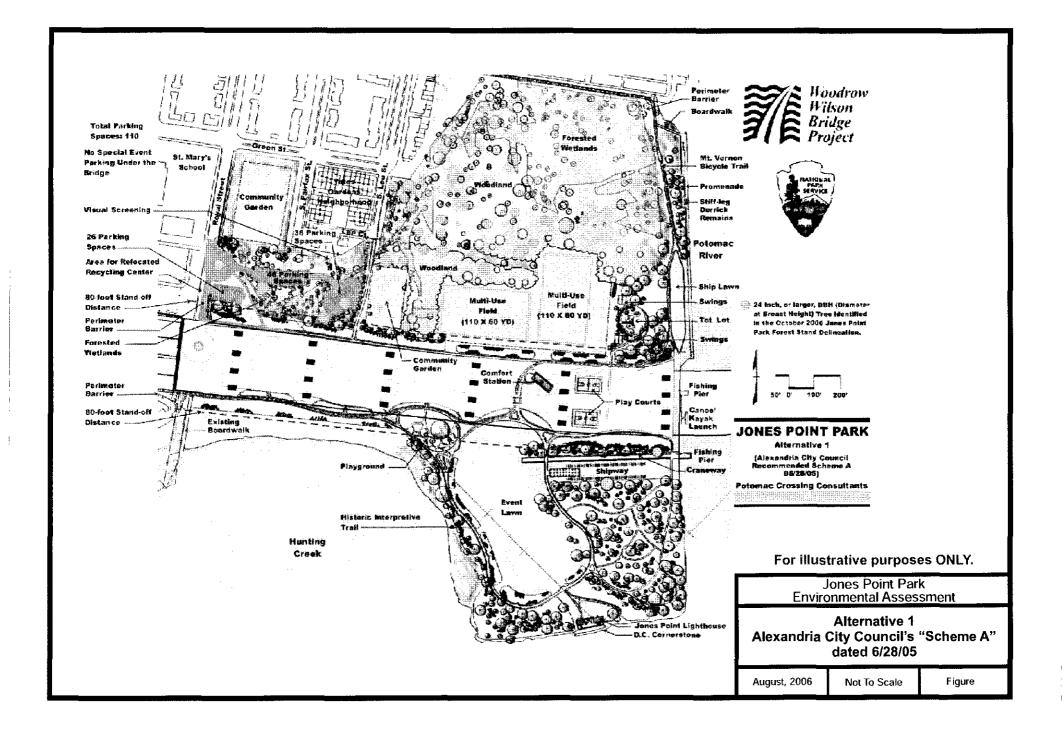
- A guardhouse would be located in the vicinity of Royal Street to ensure that, during special events, vehicles can be monitored entering and exiting within the 80-foot distance surrounding the new WWB.
- Based on the current security measures implemented at other NPS properties, each action alternative could use a combination of elements for the perimeter barriers including decorative fencing, a "ha-ha" wall (depressed wall with slope), masonry piers, bollards (stationery and retractable), and landscape plantings.
- A perimeter barrier would be required south of the WWB, adjacent to the Hunting Towers parking lot circulation road. This perimeter barrier would be constructed outside of the parking lot circulation road and parallel to the 80-foot distance measured from the north and south parapet driplines of the new WWB. The perimeter barrier would then terminate at the existing boardwalk on the south side of the bridge.
- Proposed shoreline stabilization, bulkhead, tot lot, park manager's office/comfort station, canoe/kayak launch, fishing pier, promenade/boardwalk, access road, and drainage improvements.
- Under all action alternatives, the current finishing pier would be changed to a promenade/boardwalk. Although the potential conversion of the finishing pier to a promenade/boardwalk would not prevent its use for fishing activities, two fishing piers would be provided within 200 feet of the existing fishing area, along the southeastern edge of the park. Access to fishing opportunities would be improved as the pedestrian paths and fishing piers would be designed to comply with current ADA regulations.
- Proposed drainage improvements consist of upgrading existing culverts and a new culvert installed between the existing culverts, under the proposed access road. All of the action alternatives would increase the stormwater runoff in the park as the drainage area to the culverts would be increased in size and contain more impervious area. However, the drainage improvements would expand the capacity of the storm drainage system to handle stormwater runoff and reduce the potential flooding of roads. The multi-use field would be considered for appropriate drainage enhancements.
- Access to the recycling center would be maintained and relocated to the new end of Royal Street.
- The Mt. Vernon Trail will remain a paved surface and connect to the new end of Royal Street. All other trails at this site would be paved or gravel pathways.
- In accordance with the MOA, the Jones Point Lighthouse would undergo rehabilitation of its exterior façade, including replacement of missing exterior features, repair of the exposed structural system within its interior, and the correction of earlier projects that were previously undertaken without adherence to appropriate historic preservation standards. All work would be performed with care to minimize potential impacts to archeological resources.
- The D.C. South Cornerstone would be stabilized in accordance with the MOA. The concrete vault enclosure surrounding the cornerstone would be redesigned and replaced to keep water out of the vault and to protect the cornerstone while improving its visibility from the lighthouse yard above. Also, the retaining wall surrounding the

cornerstone and lighthouse yard would be stabilized and rebuilt so that the wall and its historic appearance are restored and the lighthouse and cornerstone are provided improved long-term protection from invasive water action. Limited elements of the historic beach would be rebuilt to improve interpretation of the entire site. Efforts will be made to re-establish native wetland communities within the inner zone between the rocky bulkhead and the historic stone retaining wall. All work would be perfomed with care to minimize potential impacts to archeological resources.

- The Jones Point Lighthouse and D.C. South Cornerstone areas would be made physically accessible in accordance with the Architectural Barriers Act of 1968, the Americans with Disabilities Act of 1990, and the MOA.
- The area south of the WWB would be upgraded for use in cultural resource education and preservation, to facilitate management and protection of cultural resources as well as interpretation of local archeology and history to the public.
- The VSC Site would be enhanced and interpreted in accordance with the MOA and a January 2001 WWB Replacement Project treatment plan. Specifically, certain remaining elements of the VSC Site one of the shipways and the finishing pier are being retained and interpreted for the public as part of the overall park interpretation plan.
- Ground disturbance in known archeological sites would be avoided in accordance with the MOA and the September 2002 JPP Archaeological Preservation Plan.
- Efforts would be made to protect existing forested areas, especially large trees.
 Maintaining a tree canopy is important particularly for the Forest Interior Dwelling
 Species (FIDS) that were identified in the Final Supplemental Jones Point Park
 Consolidated Natural Resources Inventory (2000), which was completed as part of the
 WWB FSEIS.
- On-site wetland mitigation and tree loss replacement would be provided. Tree loss would be mitigated through additional plantings of native species. Wetland mitigation would occur at a 1:1 replacement rate.
- Jones Point Park Drive was closed in May 2006 after the opening of the WWB Outer Loop. Demolition of the existing bridge will require that access to Jones Point Park Drive only be available to the contractor and emergency equipment and personnel. Access to the southern part of the park would remain open to the public at all times.

C. Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)

Alternative 1 features access from Royal Street with two entry points leading to three parking areas. A total of 110 parking spaces would be located in the park between Royal Street and Lee Street, north of the new WWB. No additional parking would be provided under the WWB (which would require additional on-site security personnel provided by the City of Alexandria). The City of Alexandria developed this design concept as their preferred alternative (see Figure 5).



Visitors would enter JPP from Royal Street, via an access road located approximately 85 feet north of the 80-foot distance surrounding the WWB. A short entry drive, located approximately 50 feet south of the turnaround, would lead to a 26-space parking area. Another entry drive, located east of the turnaround, would lead to a second parking area. One parking area would accommodate 46 parking spaces and be located along the access road, approximately 90 feet south of the Royal Street community garden. The access road would continue further for approximately 120 feet to a 38-space parking area, located east of the existing wetlands and west of the Lee Street pathway. Visual screening is proposed to be located at the limit-of-disturbance just south of the Royal Street community garden and the Yates Gardens neighborhood.

A perimeter barrier system consisting of masonry walls and piers, bollards, a guardhouse, and landscape plantings would provide the required security from Royal Street at the 80-foot distance from the WWB. Together, the structural elements and landscape plantings would create an aesthetically pleasing entrance to JPP while providing the required security measures. The perimeter barrier system would parallel the 26-space parking area, the 38-space parking area, and continue north and across the Lee Street pathway. The perimeter barrier would continue east and end at a secure point in the forest.

The existing soccer fields located south of the existing WWB would be replaced with multi-use fields on the north side of the bridge. One multi-use field would be located parallel to the WWB and a second multi-use field would be placed perpendicular to the WWB, east of the first multi-use field. The westernmost multi-use field would be oriented in an east-west direction while the adjacent multi-use field would be oriented in a north-south direction. A tot lot would be sited east of the easternmost multi-use field. The tot lot would be landscaped with additional trees and plantings located between the easternmost multi-use field and the Mt. Vernon Trail.

The project includes a pedestrian pathway connecting the Mt. Vernon Trail to Royal Street. A perimeter barrier system would be added in the vicinity of the Mt. Vernon Trail. Trail users would be able to pass through the perimeter barrier system at the northeast portion of JPP. Two play courts would be located under the WWB between the park manager's office/comfort station and the proposed canoe/kayak launch. An event lawn would replace the current soccer fields south of the new bridge. This alternative contains the other items common to all action alternatives.

D. Alternative 2 (VDOT "Access Option 5" dated 9/28/04))

Alternative 2 features access from Royal Street and an access road that extends to the Potomac River and terminates at a parking area just west of the Mt. Vernon Trail. A 38-space parking area would be built on the west side of the westernmost multi-use field and a 72-space parking area would be built on the east end of the easternmost field (see Figure 6).

Visitors would enter JPP from Royal Street via an access road located approximately 200 feet north of the WWB. A perimeter barrier system potentially consisting of masonry walls and piers, bollards, a guardhouse, and landscape plantings would be located just south of the turnaround. These elements would provide an aesthetic gateway to JPP, welcoming users while providing the required security measures. A perimeter barrier system, with landscape plantings,

is proposed to be located just south of Fairfax Street and run parallel to the new access road from Royal Street to approximately 100 feet west of the Lee Street pathway. Deciduous and evergreen trees would be planted between the perimeter barrier and access road to provide visual screening.

The access road would lead motorists to two parking areas. The road would run parallel to the south side of the Royal Street community garden, gently curve to a point east of the Lee Street pathway and run parallel to the WWB at an offset of 80 feet, ending west of the Potomac River. An approximate 50-foot-wide swath would be cleared from Royal Street to the Lee Street pathway to accommodate the new access road; however, a forested buffer located between the Yates Gardens neighborhood and the JPP access road would remain.

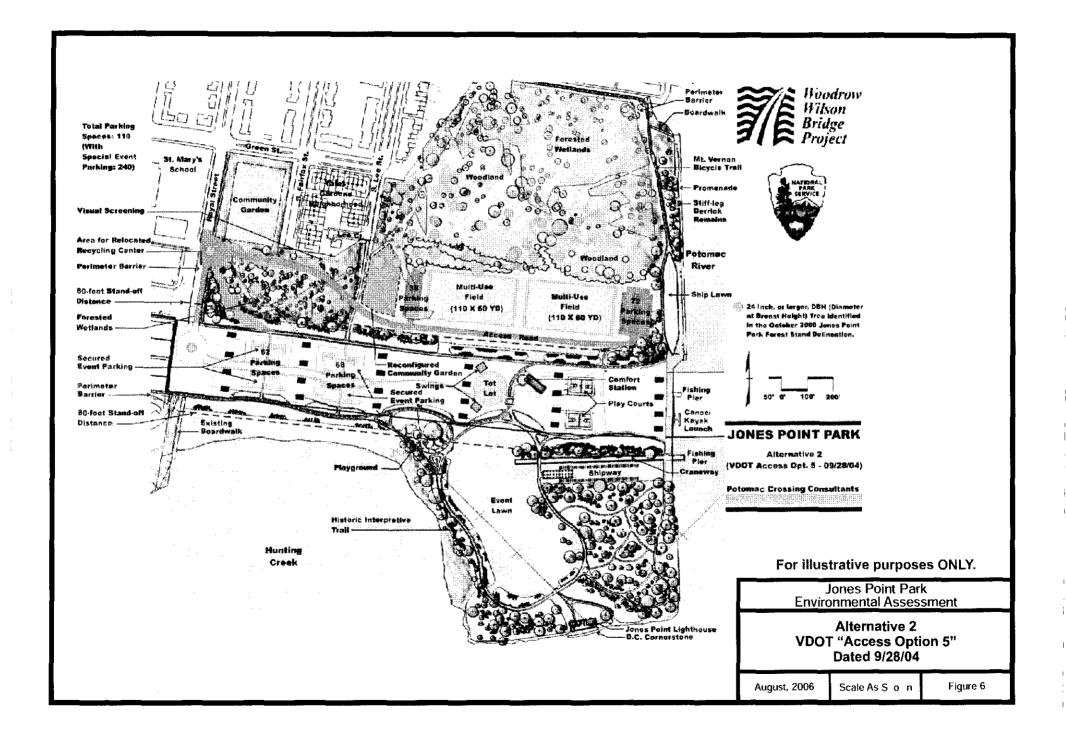
The access road would require extending the Lee Street community garden north to keep it the same size as the original garden A 38-space parking area would be located approximately 160 feet east of the Lee Street pathway, north of the access road and perpendicular to the WWB. The park access road would end at a 72-space parking area located east of the easternmost multipurpose field. The combination of the two parking areas and two multi-use fields would create a uniform southern edge to the forested area.

The existing soccer fields would be relocated north of the WWB. Two multi-use fields, located east of the parking area, would be oriented east-west, parallel to the WWB. The westernmost field would require clearing a partially forested area, while the easternmost field would be located in an existing open area.

A turnaround and 130 additional parking spaces would be located under the WWB to supplement public vehicle access and parking during special events (a total 240 parking spaces available for regular and special events). The 130 parking spaces under the WWB would only be accessible during special events and would require additional on-site security personnel provided by the City of Alexandria.

A perimeter barrier system would follow a pedestrian path to the 80-foot distance surrounding the WWB. The perimeter barrier system, with landscape plantings, would continue at the 80-foot distance from the new bridge, just southeast of the 72-space parking area.

The project includes a pedestrian pathway connecting the Mt. Vernon Trail to Royal Street. A perimeter barrier system, potentially comprised of a series of boulders and bollards, is proposed to cross the Mt. Vernon Trail to the Potomac River. Trail users would have to pass through a perimeter barrier system potentially comprised of masonry walls, piers, and bollards that would provide an aesthetically pleasing gateway to JPP. A tot lot would be located under the bridge, west of the park manager's office/comfort station. Two play courts would also be placed under the WWB between the park manager's office/comfort station and the promenade/boardwalk. An event lawn would replace the current soccer fields south of the new bridge. This alternative contains the other items common to all action alternatives.



E. Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)

Alternative 3 features access from Royal Street by a roadway extending east of Lee Street. The access road would run south of the Royal Street community garden and shift south, ending west of the multi-use field. The access road would connect to a 50-space parking area south of the road and the 60-space parking area, located approximately 30 feet west of the multi-use field. The alignment for the access road would remain outside the 80-foot distance surrounding the WWB (see Figure 7).

Visitors would enter JPP at the end of Royal Street, leading to a turnaround located approximately 220 feet north of the WWB. From the turnaround, motorists would turn left to an access road and proceed to one of two parking areas. The entrance to the 50-space parking area would be located approximately 100 feet west of the eastern edge of the Royal Street community garden. Vehicles would exit the parking area approximately 100 feet east of Fairfax Street. The parking area would be located south of the access road with two points of ingress and one point of egress. A perimeter barrier comprised of landscape plantings is proposed to be located just south of Fairfax Street and run parallel to the new access road from Royal Street to west of the Lee Street pathway. An approximately 50-foot-wide swath would be cleared from Royal Street to the Lee Street pathway to accommodate the new access road; however, a forested buffer between the Yates Gardens neighborhood and the JPP access road would remain. Deciduous and evergreen trees are proposed be planted between the perimeter barrier and access road to provide visual screening.

The access road would wind through a forested area, cross the existing roadway extending from Lee Street, follow the southern edge of the Lee Street community garden, and end at a 60-space parking area just west of the proposed multi-use field north of the bridge. A perimeter barrier system would parallel the southern and eastern edge of the new parking area. The access road would require extending the Lee Street community garden north to keep it the same size as the original garden.

A single 110 x 60 yard multi-use field would be located east of the proposed 60-space parking area, located north of and oriented parallel to the WWB. A tot lot would be sited east of this multi-use field, north of the WWB. The tot lot would be landscaped with additional trees and plantings between the northern multi-use field and the Mt. Vernon Trail.

A reconfigured soccer field would remain in its existing location south of the WWB. This multiuse field, proposed to be 80 x 40 yards, would be oriented diagonally in a northwest/southeast direction.

A turnaround and 130 additional parking spaces would be located under the WWB to supplement public vehicle access and parking during special events (a total 240 parking spaces available for regular and special events). The 130 parking spaces under the WWB would only be accessible during special events and would require additional on-site security personnel provided by the City of Alexandria.

A perimeter barrier system potentially consisting of masonry piers and walls, bollards, landscape plantings, and a guardhouse would circle the southern edge of the turnaround at Royal Street.

This perimeter barrier system would provide an aesthetically pleasing gateway to both JPP and the Mt. Vernon Trail. A masonry wall, at an offset of approximately 10 feet, is proposed to follow a pedestrian path to the 80-foot distance surrounding the WWB. Landscape plantings, incorporating a cable fence, are proposed to secure the stand-off distance, approximately 70 feet from the edge of the Mt. Vernon Trail. The landscape plantings would transition to bollards and piers at the intersections of the Lee Street pathway. East of the path, a perimeter barrier system of masonry piers and walls is proposed to transition to bollards, offset approximately 5 feet from the access road. A perimeter barrier system would surround the 60-space parking area.

The project includes a pedestrian pathway connecting the Mt. Vernon Trail to Royal Street. Users of the Mt. Vernon Trail would have to pass through a perimeter barrier system. This perimeter barrier system would resemble a gateway, potentially comprised of masonry walls, piers and bollards. This alternative contains the other items common to all action alternatives.

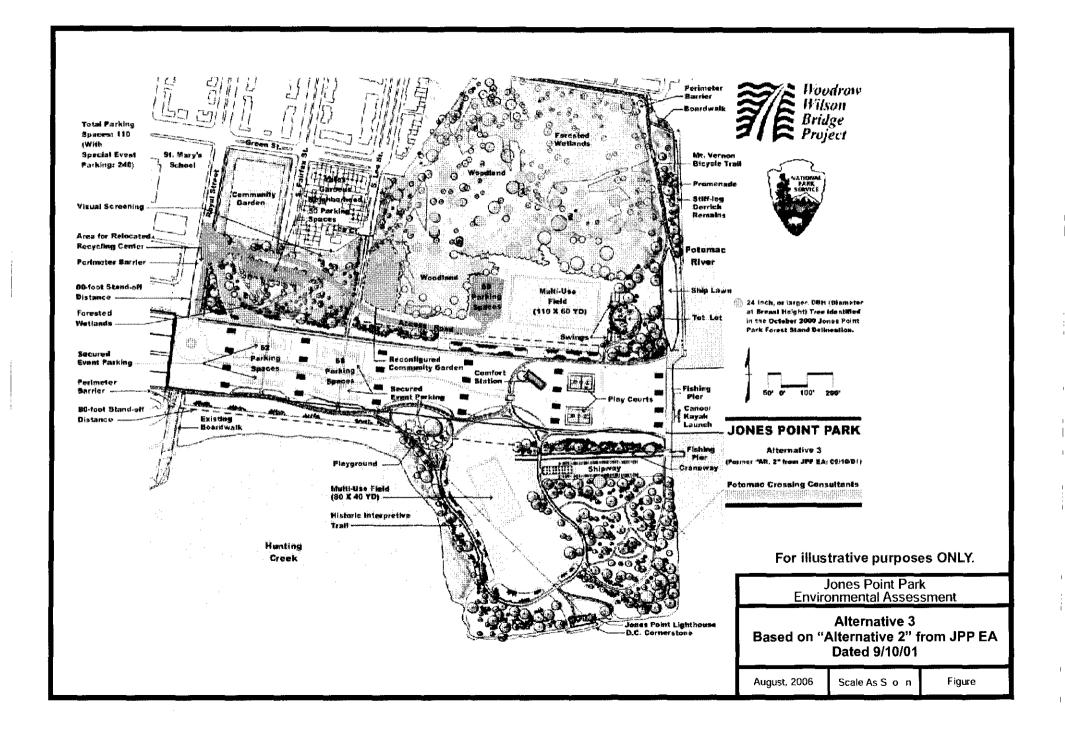
F. Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)

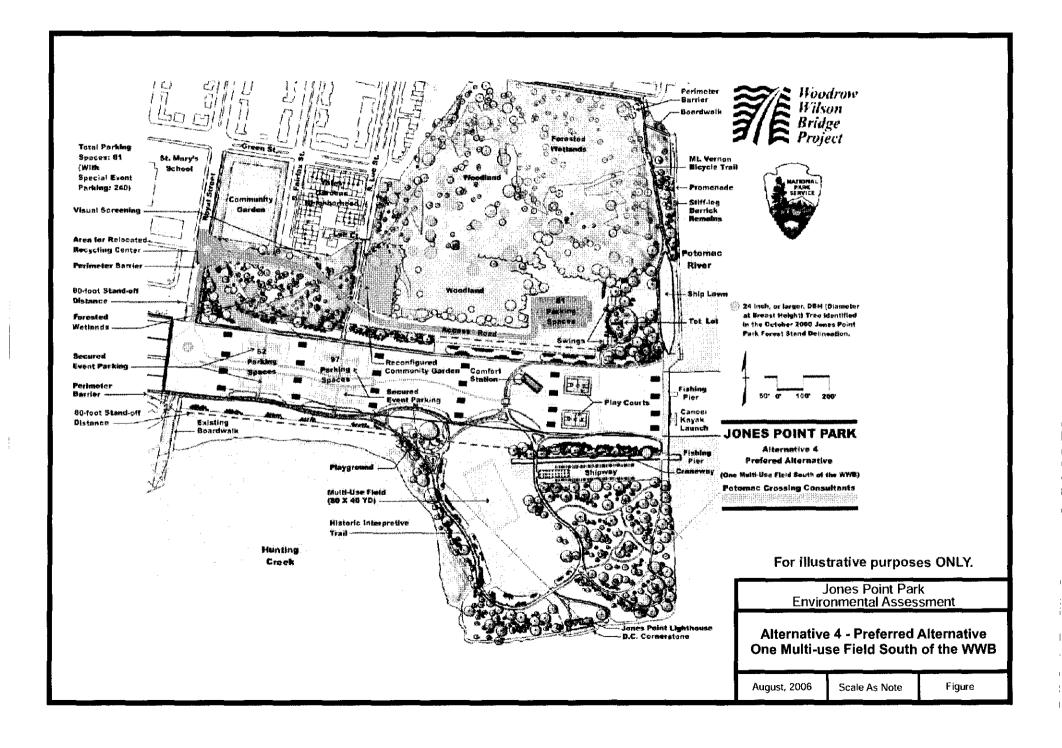
Alternative 4 features access from Royal Street via an access road extending to an 81-space parking area located just west of the Potomac River. The 81-space parking area would use the same footprint as the existing interim parking area with the access road connecting from a new turnaround at Royal Street. A multi-use field would be located south of the bridge in a similar location as the existing field (see Figure 8).

Visitors would enter JPP via Royal Street leading to a turnaround located approximately 220 feet north of the WWB. A perimeter barrier system potentially consisting of masonry walls and piers, bollards, a guardhouse, and landscape plantings would be located just south of the turnaround. These elements would provide an aesthetic gateway to JPP, welcoming users while providing the required security measures. A perimeter barrier system, potentially comprised of landscape plantings, would be located just south of Fairfax Street and run parallel to the new access road from Royal Street to approximately 100 feet west of the Lee Street pathway. Deciduous and evergreen trees would be planted between the perimeter barrier and access road to provide visual screening.

From the turnaround, motorists would be able to reach the 81-space parking area via the access road. The road would run parallel to Royal Street community garden, gently curve to a point east of the Lee Street pathway and run parallel to the WWB at the 80-foot distance, ending west of the Potomac River. An approximate 50-foot-wide swath would be cleared from Royal Street to the Lee Street pathway to accommodate the new access road; however, a forested buffer between the Yates Gardens neighborhood and the JPP access road would remain. The access road would require extending the Lee Street community garden north to keep it the same size as the original garden.

A reconfigured soccer field would remain in its existing location south of the WWB. One multiuse field, located in a similar location as the current field, would be oriented in a northwest/southeast direction. The field would be 80 x 40 yards.





A turnaround and 159 additional parking spaces would be located under the WWB to supplement public vehicle access and parking during special events (a total 240 parking spaces available for regular and special events). The 159 parking spaces under the WWB would only be accessible during special events and would require additional on-site security personnel provided by the City of Alexandria.

South of the turnaround, a perimeter barrier system would follow a pedestrian path to the 80-foot distance surrounding the WWB. Landscape plantings are proposed to continue approximately 70 feet west of the Lee Street pathway, parallel to and at the required 80-foot distance of the new bridge. The landscape plantings would potentially transition to bollards and masonry walls and piers at the intersection of the Lee Street pathway. East of the pathway, bollards are proposed to be located parallel to the access road until just south of the parking area. Landscape plantings, incorporating a cable fence, would continue to the Mt. Vernon Trail. The landscape plantings would be briefly interrupted by a masonry wall and pier gateway with bollards, at the crossing of the pedestrian path at the tot lot. Potential bollards and masonry piers would continue across the proposed promenade/boardwalk to the Potomac River.

The project includes a connection of the Mt. Vernon Trail to Royal Street via a pedestrian pathway. Users of the Mt. Vernon Trail would have to pass through a perimeter barrier system. This perimeter barrier system would resemble a gateway, potentially comprised of masonry walls, piers and bollards. This alternative contains the other items common to all action alternatives.

4.0 AFFECTED ENVIRONMENT

A. Social and Built Environments

General and Environmental Justice Populations

U.S. Census data (2000) indicate that the City of Alexandria contained 128,283 persons, of which approximately 9% were age 65 years and over, 40% were minority, 15% were of Hispanic or Latino origin, and 9% low-income. There are no environmental justice (minority or low income) populations living within JPP's project area. Although no formal study has been conducted, the NPS has observed that many users of the existing finishing piers for fishing activities include minority populations (primarily African American and Hispanic) of varied ages. By observation, retirement-aged visitors tend to use the piers for fishing during the midday while visitors of all ages utilize the piers during other periods.

http://quickfacts.census.gov/qfd/states/51/51510lk.html

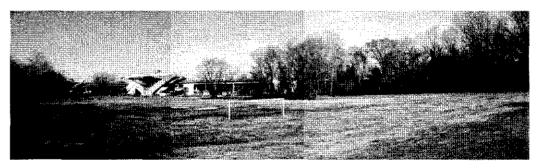
² Minority is defined as "individual(s) who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic."

Neighborhoods, Community Facilities, and Services

The park includes two community gardens, a recycling center, and is in close proximity to the (private) St. Mary's Elementary School, located west of Royal Street, and the Yates Gardens neighborhood, located between Fairfax Street and Lee Street. The Yates Gardens neighborhood contains single-family homes and townhouses. The existing access road to JPP is located approximately 300 feet from the closest residence in the Yates Gardens neighborhood. A recycling center is located just north of the WWB (previously located south of the bridge, but relocated during bridge construction). Approximately 80 parking spaces were located under the WWB prior to construction of the new bridge. Since construction on the new WWB, JPP visitors have been using an interim parking area located in the eastern portion of JPP.

Visitor Use and Experience

Prior to the WWB construction, JPP contained passive and active open space, forested areas, recreation trails, and parking areas. The park has forested areas, two large soccer fields, picnic areas with picnic tables, walking and biking trails, two community gardens, fishing areas, and an area previously used as a large ship dock north of the WWB along the Potomac River. Access to the Potomac River for fishing and other water recreational activities currently exists approximately 340 feet from the interim parking area located north of the WWB. The typical visitor experience includes travel to the historical, natural and recreational areas, by either automobile on the roadway or by foot or bicycle on the linear trail network. JPP also hosts city festivals and events.



Soccer fields located south of the WWB

The WWB physically and visually bisects the park and contributes most of the existing noise in the park. The NPS currently owns JPP under the jurisdiction of the George Washington Memorial Parkway.

Visual and Aesthetic Conditions

The WWB is the most prominent element in the visual landscape when entering the park via Royal Street (the Royal Street community garden is hidden from view by vegetation). Royal Street currently ends at Jones Point Park Drive, flanked by a recycling center and dense woodlands to the north and the large WWB structure to the south. Parking is provided in an open area north of the park access road, which then dead-ends at the Potomac River. Most views

of the Potomac River from the park access road are obstructed by either heavy vegetation or the WWB structure. Fields and woodlands south of the bridge are visible under and through the bridge structure.



Looking south at existing bridge from Royal Street



Looking west through Royal Street Community Garden from S. Fairfax St.

The Yates Gardens neighborhood borders the northern edge of JPP. Dense woodlands along the park's northern perimeter prohibit nearly all views between the park and neighboring communities. A pedestrian path at the end of Lee Street provides a second access point to the park. Woodlands to the west and the Lee Street community garden to the east border this wide path. Planted rows of trees run parallel to both sides of the trail. While views of the natural environment border the trail, the WWB dominates the southern view.

The Mt. Vernon Trail, located at the eastern edge of JPP, provides views of the Potomac River before continuing northward to dense woodlands. Views of the river, various birds and animals, and Maryland's coastline can be seen from this vantage point. Panoramic views of the WWB can be seen looking south.



Lee Street Community Garden



Royal Street Community Garden in Winter

The Potomac River borders JPP on the east and Hunting Creek is on the south. Dominating the northern view, the WWB visually separates the southern section of the park from the northern section. Natural wetlands, the Potomac River, Hunting Creek, birds and wildlife, the Jones Point Lighthouse, and the D.C. South Cornerstone can all be viewed from pathways along the water's

edge. A fishing pier, located on the extension of one of the historic shipways at the park's southeast corner, provides unique views of the Potomac River and the WWB. Rosalie Island, on Maryland's coastline, and the Hunting Towers in the west can also be seen from JPP. Dense woodlands surround the open playing-field area and foundations of past shipbuilding activities can be seen in the forest understory.

B. Natural Resources

Soils.

The Alexandria County Soil Science Office, Fairfax County Soil Science Office and USDA Natural Resources Conservation Service (formerly USDA Soil Conservation Service) have mapped soils within the project study area (1915 and 1963). The predominant soil is dredged fill from the Potomac River, deposited circa 1910, and consisting mostly of poorly-drained silt loam. Residual soils are mapped as Huntington loam (Hl), a friable, well-drained loam.

Wetlands and Waters of the U.S.

Wetlands exist within JPP primarily north of the bridge and along Hunting Creek south of the bridge. On the north side, wetlands exist in shallow depressions or gently sloping drainage swales. These systems are primarily forested with broad-leaved deciduous vegetation including *Platanus occidentalis* (sycamore), *Acer negundo* (box elder), *Acer rubrum* (red maple), *Cornus amomum* (silky dogwood), and *Toxicodendron tulipifera* (poison ivy). Underlying soil samples were mostly silt loam in texture and had hydric indicators including low chroma colors and redoximorphic features. Hydrologic indicators included inundation, water marks on trees, drift lines, sediment deposits, and drainage patterns. Functions and values provided by the non-tidal forested wetlands within the park were assessed through best professional judgment. Principal functions include nutrient removal and transformation, and wildlife habitat. The principal value is aesthetics.

One tidal freshwater emergent wetland occurs north of the bridge along the Potomac River. This wetland is comprised of *Sagittaria latifolia* (arrowhead) and *Saururus cernuus* (lizard's tail) vegetation and is underlain by gleyed soils. Hydrologic indicators included inundation, saturation, water marks, drift lines, sediment deposits, water-stained leaves, and drainage patterns. Principal functions were identified through best professional judgment and include sediment/toxicant retention, nutrient removal and transformation, and finfish habitat.

On the south side, wetlands are primarily tidally influenced and occur adjacent to Hunting Creek and along the Potomac River. Additionally, isolated wetland depressions occur in the interior of the park site just south of the bridge. Tidal wetlands include large areas of emergent marsh comprised of *Pontederia cordata* (pickerelweed), *Polygonum arifolium* (halberd-leaf tearthumb), *Typha* sp. (cattail), *Hibiscus moscheutos* (rosemallow), and *Polygonum sagittatum* (arrow-leaf tearthumb). Tidally influenced forested wetlands also occur along the shoreline of Hunting Creek. Dominant vegetation within this wetland includes *Ulmus americana* (American elm), *Acer saccharinum* (silver maple), and red maple.





Wetlands Wetlands

Soil samples had low chroma matrix colors and exhibited a silt loam texture. Hydrologic indicators included drift lines, sediment deposits, and water marks. Wetland functions and values provided by the tidal wetlands along Hunting Creek include floodflow alteration, sediment/toxicant retention, nutrient removal and transformation, wildlife habitat, and aesthetics. Isolated depressional non-tidal wetlands are dominated by forested vegetation including silver maple, box elder, sycamore, *Fraxinus pennsylvanica* (green ash), red maple, silky dogwood, poison ivy, and *Lonicera japonica* (Japanese honeysuckle). Soils were clayey in texture and appeared to hold surface runoff for sufficient time to create wetland conditions. Wetland functions and values provided by the isolated forested wetlands are limited to minor wildlife habitat and aesthetics.

Non-wetland waterways also occur within and adjacent to the park, including the tidal portions of the Potomac River and Hunting Creek. Other non-wetland drainage swales are located north of the bridge adjacent to the Potomac River and between Lee Street and Royal Street. Submerged aquatic vegetation (SAV) also occurs along the eastern and southern shoreline of JPP within the Potomac River. Common SAV species include *Hydrilla verticillata* (hydrilla), *Ceratophyllum demersum* (coontail), *Myriophyllum spicatum* (Eurasian watermilfoil), *Vallisneria americana* (wild celery), and *Heteranthera dubia* (water stargrass).

All wetlands and Waters of the U.S. within JPP originally were delineated in January and February 1999 and received a jurisdictional determination from the USCOE later that year. A redelineation of a portion of the forested nontidal wetlands just east of the Lee Street community gardens was conducted in August of 2005 as part of a reevaluation of the wetlands and waters by the USCOE. The USCOE verified the expanded wetland boundaries and accepted the remainder of the wetlands and waterways within JPP as previously delineated in 1999.

Vegetation and Terrestrial Habitats

Terrestrial habitats within JPP include managed lawn, vine tangles, and forest. Managed lawn occurs on the southwest side of the park and comprises about 6 acres. It includes athletic fields surrounded by a natural park setting with scattered large trees. Areas overgrown with vines, primarily the exotic, invasive *Ampelopsis brevipedunculata* (porcelain berry), occur north of the

WWB and east of Lee Street in JPP. This area comprises approximately 5.5 acres. Scattered dead trees occur in this area, some of which have been overgrown and appear to have been killed by vines.

The remainder of the vegetated portion of the park (approximately 28 acres) is comprised of forest. This forest community consists of mixed mesophytic types of the eastern deciduous forest, normally characterized by an uneven-aged, second growth mixed hardwood community. Most of the forest habitat within JPP occurs on land that was dredged from the Potomac River in the early part of the twentieth century. This forest has been allowed to grow since the area was abandoned for shipbuilding and other uses during World War II. However, the forest that occurs along the western peninsula that represents the original Jones Point is older, and contains more diverse native flora.

Six forest stands were recognized at JPP, including three stands on the south of the bridge and three stands on the north side. Common canopy species within these forest stands includes silver maple, red maple, box elder, sycamore, green ash, *Populus deltoids* (cottonwood), *Morus alba* (white mulberry), *Salix nigra* (black willow), and American elm. Wetland forest occurs within most stands. Non-native and invasive plant species, including Japanese honeysuckle and *Hedera helix* (English ivy) vine and *Rosa multiflora* (multiflora rose) bush dominate much of the herbaceous and shrub layer of the forest stands in JPP. While JPP is comprised of uneven-aged, second growth trees, many of these trees have reached considerable size. A total of 144 trees with a diameter at breast height (dbh) of 24 inches or greater were identified within the park. A description of each forest stand is provided in a report entitled *Final Supplemental Jones Point Park Consolidated Natural Resources Inventory*, October 2000.

Wildlife

JPP is small and relatively isolated from other natural habitat areas along the Virginia shoreline. Consequently, wildlife use of the park is limited. Even so, the park provides habitat for typical suburban woodland wildlife species, particularly birds. A two-year breeding bird survey was conducted in June 1999 and 2000 to provide an inventory of breeding birds in the park. Birds observed in flight over the park or in the adjacent tidal fresh waterways were recorded during the bird surveys. Other wildlife was also recorded. The Appendix contains a list of birds and other wildlife observed in JPP.

Results of the study indicated that JPP is not valuable habitat for forest interior dwelling species (FIDS), species that require large tracts of undisturbed forest to sustain viable breeding populations, even though some FIDS were present within the park. The study did conclude that the forested habitat at JPP was suitable for various species of Neotropical migratory land birds (NML) that breed in the mid-Atlantic region then migrate south to Central and South America to spend the winter. A few of these species that were probable or confirmed breeders within the park include *Icterus galbula* (Baltimore oriole), *Dumetella carolinensis* (gray catbird), *Hylocichla mustelina* (wood thrush), and *Vireo gilvus* (warbling vireo). Resident land birds (RL) that reside within the park year round were also well represented. These species include many common suburban birds such as *Melanerpes carolinus* (red-bellied woodpecker), *Picoides pubescens* (downy woodpecker), *Cyanocitta cristatta* (blue jay), *Corvus brachyrhynchos*

(American crow), *Poecile carolinensis* (Carolina chickadee), *Baeolophus bicolor* (tufted titmouse), and *Cardinalis cardinalis* (northern cardinal). Details of the study are contained within the *Final Supplemental Jones Point Park Consolidated Natural Resources Inventory*, October 2000.

In addition to breeding species, JPP provides habitat for winter resident birds and transients that stop over for short periods during migration. Winter resident species expected to occur at JPP include: Zonotrichia albicollis (white-throated sparrow), Troglodytes troglodytes (winter wren), Dendroica coronata (yellow-rumped warbler), and Junco hyemalis (dark-eyed junco). Transient migratory species include cuckoos, flycatchers, vireos, warblers, Piranga olivacea (scarlet tanager), and Pheucticus ludovicianus (rose-breasted grosbeak). No amphibians and few reptiles were observed in the park. However, species typical of suburban environments include Bufo americana (American toad), Rana clamitans (green frog), Hyla crucifer (spring peeper), and Nerodia sipedon (northern water snake).

Species of Special Concern (Rare, Threatened, and Endangered Species)

Except for the occasional occurrence of transient species, no federal- or state-listed species of plant or wildlife is known to occur within JPP.

C. Cultural Resources

Section 106 of the NHPA, as amended (16 USC 470 et seq.), Director's Order 28, Cultural Resource Management Guideline (NPS, 1998), and the NPS Management Policies (2001) all require that consideration be given to the impacts of a proposed project on historic properties that are listed or eligible for listing in the National Register of Historic Places (NRHP). These policies and regulations require the NPS to consult with the SHPO regarding the potential effects to properties listed on or eligible for the NRHP. Cultural resources are defined for this document as including archeological resources and historic resources, the latter comprised of historic buildings, historic structures, collections of historic properties (historic districts), and objects. Each of these topics is discussed in further detail below. Figure 9 shows the locations of cultural resources within, and adjacent to, JPP.

Archeological Resources

In addition to the policies and regulations cited above, Director's Order 28A, Archeology (2004) further discusses NPS' approach and commitment to the investigation, documentation, preservation, interpretation, and protection of archeological resources located within park units. As a steward of America's heritage, NPS is charged with the preservation of the commemorative, educational, scientific, and traditional cultural values of archeological resources for the benefit and enjoyment of present and future generations. Archeological sites are irreplaceable resources, so it is important that management decisions and activities throughout the park system reflect a common commitment to the preservation of archeological resources as important elements of our national heritage.

A number of archeological investigations have been conducted within JPP since the mid-1960s and continuing into the 1980s. Much of this work was carried out within the southern half of the park and focused on areas slated for proposed development or increased park uses. Additional investigations were conducted throughout the park between 1999 and 2005 in association with the WWB Replacement Project.

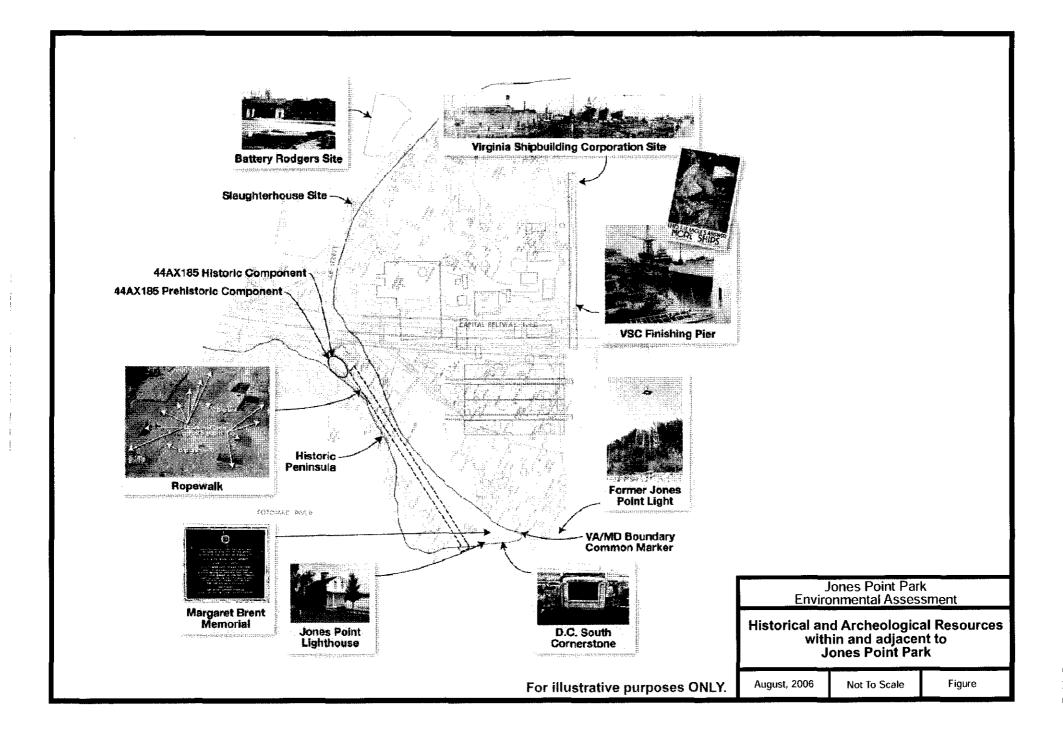
A total of five known archeological sites have been recorded within the project area. Three of these sites, the Jones Point Lighthouse Site (44AX52), the Jones Point Site (44AX53), and the VSC Site (44AX78) were identified prior to the WWB Replacement Project. Further investigation of JPP was conducted after the commencement of the project to determine the NHRP eligibility of these three sites and determine if any additional archeological sites were located within the park.

Geoarcheology was used to analyze soils for Phase I testing. The 2001 report, Interpretations of Borings in the Southern Blocks of Piers V6 and V7, Woodrow Bridge Replacement Project, Jones Point, Alexandria, Virginia, and 2002 reports, Geoarcheological Interpretations of Soils and Sediments Between the Northern Blocks of Piers D and F For the Woodrow Wilson Bridge Replacement in Alexandria, Virginia and Pedology, Geomorphology and Landscape Reconstruction at Jones Point Park in Alexandria, Virginia, identified no previously unknown archeological sites located within the footprint of the bridge.

The Jones Point Lighthouse Site (44AX52) encompasses a 30 x 100-foot area around the existing lighthouse structure. Although the site is primarily more of historic than prehistoric interest, the survey form indicates that a "possible quartzite projectile point" was collected from the site during a 1978 survey. Excavations in the yard area of the lighthouse in 2000 as part of the Historic Structures Report and Treatment Plan for the Jones Point Lighthouse and District of Columbia Cornerstone recovered a number of quartz and quartzite flakes, as well as four projectile points.

The JPP area has been subjected to previous archeological investigations beginning in the 1960s. Most of this work was conducted in the southern portion of the park by Lewis (1966) and Little and Ayres (no date). In 1982, the Jones Point Site (44AX53) was recorded when a collector turned in a number of artifacts from the eroding shoreline. In 1985, Leedecker and Friedlander completed an archeological survey for proposed improvements in the park. Additional prehistoric artifacts were recovered from an intact surface beneath 2.5 feet of fill deposits during the excavation of three backhoe trenches in the area of the soccer fields. The small artifact assemblage consisted of an assortment of quartz, quartzite and rhyolite flakes, a quartz projectile point and a ceramic sherd. Given the proximity to the Jones Point Site to the backhoe trenches, the recovered artifacts were included as part of the previously recorded site (44AX53) in the Historic Structures Report and Treatment Plan for the Jones Point Lighthouse and District of Columbia Cornerstone.

The VSC Site (44AX78) was identified and formally recorded during the 1984 archeological survey. Coal, ash and structural debris associated with the shipyard were encountered in all the areas that were tested for the proposed improvements. Although no important features were identified within the areas of potential construction impact, the report did note that a number of structural features and foundations had survived and were visible on the surface. Other than



noting their presence, no further investigation was conducted since they were not located within the area of potential affects. However, in 1999 an intensive investigation of the entire shipyard site was conducted as part of the WWB Replacement Project.

Phase II Investigations, discussed in the 2000 report *Phase II Archeological Testing and Determination of Eligibility Documentation for Submittal to the Keeper of the National Register of Historic Places, Virginia Shipbuilding Corporation Site (44AX78), Alexandria, Virginia, found that the site was not eligible for inclusion in the NRHP. Based on a 1921 Sanborn Insurance Map, the locations for 19 structures, four craneways, and four shipways were tested in order to determine if foundation and structures features remained intact. The results of the testing effort indicated that 10 structures have intact foundations, four consist of foundation sections, pier supports and machine mounts, while five did not have any foundation remains. All that was left of the four craneways were the rail supports, and only sections of the shipways were intact. In addition, no primary artifact deposits associated with the shipyard were found; although push piles of materials were present to the west of the shipways. On August 16, 2000, the Keeper of the National Register formally agreed that this site was not individually eligible for the NRHP, but was a contributing element to the NRHP-listed Alexandria National Register Historic District.*

In 1992, Site 44AX165 was identified during subsurface investigations within the lawn area adjacent to the then standing VSC Administration Building. An 1845 map depicted a ropewalk and two unidentified structures, one to the northeast and one to the southwest. The investigation did not encounter any definitive evidence for the ropewalk or the structure located to the northeast. However, stratigraphic data and cultural material recovered from test units excavated southwest of the postulated location of the ropewalk suggested the possible location of the other (or southwesterly situated) structure. This site was included in the Phase II report for the VSC Site (44AX78).

The final site recorded to date is the Hunting Creek Site (44AX185). The Hunting Creek Site was first identified in the course of the testing for the VSC Site. Backhoe trenches were excavated in the vicinity of the then extant Administration Building. An intact buried surface, identified as an early plowzone, was found beneath approximately 5 feet of fill. The buried plowzone contained variably dense quantities of primary and secondary debitage, as well as core and core fragments. The assemblage from these initial three-foot units included 873 flakes, along with several biface fragments and projectile points. Also recovered were historic materials that included domestic ceramics, brick, and other materials, most dating to the early to mid-19th century. In view of the density of lithic debitage and other tools associated with the buried plowzone, the site was considered potentially eligible for listing in the NRHP.

Phase II investigations, discussed in the 2000 report *Phase II Archeological Testing on the Prehistoric and Historic Components of Site 44AX185, Jones Point Park, Alexandria, Virginia*, were conducted in August and September 2000 to evaluate the site's potential to be listed in the NRHP. The report concluded, based on the recovery of additional lithic debitage, three small pit features, and a post mold, that the site was eligible for nomination to the NRHP under Criterion D. Data recovery excavations were recommended to mitigate adverse impacts to the site posed by the construction of the new WWB. Phase III investigations, discussed in the 2005 report,

Phase III Archeological Mitigation of the Prehistoric and Historic Components of Site 44AX185, Jones Point Park, Virginia, resulted in the definition of a small Late Woodland hamlet site marked by at least one small, oval-shaped (or elliptical) structure, several associated refuse pits, and other posts and small pits that may or may not be associated. In addition, historic remains included a significant section of the 19th century ropewalk that once existed on the point, as well as a cellar hole.

In 2005, additional Phase I testing was performed to the north of the bridge and along the Potomac River in areas designated for potential placement of parking and pathways as part of the EA process for the proposed JPP improvements. This report, titled *Geoarcheological Interpretation of Soils and Sediments Beneath an Area Proposed for Park Access and Parking for Jones Point Park in Alexandria, Virginia*, found no previously unknown archeological sites located within the planned parking or pathways.

Although not located within JPP, but relevant to studies associated with the WWB Replacement Project, archeological investigations were conducted within a 10.1 acre parcel adjacent to the northern border of the project area (Cheek and Glendening 1966, Artemel et al. 1988 and Engineering-Science, Inc. 1993). Background research indicated that the southern third of the study area was once part of Battery Cove, which had been filled by the USCOE, and that there was potential evidence for a late 18th century wharf, a marine railway, features associated with a shipyard, and buried derelict vessels. Phase II testing involved the excavation of a number of backhoe trenches to locate these resources and, if present, to assess their integrity. The trenches encountered sections of a marine railway, the bulkhead for the wharf, a ship building slip and several barge and boat fragments were located at the edge of the cove. The buried derelict vessels were encountered between 7.5 to 9 feet below the surface, while the cove bottom ranged in depth from 9 to 13 feet below the surface. The data recovery phase of the project focused on these resources by exposing larger areas for detailed recordation. Once recorded, the features were reburied since they would not be impacted by the proposed development (Engineering-Science 1993).

In addition to the five known archeological sites, historic documentary and cartographic research has indicated that several potential historic archeological sites may be within the high sensitivity archeological zone of JPP. These sites consist of a Revolutionary War era blockhouse and battery, a late 18th century log house and quarantine station, and an early 18th century tavern and house. Very little information exists about these potential sites other than they were situated on Jones Point. Although the exact location of these resources is unknown, the time periods during which they existed indicate that they would have been located within the original landmass of JPP (i.e., the high sensitivity archeological zone) prior to its expansion in 1910 to 1911. Extensive development during the 20th century, specifically the VSC, may have impacted the remains of these sites.

One site within JPP that may still have intact remains is the 1863 slaughterhouse. During the Civil War, Alexandria served as a hospital and supply center for the Union Army. All of Alexandria's railroads were consolidated and interconnected under federal control. The result was that thousands of federal soldiers milled about in town or manned fortifications around the city. To process meat, a government slaughterhouse was constructed in 1863. It was located at

the foot of Green Street, approximately 250 feet south of Battery Rodgers. The slaughterhouse consisted of a 20 x 56-foot wooden structure with horizontal siding with two 14 x 16-foot and 18 x 19-foot additions, which were built on a pier extending out over Battery Cove. Carcasses and offal dumped into the cove soon created an untenable situation. To mediate the problem, the USCOE drained the marsh at the head of the point and cleared and graded South Water Street (now Lee Street) through to Jones Point. Since subsequent development has not occurred at this location, there is a high potential that structural remains are still intact.

Finally, evidence of the remains of Battery Rodgers may be located to the northeast and adjacent to JPP at the intersections of Jefferson and Lee streets. Battery Rodgers was one of 68 forts which guarded Washington D.C. and Alexandria during the Civil War. The fortification was named for Navy Captain George W. Rodgers who was killed during the attack on Fort Wagner, Charleston Harbor, South Carolina on August 17, 1863. The fort, constructed in that same year, was strategically placed on a bluff approximately 28 feet above high water at the foot of Jefferson Street. Its location allowed it to fire on any vessels attempting to pass up the river. The section of the fort facing the river was 185 feet long, while the flanks were 60 (right) and 80 (left) feet long. The parapets were 25 feet thick with the two magazines protected by 17.5 feet of earth. The fort was designed for an armament of five 200-pounder Parrott guns and one 15-inch Rodman gun. Two large traverses that served as bombproof filling rooms protected the guns. In addition to the battery, other structures associated with the fort consisted of a mess hall and kitchen. Two barracks, a guardhouse and a prison (jail) were added in 1865. Although the battery was garrisoned after the war, it was finally abandoned and the buildings sold at public auction in 1869. Today, there are no visible remains of this historic site.

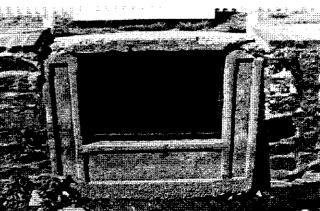
Prehistoric and Historic Resources

In Director's Order 28, Cultural Resource Management Guideline, NPS defines a historic structure as a resource constructed specifically for serving some kind of human activity. (Prehistoric resources are included under this definition, as well as under archeology, because the technical aspects of their preservation are similar to those of historic structures). Within JPP, the project area contains two historic resources, the Jones Point Lighthouse and D.C. South Cornerstone. These two resources are jointly identified as a single resource, known as the Jones Point Lighthouse and D.C. South Cornerstone (100-116), which was listed in the NRHP in May 1980 under Criterion A for its associations with the history of commerce, transportation in the City of Alexandria, as well as the planning and development of the District of Columbia.

The resource is located to the south of the WWB at the southern end of Jones Point on the Potomac River. The lighthouse, constructed between 1855 and 1866, is an early product of the U.S. Lighthouse Board. It is a rare surviving example of a "unified" form of lighthouse, with an integral keeper's dwelling and tower. It was an important component of the shipping trade in Alexandria, Virginia and Washington, D.C. from 1856 to 1926, when it ceased to be used as an active, inhabited aid to navigation. After it was deactivated, the property was abandoned. Fearing the effects of abandonment on the building, the Mt. Vernon Chapter of the Daughters of the American Revolution (DAR) worked with the U.S. Congress to formally transfer the lighthouse to the DAR which maintained the site until 1964, when it was subsequently transferred to the custody of the NPS. In 1986, the NPS and the DAR executed a cooperative

agreement that provides for the use of the Lighthouse by the DAR, and delineates management responsibilities for the preservation, repair, maintenance and interpretation of the Lighthouse.





Jones Point Lighthouse

D.C. South Cornerstone

Within the work yard of the lighthouse is located the Margaret Brent Memorial. Margaret Brent, known as a gracious and enterprising champion of women's rights, has been called the "first feminist of Colonial America." She was treasurer of the Colony of Maryland and the legal representative of Lord Baltimore. After a few years in Maryland, the Brent family moved to Virginia. On September 6, 1654, Margaret Brent received the first legal grant for a 700-acre tract of land which included the original 60-acre site of Alexandria. The 700-acre land grant was given in exchange for her payment of transportation from England to Virginia for fourteen yeoman servants, at the rate of 50 acres for each new settler brought over to Virginia. The land grant was re-issued in 1662 in the name of Charles II following his accession to the throne. The area was part of the present City of Alexandria. Margaret Brent died in 1671 on her estate in Virginia. In 1979, the Mt. Vernon Chapter of the DAR erected a memorial stone in her honor commemorating the first legal boundary designated in the area.

Adjacent to the lighthouse and located within a vault set into the sea wall adjacent to the Jones Point Lighthouse is the D.C. South Cornerstone. The cornerstone was placed at this site on April 15, 1791. The D.C. South Cornerstone is nationally significant for its association with the establishment of Washington, D.C. and with two nationally significant men: Andrew Ellicott, the surveyor who established the boundary lines, and Benjamin Banneker, his assistant, who was a highly accomplished free black astronomer and mathematician. The stone marks the beginning point, specified by George Washington in his instructions on the location of the federal district, for the survey of the boundaries of the District of Columbia. The stone is the first of 40 boundary markers used to delineate the original boundaries of the District of Columbia. The DAR constructed a concrete vault around the cornerstone in 1912.

A Multiple Property Documentation Form for the Boundary Markers of the District of Columbia was prepared and entered into the NRHP in 1990. The South Cornerstone was not specifically included within this nomination, as it had already been listed in the NRHP in 1980. However, the Multiple Property Documentation Form provides context for evaluating the significance of the stone. According to the Registration Requirements established in this nomination, the

criteria for a stone's eligibility for listing in the NRHP are that the stone "must be intact, its location known and marked, and if moved, preserved in a nearby location. If not the original marker, its replacement must be at least 50 years old." The D.C. South Cornerstone meets all of these criteria, as its location is known, and, if the existing stone is a replacement, the replacement dates to 1794 and it is, therefore, over 200 years old. Despite its poor condition, the D.C. South Cornerstone is clearly a monument of national significance as one of the earliest artifacts associated with the District of Columbia.

Another set of small historic foundations and an object are located within the park. The first is the Jones Point Light Tower Foundation, which consists of four concrete pads which once supported a 60-foot steel light tower to the east of Jones Point Lighthouse. Constructed in 1926, this tower was twice as high as the light on the older Jones Point Lighthouse, and could be seen for a distance of 13 miles. The light tower was dismantled in the late 1930s-early 1940s. The second object is the Virginia-Maryland Boundary Commission Monument. A now-eroded concrete pyramid topped with a bronze cap stamped "NO 58" and encircled with the words "Virginia-Maryland Boundary Commission" was placed in an area just north of the Jones Point Lighthouse in 1929. An arrow pointing east towards the river and the lettering "Distance 42 feet" indicates the high water mark boundary between the two states ending more than three centuries of dispute. U.S. Coast and Geodetic Survey data sheets state that the marker is azimuth 21 degrees 55 minutes 38 seconds and was recovered (surveyed and condition checked) in 1946 and 1957.

Outside the boundary of JPP to the north and west are located three historic districts. The first is the Alexandria National Historic Landmark Historic District. The second is the Alexandria National Register Historic District. The third is the locally-designated Alexandria Historic District. As specified under NHPA and NEPA, only the first two of these districts are considered under the scope of this EA. These are described in detail below.

Alexandria National Historic Landmark Historic District

A smaller Alexandria Historic District was designated a National Historic Landmark (NHL) in 1966 and listed in the NRHP on November 13, 1966. It encompasses an area of about 25 square blocks in the east-central part of the City, and is an irregular shape, bounded roughly by Union Street on the East, Queen Street on the north, Washington Street on the west, and Franklin Street on the south. The Alexandria Historic District (NHL) is significant under NRHP Criteria A and C, for contributions to the broad patterns of American history and for its outstanding early architecture. The Alexandria Historic District (NHL) contains one of the largest concentrations of 18th and early 19th century architecture in Virginia, and is particularly notable for its outstanding buildings in the federal period. The period of significance for the NHL district is 1732-1861. The NHL district comprises one of the finest early historic cityscapes in the United States. One individually listed NHL, Gatsby's Tavern, is within its boundaries. The generally high physical integrity of buildings within the district is attributable in part to a longstanding tradition of historic preservation in the community and the establishment of a local historic district ("Old and Historic Alexandria District") in 1946.

Alexandria National Register Historic District

A large area of the City of Alexandria, encompassing nearly 100 blocks of the oldest part of the town, has been identified by the Virginia Department of Historic Resources as Site No. 100-21. The historic district, referred to as the Alexandria Historic District, was determined eligible for listing in the NRHP in 1969. It was not, however, entered into the NRHP database until 1997.

The boundary of the Alexandria Historic District (NRHP), established in 1969, corresponded to the boundary of the local historic district ("Old and Historic Alexandria District") at that time, as described in the City of Alexandria's Ordinance 1338. The boundary has an irregular shape, and is generally defined by the Potomac River on the east, Second Street on the north, Payne Street on the west, and Hunting Creek and I-495 on the south, although it also includes JPP. The NRHP district is slightly smaller than the current boundaries of the Old and Historic Alexandria District, which was expanded in 1984 by City of Alexandria Ordinance 2959. This district, which extends further south, west, and north than the NRHP district, has local significance but has been previously found ineligible for NRHP listing for Section 106 purposes.

The Alexandria Historic District (NRHP) is significant under NRHP Criteria A and C. It contains one of the largest concentrations of 18th and 19th century urban architecture in Virginia, and collectively with the National Historic Landmark portion is one of the finest historic cityscapes in the United States. NRHP documentation indicates the period of significance for this larger historic district spanning from 1732 through the first third of the 20th century (ca. 1933). The Alexandria Historic District (NRHP) contains three NHLs – Gatsby's Tavern, Christ Church, and the Franklin and Armfield Office.

D. Noise

JPP is located close to the vehicular traffic of the WWB and the air traffic of Reagan National Airport. Both vehicular traffic and aircraft traffic are sources of noise at JPP. Noise generated by vehicular traffic on the bridge was analyzed in the WWB FEIS and FSEIS. Please refer to these documents for the analysis of traffic noise from the new bridge.

Additional noise studies were completed during 2000-2001 in accordance with the VDOT Noise Abatement Committee requirements to address specific traffic noise generation. These noise studies determined that, due to the height of the WWB relative to JPP, there would be no noise impacts within JPP at the areas of frequent human use as a result of design year traffic on the bridge. These reports are available for inspection at the WWB Replacement Project offices.

E. Utilities

Existing utilities located within the project's proposed construction limits include electrical distribution and service lines, telephone, water, and sanitary sewer. The existing WWB has two separate electrical feeds that provide power to the operator's tower and the bascule mechanism. Both of these two power feeds run through JPP to the WWB. Feed "A" travels overhead along Lee Street from the north, then runs underground near the intersection of Lee Street and Lee

Court, and continues underground along the closed portion of the Lee Street right-of-way toward the south side of the WWB. Feed "B" travels overhead along Fairfax Street from the north past the dead end, then turns into the forested area towards the east. Feed "B" continues overhead through the trees toward the east until it intersects the closed portion of the Lee Street right-of-way, at which point it runs underground and continues south to the existing WWB. Further, there are overhead electrical distribution lines that run toward the east from the intersection of Lee Street and Lee Court through the forested area towards the JPP parking areas. These lines feed into construction trailers and the Jones Point Lighthouse. Additional overhead lines travel along the closed portion of the Lee Street right-of-way, which temporarily feed into other construction trailers and roadway lighting along Jones Point Park Drive.

Telephone lines travel with the electrical distribution lines, which feed service to construction trailers and the Jones Point Lighthouse. These lines travel along the Lee Street right-of-way and through the woods towards the JPP parking area. An additional phone line runs through the woods from the end of Fairfax Street in a southeast direction to the Lee Street right-of-way along a separate path from the electric lines.

Sanitary sewer lines travel along both sides of Lee Street towards the south. At the end of Lee Street, they turn toward the southwest prior to reaching Jones Point Park Drive and continue to a point underneath the existing WWB. They continue west to tie into a sewer line along Royal Street under the bridge. Another sewer line runs down Fairfax Street and turns east to tie into the sewer line on Lee Court.

A water line travels along the eastern side of Royal Street through the project area. Water lines also are located on Fairfax Street, Lee Court, and Lee Street. There is also a water line that runs from the end of Lee Street into the closed right-of-way serving the community gardens. This water line is located within the proposed access improvement area.

F. Safety and Security

In December 2000, the City of Alexandria City Council approved the conceptual mitigation plan for JPP due to effects from construction of the new WWB. Included in this plan was a design for access and parking under the new WWB. The original plan for access and parking contained in the 2001 JPP EA provided approximately 240 parking spaces under the WWB with a dedicated space for a bridge operator.

Since the events of September 11, 2001, there has been a heightened threat level in the Washington Metropolitan Area. Because of these events, the original plan to include parking under the new WWB was abandoned. At the request of the FHWA, the TSA reviewed a recommendation from the Virginia and Maryland Departments of Transportation that vehicles be restricted from accessing and parking beneath the new WWB and within an 80-foot distance measured from the north and south parapet driplines of the bridge. This recommendation was based on threat assessments conducted by the WWB Replacement Project and the USCOE. The federal TSA conducted an emergency response review and issued a concurrence with this recommendation.

5.0 ENVIRONMENTAL CONSEQUENCES

This section describes the environmental consequences associated with each alternative to the proposed action.

Summary of Environmental Regulations

- National Environmental Policy Act (NEPA), 1969: 42 U.S.C. Section 432f et seq. Recognizing the profound impact of man's activity on the social, economic, and natural environment, Congress directs all agencies of the federal government to report on actions affecting the environment and include:
 - (i) The environmental impact of the proposed action.
 - (ii) Any adverse environmental effects which can not be avoided should the proposal be implemented.
 - (iii) Alternatives to the proposed action.
- The Council on Environmental Quality (CEQ) Regulations: 40 CFR 1500-1508. provide guidance to implement the provisions of NEPA.
- NPS Organic Act, August 25, 1916: Public Law 64-235. Congress created the NPS within the Department of Interior to:
 - ... conserve the scenery and the natural and historic objects and the wild life therein, and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.
- NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision Making (2001), and its accompanying handbook, includes procedures to comply with NEPA and CEQ regulations.
- NPS Management Policies, 2001: Park managers must preserve park resources "unimpaired;" qualifying impairment to mean reaching a level that violates the Organic Act. "That level is reached when an action that is taken would permanently impair essential park resources that are fundamental to the values and purposes for which a park was established." These policies are reiterated in the more recent Draft NPS Management Policies of 2006.
- National Historic Preservation Act (NHPA) of 1966: The nation's primary historic preservation law (16 U.S. C. 470). The Act was designed to bolster the preservation and wise use of our historic resources, and set forth the policy of the federal government regarding historic preservation, encouraging conditions in which historic properties can be preserved in harmony with modern society while fulfilling modern society's needs. The Act created the NRHP, the nation's official list of districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and cultures and are worthy of preservation.

General Methodology for Analyzing Impacts

To determine impacts, methodologies were identified to measure the change in park resources that would occur with the implementation of the alternatives. Impact thresholds were established to help understand the extent and magnitude of changes in resource conditions. In the absence of quantitative data, best professional judgment was used to determine impacts.

Potential impacts are described in terms of:

- Type are the effects beneficial or adverse.
- Context are the effects site-specific, local, or regional.
- Duration are the effects short-term (lasting during construction activities, one year or less) or long-term (longer than one year).
- Intensity are the effects negligible, minor, moderate, or major.
- Impairment would the effects permanently impair park resources or values.

The terms "impact" and "effect" are used interchangeably throughout this document.

Impairment Analysis

The NPS Management Policies (2001) require an analysis of potential effects to determine whether or not actions would impair park resources. The fundamental purpose of the national park system, as established by the Organic Act and reaffirmed by the General Authorities Act, as amended, begins with a mandate to conserve park resources and values. NPS managers must always seek ways to avoid, or to minimize to the greatest degree practicable, adversely impacting park resources and values. However, the laws do give the NPS the management discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of a park, as long as the impact does not constitute impairment of the affected resources and values.

Although Congress has given the NPS the management discretion to allow certain impacts within a park system unit, that discretion is limited by the statutory requirement that the agency must leave park resources and values unimpaired, unless a particular law directly and specifically provides otherwise. The prohibited impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values. An impact to any park resource or value may constitute an impairment, but an impact would be more likely to cause impairment to the extent that it has a major or severe adverse effect upon a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park. (The Capper-Cramton Act of 1930, as amended, was the establishing legislation for the George Washington Memorial Parkway, including JPP).
- Key to the natural or cultural integrity of the park.

• Identified as a goal in the park's general management plan or other relevant NPS planning documents. (JPP does not have a general management plan – for this document, the 2001 JPP EA, which contained alternative park design concepts, was used).

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by maintenance personnel, contractors and others operating in the park. The following process was used to determine whether the various action alternatives had the potential to impair park resources and values:

- 1. Reviewed JPP planning documents with regard to the park's purpose and significance, resource values, and resource management goals or desired future conditions.
- 2. Identified NPS management objectives specific to resource protection goals at JPP.
- 3. Determined the type, context, intensity and duration of impacts, as defined above.
- 4. Determined if the magnitude of impact reached the level of impairment as defined by NPS *Management Policies*.

The impact analysis for each alternative includes any findings of impairment to park resources and values.

Mitigation Measures

The Code of Federal Regulations (40 Code of Federal Regulations (CFR) 1508.20) defines mitigation as:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

The discussion of each resource topic includes mitigation measures for potential effects, if applicable.

Impacts Common to Action Alternatives

The access road to JPP (and associated parking) would be located north of the new WWB. Although the park configurations would be slightly modified, the general forms and amenities presented in the WWB FSEIS (April 2000) and 2001 JPP site plan would remain intact. Therefore, all of the action alternatives contain similar impacts associated with construction of

the following proposed improvements in JPP: a park manager's office/comfort station, a promenade/boardwalk, shoreline stabilization, proposed bulkhead, a canoe/kayak launch area, a fishing pier, and the rehabilitation and preservation of the Jones Point Lighthouse and the D.C. South Cornerstone. In addition, the No-Action Alternative and all of the action alternatives will result in impacts to individual trees (one tree greater than 24 inch dbh and 13 trees less than 24 inch dbh along Jones Point Park Drive as a result of the construction of the new inner loop span of the WWB.

Each action alternative contributes to the achievement of the Purpose and Need for the project (refer to Chapter 1.0 of this document), the NPS resource management goals for JPP (refer to Chapter 2.0 of this document), and conditions relevant to JPP as stated in the MOA and the ROD for the WWB Replacement Project (refer to the Appendix).

A. Neighborhoods, Community Facilities, and Services

Guiding Regulations and Policies

The National Environmental Policy Act (NEPA) of 1969, as amended, required all agencies of the federal government to consider and document potential social, economic and environmental impacts of projects eligible for federal funding. The FHWA's Community Impact Assessment: A Quick Reference for Transportation (September 1996) provided guidance in assessing impacts on community resources.

Methodology and Assumptions

JPP does not contain neighborhoods and community facilities and services (e.g.: fire, emergency, places of worship) within its boundaries, with the exception of two community gardens and a recycling center. Therefore, the potential impacts from the project are limited in scope and many of the community impact categories were determined not to be applicable. However, the NPS has received several written comments from citizens that identified visual, noise, and traffic and parking as concerns. The nature and importance of community effects focused on identifying:

- 1. Social Aspects
 - Would certain people or residences be displaced?
 - Would certain people or neighborhoods be separated or set apart from others?
- 2. Public Facilities -
 - Would the project result in relocation or displacement of the community gardens and/or recycling center?
- 3. Mobility and Access
 - How does the project affect short- and long-term vehicular access to public services, and other park facilities? How does it affect parking availability?
 - How does the project affect access to adjacent schools and other facilities?

Visual, noise, environmental justice, visitor experience and use, and safety and security considerations were analyzed and discussed in separate sections of this document.

Impacts on Neighborhoods, Community Facilities, and Services

The following thresholds were used to determine the magnitude of effects on neighborhoods, community facilities, and services:

Negligible: Neighborhoods, community facilities and services would not be affected, or

changes would be below the level of detection.

Minor: Changes in neighborhoods, community facilities and services would be

detectable, although the changes would be slight. May or may not require

mitigation.

Moderate: Changes in neighborhoods, community facilities and services would be

readily apparent. Impact can be mitigated within 5 years using conventional

practices.

Major: High level of permanent change such as: displacement of residences;

increased separation or unintended isolation of neighborhoods and/or activities; elimination of automobile or pedestrian access to public services

and facilities; or more circuitous routing for emergency vehicles.

The No-Action Alternative

The No-Action Alternative will not affect neighborhoods and community facilities and services because the park recreational facilities would not be altered. However, the existing vehicle access road within the park (approximately 300 feet from the closest residence in the Yates Gardens neighborhood) would have to be relocated since it is within the 80-foot distance surrounding the WWB. The No-Action Alternative does not fulfill the Purpose and Need for the project (refer to Chapter 1.0 of this document), the NPS resource management goals for JPP (refer to Chapter 2.0 of this document), conditions relevant to JPP as stated in the MOA, the ROD for the WWB Replacement Project (refer to the Appendix), or the security measures recommended by the federal TSA. As previously stated, the No-Action Alternative is not being considered for improvements to JPP (refer to Chapter 3.0, Section A).

Impacts Common to Action Alternatives

Analysis: The action alternatives would not require any displacements from the Yates Gardens neighborhood nor disrupt community cohesion, community facilities or services (including emergency services). Potential visual and noise effects are discussed in separate sections of this document.

Access to the recycling center would be maintained and relocated to the new end of Royal Street. The new location for recycling center access would have a beneficial, local, long-term, minor effect for residents by providing more direct and closer access in the park. Moving the recycling

center access would not impair park resources or values since it would be relocated adjacent to an existing roadway (Royal Street).

In addition to serving as the vehicular entrance point to JPP, Royal Street serves as a staging area for pick-up/drop-off of students that attend St. Mary's Elementary School. The City of Alexandria would be responsible for identifying alternate access locations for St. Mary's School.

The potential impacts of the vehicle access road and parking areas within JPP are discussed under each action alternative, below.

Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)

Analysis: In addition to the impacts common to all action alternatives, Alternative 1 would place the vehicle access road approximately 100 feet from the closest residence in the Yates Gardens neighborhood. The westernmost parking area under Alternative 1 would be approximately 90 feet from the neighborhood. However, a tree buffer would remain between the access road/parking area and the neighborhood.

Alternative 1 would not impact either the Royal Street or Lee Street community gardens.

Conclusion: Relocating the vehicle access road and parking area would have an adverse, site-specific, long-term, minor effect on neighborhoods and community gardens. Although the existing tree buffer would be reduced, it would continue to shield the neighborhood from park activities. Alternative 1 would result in no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 2 (VDOT "Access Option 5" dated 9/28/04)

Analysis: In addition to the impacts common to all action alternatives, Alternative 2 would place the access road within approximately 65 feet of the closest residence in the Yates Gardens neighborhood. The westernmost parking area under Alternative 2 would be approximately 260 feet from the neighborhood. A tree buffer would remain between the access road/parking area and the neighborhood.

Construction of the vehicle access road proposed under Alternative 2 would impact approximately 170 square feet (0.0039 acre) of the Royal Street community garden and approximately 11,875 square feet (0.27 acre) of the Lee Street community garden. However, the access road would not affect any portion of the Lee Street garden property that is currently being cultivated. The Lee Street garden property would need to be reconfigured and extended north to maintain the same amount of land available for public gardening activities.

Conclusion: Relocating the vehicle access road and parking area would have an adverse, site-specific, long-term, minor effect on neighborhoods and a larger impact on the Lee Street community garden than Alternative 1. Although the existing tree buffer would be reduced, it

would continue to shield the neighborhood from the park activities. Relocating the vehicle access road would have an adverse, site-specific, minor effect on the community gardens since the potential effects would total less than one acre for each garden and the effects to the Lee Street garden would occur to property that is not currently cultivated. Alternative 2 would result in no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)

Analysis: In addition to the impacts common to all action alternatives, Alternative 3 would place the access road within approximately 65 feet of the closest residence in the Yates Gardens neighborhood (similar to Alternative 2). A tree buffer would remain between the access road and the neighborhood.

Construction of the vehicle access road proposed under Alternative 3 would impact approximately 170 square feet (0.0039 acre) of the Royal Street community garden (similar to Alternative 2) and 11,875 square feet (0.27 acre) of the Lee Street community garden (similar to Alternative 2). The Lee Street community garden property would be reconfigured and extended north to maintain the same amount of land available for public gardening activities.

Conclusion: Relocating the vehicle access road in the park would have an adverse, site-specific, long-term, minor effect on neighborhoods and a larger impact on the Lee Street community garden than Alternative 1 (and similar to Alternative 2). Although the existing tree buffer would be reduced, it would continue to shield the neighborhood from park activities. Relocating the vehicle access road would have an adverse, site-specific, long-term, minor effect on the community gardens since the potential effects would total less than one acre for each garden and the effects to the Lee Street garden property occurs on land not currently cultivated. Alternative 3 would result in no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)

Analysis: In addition to the impacts common to all action alternatives, Alternative 4 would place the vehicle access road within approximately 65 feet of the closest residence in the Yates Gardens neighborhood (similar to Alternatives 2 and 3). A tree buffer would remain between the access road and the neighborhood.

Alternative 4 would impact approximately 170 square feet (0.0039 acre) of the Royal Street community garden (similar to Alternatives 2 and 3). Alternative 4 would impact approximately 10,770 square feet (0.25 acre) of the Lee Street community garden; however, the vehicle access road would not affect any portion of the garden property that is currently being cultivated. The

Lee Street community garden property would be reconfigured and extended north to maintain the same amount of land available for public gardening activities.

Conclusion: Relocating the vehicle access road in the park would have an adverse, site-specific, long-term, minor effect on neighborhoods and a greater impact on the Lee Street community garden than Alternative 1 (similar to Alternatives 2 and 3). Relocating the vehicle access road would have an adverse, site-specific, long-term, minor effect on the community gardens since the potential effects would total less than one acre for each garden and the effects to the Lee Street garden property occurs on land not currently cultivated. Alternative 4 would result in no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation Measures

A tree buffer would remain between the vehicle access road in the park and the Yates Gardens neighborhood to reduce potential visual and noise effects. The Lee Street community garden would be reconfigured and extended north to maintain the same amount of land available for public gardening.

Mitigation measures may include scheduling of park construction to occur during times of low usage, scheduling construction during least disruptive hours, and provision of secondary access during construction. Temporary paths to and through the area and detour/guide signs are among the tools available to facilitate pedestrian and vehicle movements during construction. Public information programs would advise area residents and park patrons of the timeframe for construction activities. Notification would occur through press releases; notices on the NPS, City of Alexandria, and WWB Replacement Project websites; and posted signs at the park. The NPS would continue public involvement activities throughout planning and design activities.

B. Visual and Aesthetic Conditions

Guiding Regulations and Policies

The National Environmental Policy Act (NEPA) of 1969, as amended, requires all agencies of the federal government to consider and document potential social, economic and environmental impacts of projects eligible for federal funding. NPS Management Policies and responsibilities under the 1916 NPS Organic Act are "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

Methodology and Assumptions

The approach to impact assessment was based, in part, on the FHWA's Visual Impact Assessment for Highway Projects (March 1981) and the USDA Forest Service's Landscape Aesthetics: A Handbook for Scenery Management (1995).

Graphics were developed to illustrate example perimeter barrier systems and potential views to and from the barriers (see Figures 10, 11, 12, and 13). The perimeter barrier concepts could be implemented for any of the four potential action alternatives. A series of subjective observations was used to identify and determine impacts and perceived visual changes introduced by the project. Viewer exposure, in terms of distance and duration of exposure, was assessed. The visual impacts of project alternatives were determined by assessing the visual resource changes due to the project and predicting viewer response to those changes. "Viewsheds" were identified on which to base potential impacts. A viewshed is comprised of all the surface areas visible from an observer's viewpoint and includes the locations of viewers likely to be affected by visual changes brought about by project features.

The nature and importance of visual effects were assessed by identifying:

- 1. The existing visual environment
 - What are the limits of the visual environment adjoining the project and the distance of existing views?
 - What are the components that characterize the visual environment?
 - What major viewer groups are likely to see the project and from where?
- 2. Key views of important features -
 - What visually distinct features are in the project area and from where can they been seen?
 - What visual resources and views are recognized as important to park patrons (such as natural areas, historic resources, and monuments).
- 3. The visual appearance of project components in relation to important visual resources (renderings and cross-sections were used for illustration, in some instances).

Impacts on Visual and Aesthetic Conditions

The following thresholds were used to determine the magnitude of effects on visual and aesthetic conditions:

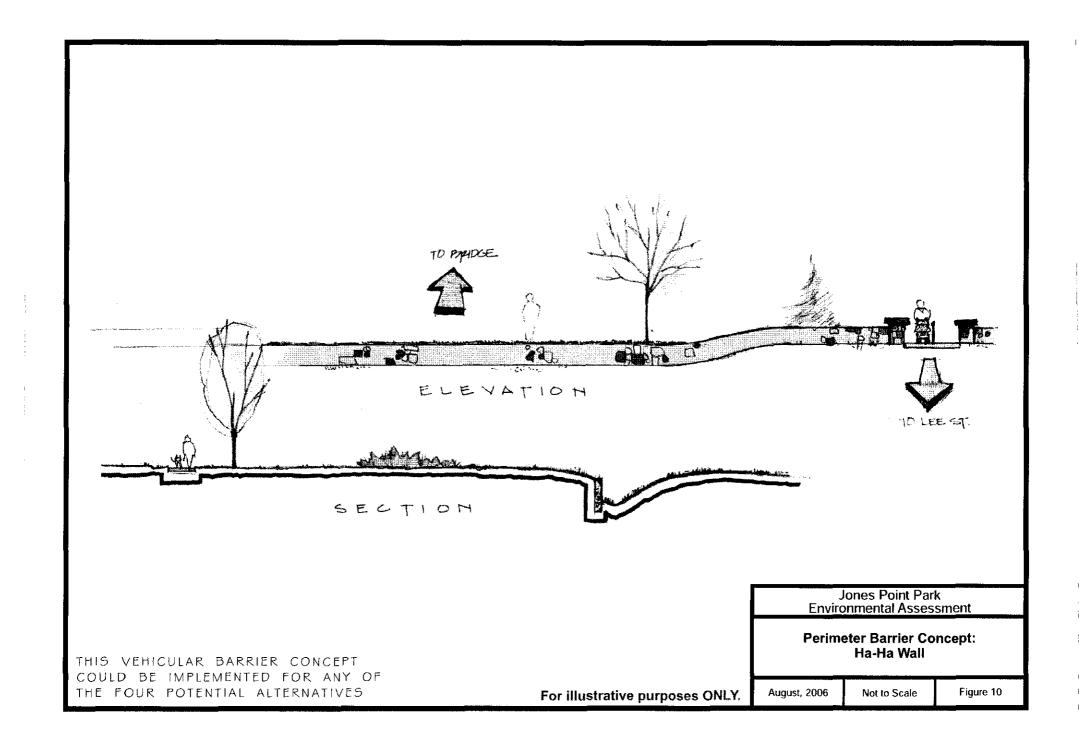
Negligible: Visual resources would not be affected, or changes in visual and aesthetic

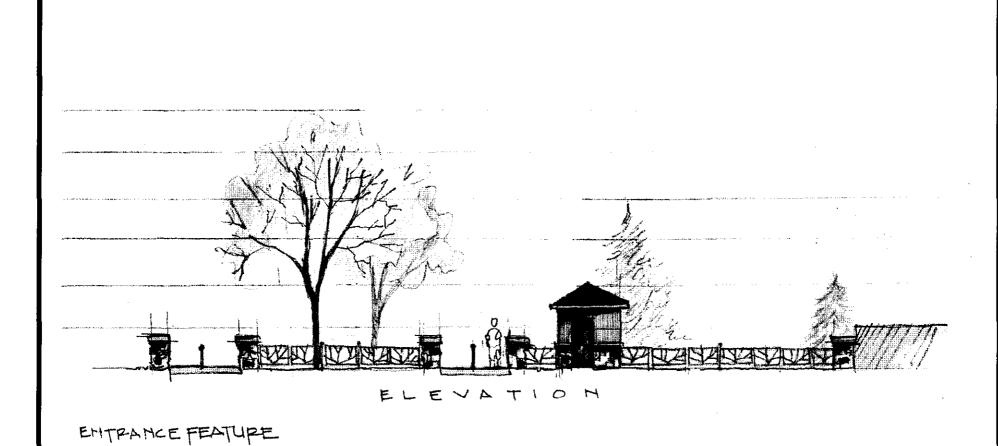
conditions would be below the level of detection.

Minor: Changes in visual resources would be detectable, although the changes would

be slight. Low viewer response to change in the visual environment. May or

may not require mitigation.





THIS VEHICULAR BARRIER CONCEPT COULD BE IMPLEMENTED FOR ANY OF THE FOUR POTENTIAL ALTERNATIVES

For illustrative purposes ONLY.

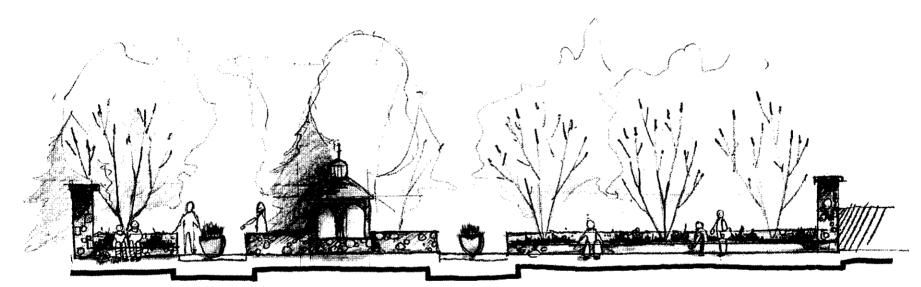
Jones Point Park Environmental Assessment

Perimeter Barrier Concept: Masonry Piers and Hardened (Reinforced) Fence

Ausust, 2006

Not to Scale

Figure 11



ELEVATION

EMPPANCE FEATURE

THIS VEHICULAR BARRIER CONCEPT COULD BE IMPLEMENTED FOR ANY OF THE FOUR POTENTIAL ALTERNATIVES Jones Point Park Environmental Assessment

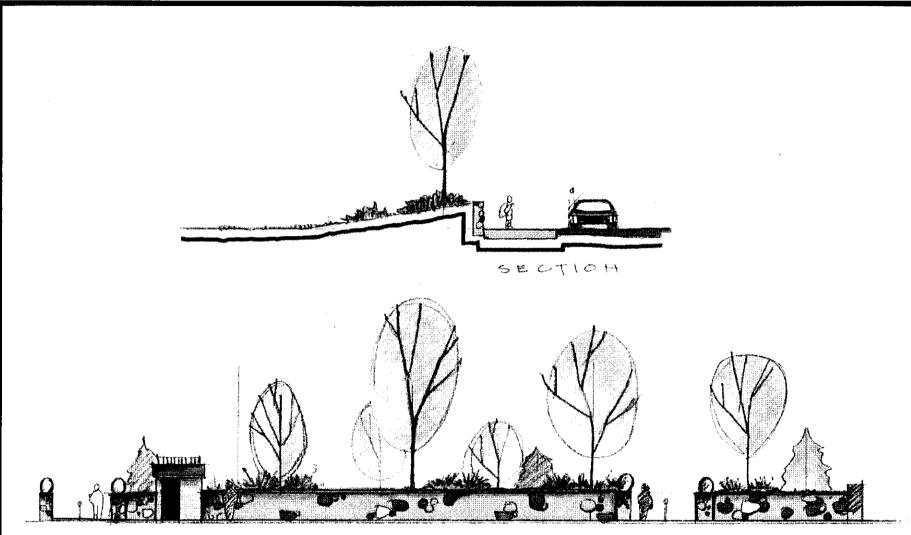
Perimeter Barrier Concept: Masonry Wall

For illustrative purposes ONLY.

August, 2006

Not to Scale

Figure 12



EMTRANCE FEATURES

THIS VEHICULAR BARRIER CONCEPT COULD BE IMPLEMENTED FOR ANY OF THE FOUR POTENTIAL ALTERNATIVES

ELEVATION

Jones Point Park Environmental Assessment

Perimeter Barrier Concept: Masonry Wall with Landform

For illustrative purposes ONLY.

August, 2006

Not to Scale

Figure 1

Moderate: Changes in visual resources would be readily apparent. Impact can be

mitigated within 5 years using conventional practices.

Major: High level of adverse change such as: removal of features that are important

to the park's visual character; project components that contrast with the existing settings or introduce a distracting character or style to a distinctive surrounding environment; project components that create undesirable views.

Landscape treatments cannot mitigate the impacts.

The No-Action Alternative

The No-Action Alternative will not affect visual and aesthetic conditions because the park recreational facilities would not be altered.

Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)

Analysis: A perimeter barrier system of decorative fencing, masonry piers, bollards, guardhouse and landscape plantings is proposed north of the 80-foot distance of the WWB. This barrier system would provide an aesthetically pleasing gateway to JPP. The turnaround at the end of Royal Street would not impact the Royal Street community garden. Construction of the access drive and parking areas would not impact the existing vegetative buffer located immediately south of the Royal Street community garden.

Views north from within the park, especially from the trail running parallel to the WWB, would be affected. The northern edge of both multi-use fields would require clearing of forested areas and the parallel field would require clearing to the west. Visitors to the park would note the altered forest edge north and west of the fields. A tot lot would be sited east of the perpendicular soccer field. The tot lot would be landscaped with additional trees and plantings between the north-south multi-use field and the Mt. Vernon Trail. Construction of the perimeter barriers and the two multi-use fields would require the removal of existing trees (refer to the Vegetation section of this document).

Users of the Mt. Vernon Trail would have to pass through a perimeter barrier system. This perimeter barrier system would resemble a gateway, potentially comprised of masonry walls, piers and bollards. Minimal vegetation would be impacted and the gateway would be visually appealing through aesthetic building treatments and additional plantings.

Conclusion: Alternative 1 would have an adverse, site-specific, long-term, moderate effect on the aesthetic and visual resources of the park due to the clearing of the forested areas to accommodate the turnaround, access road, parking areas, and multi-use fields. The intensity of the visual effects of the perimeter barrier system would range from minor to moderate. For example, bollards would have a less natural appearance in the landscape than would the dense plantings. However, the perimeter barrier system located south of the turnaround would have a beneficial, site-specific, long-term, minor visual effect that would improve the park's visual resources by adding a welcoming entrance to the park. The perimeter barrier system in the vicinity of the Mt. Vernon Trail would have a beneficial, site-specific, long-term, minor visual

effect that would improve the park's visual resources by adding a welcoming entrance to the park via the bike trail.

Alternative 1 would result in no impairment of the park's visual and aesthetic resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 2 (VDOT "Access Option 5" dated 9/28/04)

Analysis: Under Alternative 2, visitors would use Royal Street to enter JPP via a turnaround located approximately 200 feet north of the WWB. The turnaround would impact approximately 170 square feet (0.0039 acre) of the Royal Street community garden. The south portion of the Royal Street community garden and the bamboo plants at the edge of Fairfax Street would be impacted during construction. A perimeter barrier system with landscape plantings would be located just south of Fairfax Street and run parallel to the new access road from Royal Street to approximately 100 feet west of the Lee Street pathway. Views from within the community garden and Fairfax Street looking south would be affected, but the perimeter barrier system and plantings would provide a visual and structural buffer of the access road. Deciduous and evergreen trees would be planted between the perimeter barrier system and access road, providing additional screening and visual interest. Views from the elementary school looking east would be slightly affected.

From the turnaround, motorists could access two parking areas via the access road. The road would run parallel to the Royal Street community garden, gently curve to a point east of the Lee Street pathway and run parallel to the WWB at the 80-foot distance, ending just west of the Potomac River. An approximate 50-foot swath would be cleared from Royal Street to the Lee Street pathway, to accommodate the new access road. A forested buffer between the Yates Gardens neighborhood and the JPP access road would remain, but the density of the visual buffer would be reduced. Construction of the turnaround and access road would require the removal of some existing trees west of the Lee Street pathway. The impact of the turnaround, access road, perimeter barrier system, and plantings would have a long-term, site-specific, moderate effect on the visual and aesthetic quality of the park. Clearing of the forested area just south of the Yates Gardens neighborhood would have an adverse visual effect, while the addition of the perimeter barrier system with plantings on both sides would have a beneficial effect. These additions would not impair the park resources.

The access road would impact the Lee Street community garden property; however, the property would be reconfigured and extended north to maintain the same size as the original. The southern and eastern portions of the garden would experience temporary visual impacts due to construction from both the access road and the adjacent 38-space parking area. Views from within the garden would be altered, especially looking east to the new parking area. Evergreen trees planted at the western edge of the parking area would provide screening of the facility.

A 38-space parking area would be located north of the access road and perpendicular to the bridge deck, approximately 160 feet east of the Lee Street pathway. Two multi-use fields, east

of the parking area, would be placed end-to-end, parallel to the bridge deck. The field adjacent to the parking area would require clearing of a partially forested area, while the second field would be located primarily in an existing open area. The access road would terminate at a perpendicular, 74-space parking area east of the second multi-use field. The combination of the two parking areas and two multi-use fields would create a uniform southern edge to the forested area. Construction of the two parking areas, two multi-use fields, and access road would require the removal of some existing trees (refer to the Vegetation section of this document). An adverse, site-specific, moderate impact would occur due to the addition of the 38- and 72-space parking areas in these locations. A long-term impact would result from the placement of the access road, the extension of the garden, and the impact to existing woodlands. Construction for the perimeter barrier system would pose a short-term impact. The addition of multi-use fields and parking areas would not impair the park's resources or values significantly.

A perimeter barrier system potentially comprised of masonry walls and piers, bollards, a guardhouse, and landscape plantings would be located just south of the turnaround. These elements would provide an aesthetic gateway to JPP and the Mt. Vernon Trail, welcoming users while providing the required security measures. The perimeter barrier system would be placed along the 80-foot distance surrounding the WWB and continue just southeast of the 72-space parking area, with a dense planting of deciduous trees and evergreen shrubs. The perimeter barrier system would cross the Mt. Vernon Trail to the Potomac River. The addition of the perimeter barrier system, placed at the 80-foot distance surrounding the WWB, would pose site-specific, long-term, minor impacts not impairing the park's resources. The perimeter barrier system would provide a beneficial effect on safety while some security elements, such as bollards, may add a minor adverse, visual effect.

Some viewsheds from the Mt. Vernon Trail north would be affected by the proposed perimeter barrier system. The perimeter barrier system would be visible from the trail, access road, 38-space parking area, and multi-use fields. Landscape plantings would help obscure the perimeter barrier system and provide screening of the 72-space parking area for trail users. Existing forest and additional landscape plantings located to the north would screen most of the perimeter barrier system from the western edge of the access road and residences. Much of the perimeter barrier system would be visible to those using the eastern portion of the access road or the multi-use fields.

Conclusion: Alternative 2 would have an adverse, site-specific, long-term, moderate effect on the aesthetic and visual resources of the park due to the clearing of the forested areas to accommodate the turnaround, access road, parking areas, multi-use fields, and extension of the Lee Street community garden. The visual effects from the perimeter barrier system would be similar to Alternative 1.

Alternative 2 would result in no impairment of the park's visual and aesthetic resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)

Analysis: A turnaround, located north of the 80-foot distance surrounding the WWB, would allow vehicles to enter JPP. An access road, located approximately 150 feet north of the 80-foot distance surrounding the WWB, would lead to two parking areas containing 50 and 60 spaces each. Construction of the access road would impact the Royal Street community garden and existing bamboo plants at Fairfax Street. A perimeter barrier system with landscape plantings would be located just south of Fairfax Street and run parallel to the new access road to approximately 110 feet west of the Lee Street pathway. Views from within the Royal Street community garden and Fairfax Street looking south would be affected, but the perimeter barrier system and plantings would provide a visual and structural buffer of the access road and parking area. This alternative would require the removal of some existing trees from Royal Street to approximately 110 feet west of the Lee Street pathway (refer to the Vegetation section of this document).

Alternative 3 would impact the Lee Street community garden property; however, it would not affect any portion of the property that is currently being cultivated. Although the garden property would be reconfigured and extended north to maintain the same size as the original, this alternative would require the removal of some existing trees (refer to the Vegetation section of this document). One multi-use field would be located north of the WWB and one to the south. The northern field would be oriented parallel to the bridge approximately 30 feet east of the 60-space parking area. The southern field would be smaller at only 80 x 40 yards and constructed at approximately the same location as the existing field.

A perimeter barrier system potentially consisting of masonry walls and piers, bollards, guardhouse and landscape plantings would provide the required security along the 80-foot distance surrounding the WWB, just south of the turnaround. Together, the structural elements and landscape plantings would create an aesthetically pleasing entrance to JPP and the Mt. Vernon Trail, while providing the required security measures. A perimeter barrier system, with landscape plantings, would add security to the Lee Street pathway. A combination of walls, piers and bollards would create a secure gateway at the path and transition to bollards around the access road and 60-space parking area, terminating north of the parking area.

A perimeter barrier system would be added in the vicinity of the Mt. Vernon Trail. Trail users would have to pass through the perimeter barrier system, which is proposed to resemble a gateway. Minimal vegetation would be impacted and the gateway would be visually appealing through aesthetic building treatments and additional plantings. The perimeter barrier system would have long-term, site-specific impacts upon the park.

Conclusion: Alternative 3 would have an adverse, site-specific, long-term, moderate effect on the aesthetic and visual resources of the park due to the clearing of the forested areas to accommodate the turnaround, access road, parking areas, one multi-use field (north of the WWB), and extension of the Lee Street community garden. The visual effects from the perimeter barrier system would be similar to Alternative 1.

Alternative 3 would result in no impairment of the park's visual and aesthetic resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary

to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

<u>Alternative 4 – Preferred Alternative</u> (One multi-use field south of the WWB)

Analysis: A turnaround, located north of the 80-foot distance surrounding the WWB, would allow entry into JPP. An access road, located approximately 150 feet north of the 80-foot distance, would lead to the existing 81-space parking area. Construction for the access road would impact the Royal Street community garden and the existing bamboo plants at Fairfax Street. A perimeter barrier system with landscape plantings would be located just south of Fairfax Street and run parallel to the new access road to approximately 110 feet west of the Lee Street pathway. Views from within the garden and Fairfax Street looking south would be affected, but the perimeter barrier system and plantings would provide a visual and structural buffer of the access road.

No multi-use fields would be sited north of the WWB. One field would be located in approximately the same location as the existing field, south of the bridge. The field would be oriented northwest/southeast and 80 x 40 yards.

The access road would impact the Lee Street community garden and the existing woodlands located west of the Lee Street pathway. Woodlands east of the Lee Street pathway would have little to no impact since the existing parking area would be used.

Conclusion: Alternative 4 would have an adverse, site-specific, long-term, minor effect on the aesthetic and visual resources on the north side of the park due to the turnaround, access road, and one parking area. The proposed parking area would be located in the general vicinity of an existing parking area which lessens its visual impact. The proposed multi-use field would be located in the general vicinity of the existing soccer fields (south of the WWB) which lessens its visual impact. The visual effects from the perimeter barrier system would be similar to Alternative 1.

Alternative 4 would result in no impairment of the park's visual and aesthetic resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation Measures

Proposed park improvements would avoid effects on park patrons and adjacent residential areas, as much as possible. The following mitigation measures would lessen visual effects to sensitive residential and recreational activities: clearing no more vegetation than necessary, landscaping and planting to screen adjacent activities, using materials and forms for perimeter barriers that complement the character of the park, and landscaping enclosures, as appropriate. Tree loss would be replaced in-kind incorporating appropriate plantings of native species of trees, shrubs

and herbs. The action alternatives maintain a natural vegetative buffer between the Yates Gardens neighborhood and the park.

C. Visitor Use and Experience

Guiding Regulations and Policies

The NPS Management Policies (2001) regarding visitor use state:

"Enjoyment of park resources and values by the people of the United States is part of the fundamental purpose of all parks. The Service is committed to providing appropriate, high quality opportunities for visitors to enjoy the parks, and will maintain within the parks an atmosphere that is open, inviting, and accessible to every segment of American society. However, many forms of recreation enjoyed by the public do not require a national park setting, and are more appropriate to other venues. The Service will therefore:

- Provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks.
- Defer to local, state, and other federal agencies; private industry; and nongovernmental organizations to meet the broader spectrum of recreational needs and demands.

To provide for enjoyment of the parks, the NPS will encourage visitor activities that:

- Are appropriate to the purpose for which the park was established; and
- Are inspirational, educational, or healthful, and otherwise appropriate to the park environment; and
- Will foster an understanding of, and appreciation for, park resources and values or will
 promote enjoyment through a direct association with, interaction with, or relation to
 park resources; and
- Can be sustained without causing unacceptable impacts to park resources or values."²

Methodology and Assumptions

The NPS has worked in a careful and thorough manner with the FHWA and VDOT since 1997 to develop a program that achieves the NPS' interrelated goals of conserving parks and monuments and providing for the enjoyment of these resources in ways that preserve and protect important features, including natural and cultural resources. It is NPS' view that the three central issues of park management – (a) to discover the significance and meaning of each resource, (b) to support the use and enjoyment of cultural and natural resources and (c) to minimize negative effects on them – are achieved through the proposed redevelopment of JPP.

² http://www.nps.gov/policy/mp/chapter8.htm

The NPS and the City of Alexandria's goal for the redevelopment of JPP is a carefully balanced program of active recreation, passive recreation, and interpretation of archeological, historic, cultural, and natural park features. The NPS believes that the proposed JPP redevelopment plan addresses the broad range of park uses recommended by the citizens of the City of Alexandria and regional park visitors.

Impacts on Visitor Use and Experience

The following thresholds were used to determine the magnitude of effects on visitor use and experience:

Negligible: Visitors would not be affected, or changes in visitor use and/or experience

would be below the level of detection. The visitor would not likely be aware

of the effects associated with the alternative.

Minor: Changes in visitor use and/or experience would be detectable, although the

changes would be slight. The visitor would be aware of the effects associated

with the alternative.

Moderate: Changes in visitor use and/or experience would be readily apparent. The

visitor would be aware of the effects associated with the alternative and would

likely be able to express an opinion about the changes.

Major: The effects would be readily apparent, and would result in a substantial

change in visitor use and/or experience in a manner noticeable to the public

and would be markedly different from existing operations.

The No-Action Alternative

The No-Action Alternative will not affect visitor use and experience in JPP.

Impacts Common to Action Alternatives

Analysis: The project would improve and enhance JPP by adding recreational uses and facilities not currently available within the park. These improvements and enhancements include the construction of parking areas, improved pathways, active hard-surface play areas, a tot lot and play equipment, fishing and kayak boat launch areas, and a park manager's office/comfort station. A grassy area would link recreational facilities both north and south of the new WWB and nature and interpretive trails on the park's historical significance. The action alternatives would incorporate the security measures per TSA's recommendations.

All of the action alternatives would provide the following benefits:

- Expanded recreational opportunities for all citizens.
- Improved quality of recreational opportunities for all citizens.
- Improved safety and security of all park visitors.

- Compliance with current ADA standards.
- Expanded interpretive elements that would provide park visitors with an opportunity to learn about the natural and historic environment of the park.

These improvements would provide recreational opportunities within JPP that currently do not exist and improve the conditions that currently exist under and around the bridge.

There is a pedestrian entrance to the park at the end of South Lee Street. Bicycle access occurs along the Mt. Vernon Trail, extends along the waterfront, and continues along the JPP access road, to Lee Street. All of the action alternatives would maintain vehicle access to JPP from Royal Street. Jones Point Park Drive was closed for construction in May 2006 and a temporary vehicular staging area is available. Each action alternative includes a turnaround at the end of Royal Street and an access road (of various lengths) within the park that would lead park patrons to the parking area(s). Pedestrian and bicycle access would remain unchanged.

Prior to the start of the WWB Replacement Project, two wooden fishing piers projected over the concrete foundations of the VSC shipways along the eastern edge of JPP. Neither of these piers was readily accessible to disabled persons. If a park visitor wanted to fish from these piers, he had to follow a narrow path through the woods to get there. The trail through the woods was not "accessible" by ADA standards. One of the fishing piers was removed (as well as the shipways running underneath) to prepare for the new WWB. Under the action alternatives, the remaining fishing pier would be retained (possibly reconstructed based on condition) and another fishing pier would be built in conjunction with the proposed canoe/kayak launch area. The action alternatives would improve fishing opportunities as parking areas, pedestrian paths, and both of the fishing piers would be designed to comply with current ADA regulations.

The existing finishing pier, located north of the new WWB, would be converted to a promenade/boardwalk. Some park visitors have used the finishing pier for fishing activities and it has been reported that some of the park visitors that use this bulkhead for fishing do so from a wheelchair. The proposed conversion of the finishing pier to a promenade/boardwalk would not prevent its use for fishing from either a standing or sitting position. In fact, the conversion would make this area more accessible for the disabled as the proposed promenade/boardwalk, pedestrian paths, and fishing piers would be designed to comply with current ADA regulations.

The action alternatives would increase the distance between the proposed parking areas and the proposed fishing piers located under and south of the new WWB, as discussed in the following sections. These changes could make fishing access more difficult for persons who use a wheelchair since they can currently maneuver close to the existing finishing pier. However, the proposed conversion of the finishing pier to a promenade/boardwalk would not prevent its use for fishing from either a standing or sitting position.

Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)

Analysis: Other than the recreational facilities noted above, Alternative 1 contains two perpendicular multi-use fields north of the WWB. These fields increase the number of active recreational facilities available in the park. However, these fields also require the removal of

some forests and would reduce the amount of area available for passive recreation (such as bird watching and quiet reflection). The construction of two multi-use fields, access road, and parking areas on the north side of the WWB would remove approximately 5 acres of the total 28 acres of forested area available in JPP.

Alternative 1 provides a maximum 110 parking spaces for park visitors (rather than a total 240 parking spaces under the other action alternatives). Under Alternative 1, there is the possibility of spillover parking in the public right-of-way located outside of JPP during events in which a greater number of visitors is expected.

Park visitors who walk, cycle, or drive to JPP to participate in water recreational activities (canoeing, kayaking, and fishing) would have to transport their equipment for a longer distance to access the Potomac River. Water access is currently approximately 340 feet from the interim parking area located north of the WWB. Alternative 1 would increase the distance to the shoreline by approximately 1,400 feet (for a total of 1,740 feet) between the proposed easternmost parking area and the new fishing pier and canoe/kayak launch area to be located south of the new WWB.

Conclusion: Overall, Alternative 1 would have a beneficial, local, long-term, major effect on visitor use and experience due to the expanded active recreational opportunities that the multiuse fields would provide (in addition to the interpretive elements regarding the natural and historic environment of the park). However, Alternative 1 also would have an adverse, local, long-term, moderate impact associated with the provision of the multi-use fields, access road, and parking areas which would reduce, by 5 acres, the amount of forested area available for passive recreation north of the WWB. Alternative 1 would also require park patrons to transport water gear a much longer distance to access the Potomac River for water recreational uses. Construction activities would have an adverse, site-specific, short-term, moderate effect due to introduction of construction equipment, signage, and pedestrian barriers in active construction areas.

Alternative 1 would result in no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 2 (VDOT "Access Option 5" dated 9/28/04)

Analysis: Alternative 2 contains two parallel multi-use fields to be located north of the WWB. Although these fields expand the active recreational facilities available in the park, they also require the removal of some forests and would reduce the amount of area available for passive recreation (such as bird watching and quiet reflection). The construction of two multi-use fields, access road, and parking areas on the north side of the WWB would remove approximately 6 acres of the total 28 acres of forested area available in JPP.

Alternative 2 provides 110 parking spaces for park visitors plus "event parking" under the WWB (for a total 240 parking spaces). If a larger number of visitors is expected, then the City of

Alexandria could provide the appropriate security measures and make available the additional event parking spaces under the WWB. Therefore, park visitors are expected to have ample parking opportunities under Alternative 2 (compared with Alternative 1).

Alternative 2 would increase the distance to the shoreline by approximately 220 feet (for a total of 560 feet) between the proposed easternmost parking area and the new fishing piers and canoe/kayak launch area to be located south of the new WWB.

Conclusion: Overall, Alternative 2 would have a beneficial, local, long-term, major effect on visitor use and experience due to the expanded active recreational opportunities that the multi-use fields would provide (in addition to the interpretive elements regarding the natural and historic environment of the park). Compared with Alternative 1, Alternative 2 has one additional acre of forest impact north of the WWB and reduces the distance to less that half of that under Alternative 1 to access the Potomac River for water recreational uses.

Alternative 2 would have an adverse, local, long-term, moderate impact associated with the provision of the multi-use fields, access road, and parking areas which would reduce the amount of forested area available for passive recreation north of the WWB. Construction activities would have an adverse, site-specific, short-term, moderate effect due to introduction of construction equipment, signage, and pedestrian barriers in active construction areas.

Alternative 2 would result in no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)

Analysis: Alternative 3 contains one multi-use field north of the WWB and one multi-use field south of the WWB. These fields expand the active recreational facilities available in the park. The multi-use field south of the WWB would replace the existing soccer field and would not impact forests/vegetation. However, the multi-use field located north of the WWB would require the removal of some forest habitat and would reduce the amount of area available for passive recreation (such as bird watching and quiet reflection). The construction of one multi-use field, access road, and two parking areas on the north side of the WWB would remove approximately 5 acres of the total 28 acres of forested area available in JPP.

Alternative 3 provides 110 parking spaces for park visitors plus "event parking" under the WWB (for a total 240 parking spaces). If a larger number of visitors is expected, then the City of Alexandria could provide the appropriate security measures and make available the additional event parking spaces under the WWB. Therefore, park visitors are expected to have ample parking opportunities under Alternative 3 (compared with Alternative 1).

Alternative 3 would increase the distance to the shoreline by approximately 650 feet (for a total of 990 feet) between the proposed easternmost parking area and the new fishing pier and canoe/kayak launch area to be located south of the new WWB.

Conclusion: Overall, Alternative 3 would have a beneficial, local, long-term, major effect on visitor use and experience due to the expanded active recreational opportunities that the multi-use fields would provide (in addition to the interpretive elements regarding the natural and historic environment of the park). Alternative 3 allows a shorter distance to access the Potomac River for water recreational uses than under Alternative 1, but a longer distance compared with Alternative 2. Alternative 3 would have an adverse, local, long-term, moderate impact associated with the provision of the multi-use fields, access road, and parking areas which would reduce the amount of forested area available for passive recreation north of the WWB. Construction activities would have an adverse, site-specific, short-term, moderate effect due to introduction of construction equipment, signage, and pedestrian barriers in active construction areas.

Alternative 3 would result in no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

<u>Alternative 4 - Preferred Alternative</u> (One multi-use field south of the WWB)

Analysis: Alternative 4 contains one multi-use field south of the WWB that would not require the removal of forests; however, the proposed access road and parking area on the north side of the WWB would remove approximately 3 acres of forest. Alternative 4 minimizes impacts to forests by shifting the proposed parking area east of the major forested area and maximizes the amount of forested area available for passive recreation (such as bird watching and quiet reflection) on the north side of the WWB.

Alternative 4 provides 81 parking spaces for park visitors plus "event parking" under the WWB (for a total 240 parking spaces). If a larger number of visitors is expected, then the City of Alexandria could provide the appropriate security measures and make available the additional event parking spaces under the WWB. Therefore, park visitors are expected to have ample parking opportunities under Alternative 4 (compared with Alternative 1).

Alternative 4 would increase the distance to the shoreline by approximately 600 feet (for a total of 940 feet) between the proposed easternmost parking area and the new fishing pier and canoe/kayak launch area to be located south of the new WWB.

Conclusion: Overall, Alternative 4 would have a beneficial, local, long-term, moderate impact because of the expanded interpretive and recreational opportunities but would decrease the number of active recreational facilities available in the park by eliminating one of the existing two soccer fields. Alternative 4 also reduces the amount of forested area available for passive recreation (due to the access road and parking area) and has a longer distance to access the Potomac River for water recreational uses. However, the proposed parking area would be located in the general vicinity of the existing parking area, which reduces its potential impacts to forests compared with the other action alternatives. Alternative 4 would have an adverse, local, long-term, minor impact associated with the provision of the multi-use field south of the WWB and access road, parking areas north of the WWB. Construction activities would have an

adverse, site-specific, short-term, moderate effect due to introduction of construction equipment, signage, and pedestrian barriers in active construction areas.

Alternative 4 would result in no impairment of the park's resources because there would not be a major, adverse impact to resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation Measures

The 2000 ROD contains a Table of Commitments to mitigate the potential impacts of the WWB Replacement Project. The following commitments, contained in the ROD, relate to visitor use and experience. These commitments were incorporated into the design concept plans for the redevelopment of JPP to mitigate the potential impacts of the JPP improvements:

- Incorporate unused portions of land, currently under the existing bridge in JPP, into the recreational/educational aspect of the park. Unused areas under the new bridge are slated for hard-surface recreation uses.
- Provide access to JPP during construction.
- Maintain a single pier on the eastern shore of the park, south of the proposed bridge during and after construction of park improvements.

Access to the Mt. Vernon Trail would remain open to the public during construction of the JPP improvements. The recreation fields, fishing areas, and other park resources would remain open to the extent that they can maintain safe conditions during construction of the improvements. The design concept plan provides temporary parking areas north of the WWB.

Coordination would continue with the NPS, City of Alexandria, JPP Stakeholder Participation Panel, regional and state government agencies; technical consultants; and the general public during the JPP planning process to create a park that fulfills the development goals for JPP.

D. Environmental Justice Populations

Guiding Regulations and Policies

Title VI of the Civil Rights Act of 1964 (and related statutes) require federal agencies to ensure that their programs, policies and activities do not allow populations to benefits from, or subject persons and populations to, discrimination because of race, color, or national origin. Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations reaffirms the principles of Title VI. The Executive Order requires that each federal agency identify and address, as appropriate, any disproportionately high and adverse human health and environmental effects of its programs, policies, and activities on minority and/or low income populations and to provide opportunity for participation in the public involvement process.

Disproportionately high and adverse effect on minority and low-income populations means an adverse effect that:

- 1. Is predominately borne by a minority population and/or a low-income population, or
- 2. Will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.³

Methodology and Assumptions

There are no environmental justice (minority and/or low-income) populations that live within the boundaries of JPP. Subjective observations were used to identify and determine potential impacts to minority populations that use the existing fishing area.

Impacts to Environmental Justice Populations

The following thresholds were used to determine the magnitude of effects on environmental justice populations:

Negligible: Environmental justice populations would experience little or no effects from a

change to park resources.

Minor: Changes in park resources would be detectable, although the changes would

be slight. Environmental justice populations would be aware of the effects

associated with the alternative.

Moderate: Changes in park resources would be readily apparent. Environmental justice

populations would be aware of the effects associated with the alternative and

would likely be able to express an opinion about the changes.

Major: The effects would be readily apparent, and would result in a substantial

change to park resources in a manner noticeable to environmental justice

populations and would be markedly different from existing operations.

The No-Action Alternative

The No-Action Alternative will not affect environmental justice populations.

Impacts Common to Action Alternatives

Analysis: Under all action alternatives, the current finishing pier would be changed to a promenade/boardwalk and two fishing piers would be provided within 200 feet of the existing fishing area, along the southeastern edge of the park. Providing fishing opportunities on the south side and beneath the new bridge is expected to reduce potential impacts to minority fishing populations. Fishing activities would be temporarily restricted, for safety reasons, during

³ http://www.fhwa.dot.gov/environment/ejustice/dot_ord.htm .

construction of the JPP park improvements. Appropriate signage would direct park patrons to the new access areas for fishing.

Conclusion: There would be no disproportionately high and adverse human health and environmental effects from the action alternatives on minority and/or low-income populations. The impacts of moving the fishing area would be site-specific, long-term, and minor. All park users, including the minority fishing populations, benefit from improved recreational facilities.

There would be no impairment of the park's resources because there would be no major, adverse impacts to resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation Measures

The 2000 ROD contains a Table of Commitments that lists actions that would mitigate the potential impacts of the WWB Replacement Project as well as the JPP improvements. A copy of the ROD is available for inspection at the NPS and the WWB Replacement Project office. The ROD contains the following commitments to lessen potential effects to environmental justice populations:

- Provide access to JPP during construction.
- Maintain a single pier on the eastern shore of the park, south of the proposed bridge during and after construction of park improvements.

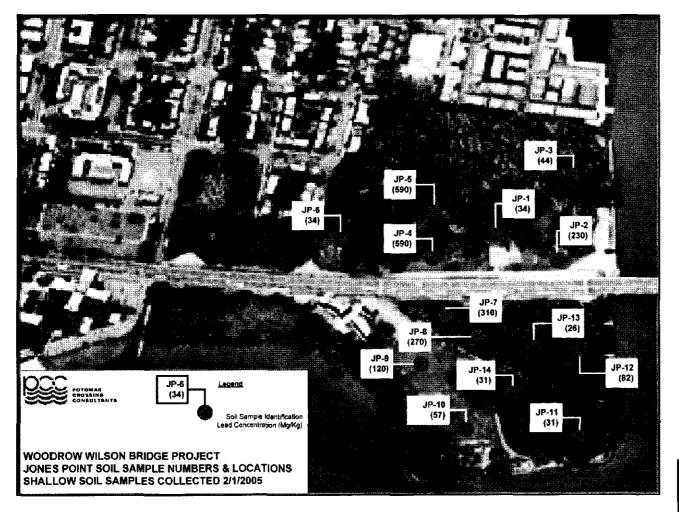
E. Soils

Guiding Regulations and Policies

The Soil and Water Resources Conservation Act of 1977 requires a continuing appraisal of U.S. soil, water and related resources, including fish and wildlife habitats, and a soil and water conservation program to assist landowners and land users in furthering soil and water conservation.

Methodology and Assumptions

The project performed an investigation of lead in shallow soils of JPP in response to concerns by a local resident that high lead levels (originating from historic shipbuilding operations at Jones Point) remain in local soils. Soil samples were collected by hand from a depth of 0 to 0.5-foot below ground surface. Figure 14 shows the locations of the soil testing sites and Table 1 presents the results, which detected lead in every sample at concentrations ranging from 26 milligrams per kilogram (mg/kg) to 590 mg/kg.



JONES POINT PARK LEAD INVESTIGATION SOIL SAMPLE RESULTS

	Total Lead Concentration
Sample Identification	Milligrams/Kilogram (mg/kg) EPA Method 7420
JP-1	34
JP-2	230
JP-3	44
JP-4	590
JP-5	590
JP-6	34
JP-7	310
JP-8	270
JP-9	120
JP-10	57
JP-11	31
JP-12	82
JP-13	26
JP-14	31

 Voluntary Remediation Program (VRP) Tier II, soil screening level concentration for unrestricted (Residential) land use - 400 mg/kg.

> Jones Point Park Environmental Assessment

Lead Investigation: Soil Testing Locations

August, 2006

Scale As S o n

Figure 1

TABLE 1 LEAD INVESTIGATION: SOIL TESTING RESULTS

Sample Identification	Total Lead Concentration Milligrams/Kilogram (mg/kg)
JPP-1	34
ЈРР-2	230
JPP-3	44
ЈРР-4	590*
ЈРР-5	590*
ЈРР-6	34
JPP-7	310
JPP-8	270
JPP-9	120
JPP-10	57
JPP-11	31
JPP-12	82
JPP-13	26
ЈРР-14	31

Note: Soil samples collected on February 1, 2005.

Two soil testing sites (JPP-4 and JPP-5) located north of the WWB in the vicinity of the proposed westernmost multi-use field, contained lead levels of 590 mg/kg which exceeds the Virginia Department of Environmental Quality (VDEQ) maximum safe concentration for soil (400 mg/kg) in unrestricted or residential areas. None of the soil samples contained lead concentrations that exceeded the 800 mg/kg soil screening level for restricted or commercial land uses. VDEQ's Voluntary Remediation Program (VRP) soil screening levels are referenced for guidance and comparison purposes and are not strictly applicable to properties (such as JPP) that are not enrolled in the VRP. If JPP were enrolled in the VRP, it could be regulated as either an unrestricted or restricted property, depending on whether deed restrictions were required by VDEQ.

Impacts to Soils

The following thresholds were used to determine the magnitude of effects on soils:

Negligible: Soils would not be affected or the effects to soils would be below or at the

lower levels of detection. Any effects to soil productivity or fertility would be

slight.

Minor: The effects to soils would be detectable. Effects to soil productivity or

fertility would be small, as would the area affected. If mitigation were needed to offset adverse effects, it would be relatively simple to implement, and likely

successful.

Moderate: The effect on soil productivity or fertility would be readily apparent and

would be reflected in a change to the soil character over a relatively wide area.

^{*}Only soil samples JPP-4 and JPP-5 exceeded the VDEQ Voluntary Remediation Program's maximum safe concentration screening value of 400 mg/kg for soil in unrestricted or residential areas.

Mitigation measures would probably be necessary to offset adverse effects and would likely be successful.

Major:

The effect on soil productivity or fertility would be readily apparent and would substantially change the character of the soils over a large area in and outside of the park. Mitigation measures to offset adverse effects would be needed and would be extensive; their success could not be guaranteed.

The No-Action Alternative

The No-Action Alternative will not affect soils in JPP.

Impacts Common to Action Alternatives

Analysis: The lead concentrations in soil samples JPP-4 and JPP-5 exceeded VDEQ's maximum safe concentration for soil in unrestricted or residential areas. The potential lead exposure risk in the area of samples JPP-4 and JPP-5 could include ingestion of lead-containing soils (by children) or inhalation of lead-containing soils as dust. Also, in these locations, the risk of leaching is slightly increased.

Minor grading is anticipated for the construction of the multi-use fields, tot lot, parking areas, promenade/boardwalk, and new access road. However, the action alternatives would not affect the underlying soils. The potential risk of exposing lead-containing soils could be mitigated during the construction of the multi-use fields by placement of clean fill as part of the field construction as a barrier to prevent future lead exposure. This grading activity would primarily result in the placement of clean fill material on top of existing soils, thereby, leaving the existing soils intact.

Conclusion: Impacts to soils would be adverse, site-specific, short-term, and negligible. There would be no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation

The contractor would implement Best Management Practices (BMPs) during construction. Soil compaction and disturbance would be kept to a minimal amount of area needed for construction activities. Appropriate sediment and erosion control measures (such as the installation of silt fences and inlet protection) would be implemented to reduce soil erosion and runoff from the construction area. Erosion and sediment control measures would comply with the City of Alexandria Standards and the Virginia Erosion and Sedimentation Control Handbook. Disturbed soils would be revegetated based on the recommendations of NPS staff and as specified in the construction contracts.

F. Wetlands and Waters of the U.S.

The various action alternatives associated with the proposed JPP improvement plan would result in unavoidable tidal and non-tidal wetland impacts. Depending upon the alternative chosen, these impacts could be caused by construction of a new access road, parking areas, multi-use fields, playground, and promenade.

Guiding Regulations and Policies

Wetlands and other Waters of the U.S. within JPP are regulated at the federal level by the USCOE under Section 404 of the Clean Water Act. At the state level, tidal wetlands are regulated by the Virginia Marine Resources Commission (VMRC) under the Tidal Wetlands Act (Title 28.2, Chapters 12 and 13), while non-tidal wetlands are regulated by the Virginia Department of Environmental Quality (VDEQ) under the Virginia Water Protection Permit program (Virginia Administrative Code 9 VAC 25-210). Section 401 federal water quality certification is administered at the state level under the Virginia Water Protection Permit program. Additional procedures for protecting and managing wetlands on NPS lands are contained within Executive Order 11990: Protection of Wetlands, NPS Management Policies (2001), Director's Order 77-1: Wetland Protection, and Procedural Manual 77-1: Wetland Protection.

NPS wetland protection policies and procedures include a no-net-loss of wetlands provision. Therefore, proposed development projects within NPS lands that have the potential to adversely impact wetlands must follow a sequence of avoiding adverse wetland impacts to the extent practicable, minimizing wetland impacts that could not be avoided, and compensating for unavoidable wetland impacts through restoration of degraded or former wetland habitats at a minimum 1:1 ratio.

Methodology and Assumptions

To analyze potential impacts from the various alternatives on Waters of the U.S., including wetlands within JPP, all Waters of the U.S. resources within the park were delineated and the boundaries verified by a representative of the USCOE. Direct and indirect impacts associated with each alternative were analyzed from an overlay of the proposed project activity onto all mapped Waters of the U.S., including wetlands resources.

Impacts to Wetlands and Waters of the U.S.

The following thresholds were used to determine the magnitude of effects on Waters of the U.S., including wetlands resources:

Negligible: There would be no measurable or observable impacts to Waters of the U.S., including wetlands or their functions and values beyond what would be

considered natural fluctuations.

Minor:

Impacts would be detectable, but would be expected to be short-term with only minor permanent impacts to wetlands and waterways following project implementation. Principal functions and values of the wetland or waterway system would remain unaffected. Minor impacts to wetlands or waterways may also occur where existing wetland or waterway resources are already disturbed or where the functional capacity or societal values are low. The likelihood of successful compensation for lost wetland and waterway resources would be high and relatively easily accomplished through on-site restoration or enhancement efforts.

Moderate:

Impacts would be detectable and permanent, with the permanent loss of some wetland and waterway resources expected. Wetland and waterway functions and values would not be substantially altered. The likelihood of successful compensation for lost wetland and waterway resources would be high and relatively easily accomplished through on-site restoration or enhancement efforts.

Major:

Impacts would be detectable and permanent, with losses of wetland and waterway resources occurring over a wide area. Wetland and waterway functions and values would not be substantially altered. The likelihood of successful compensation for lost resources is high, although more complicated, because of possible off-site location needs or complex mitigation requirements.

The No-Action Alternative

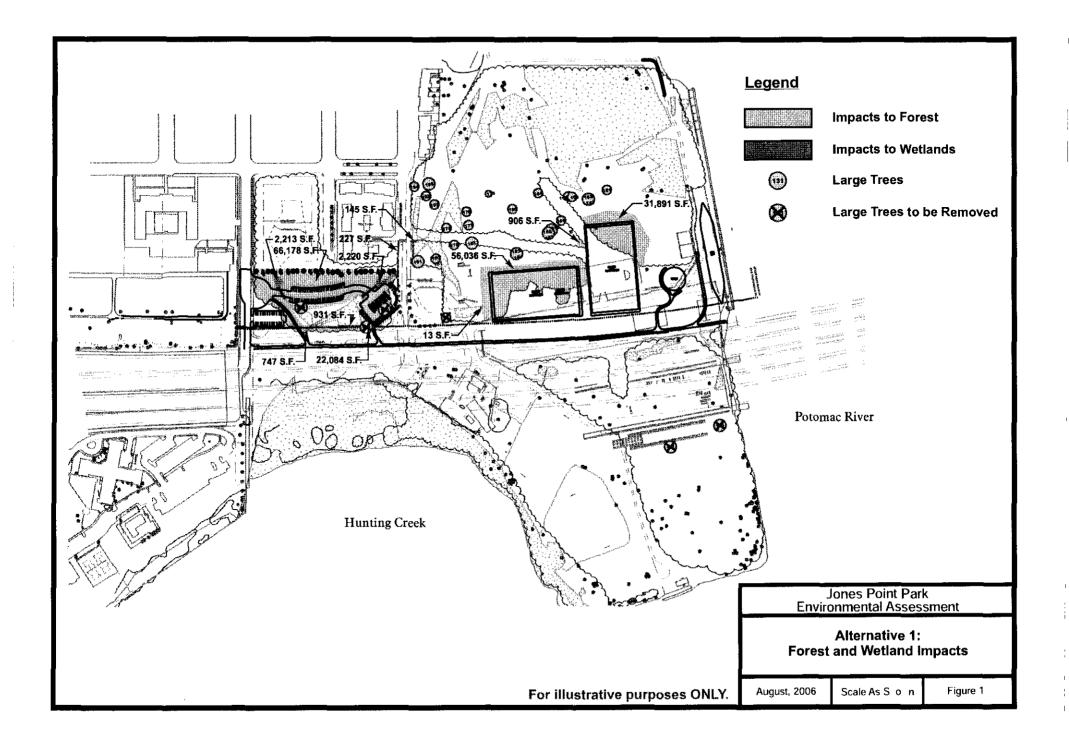
The No-Action Alternative will not affect wetlands and or other Waters of the U.S beyond what has already been authorized as part of the construction for the WWB Replacement Project.

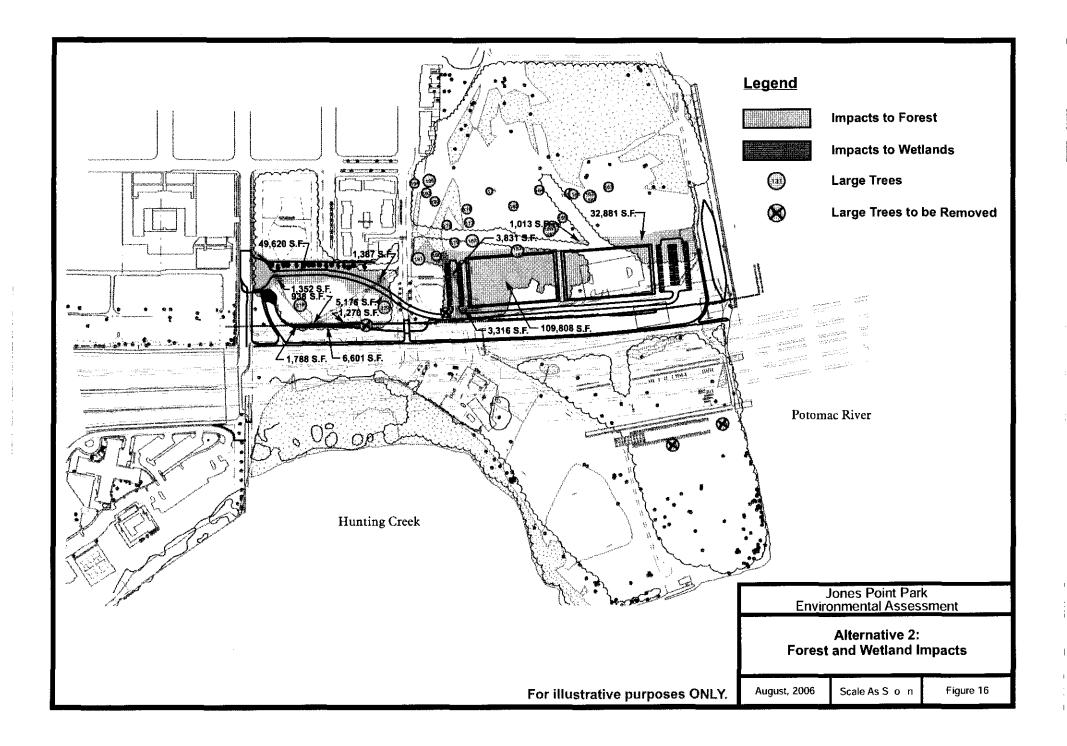
Impacts Common to Action Alternatives

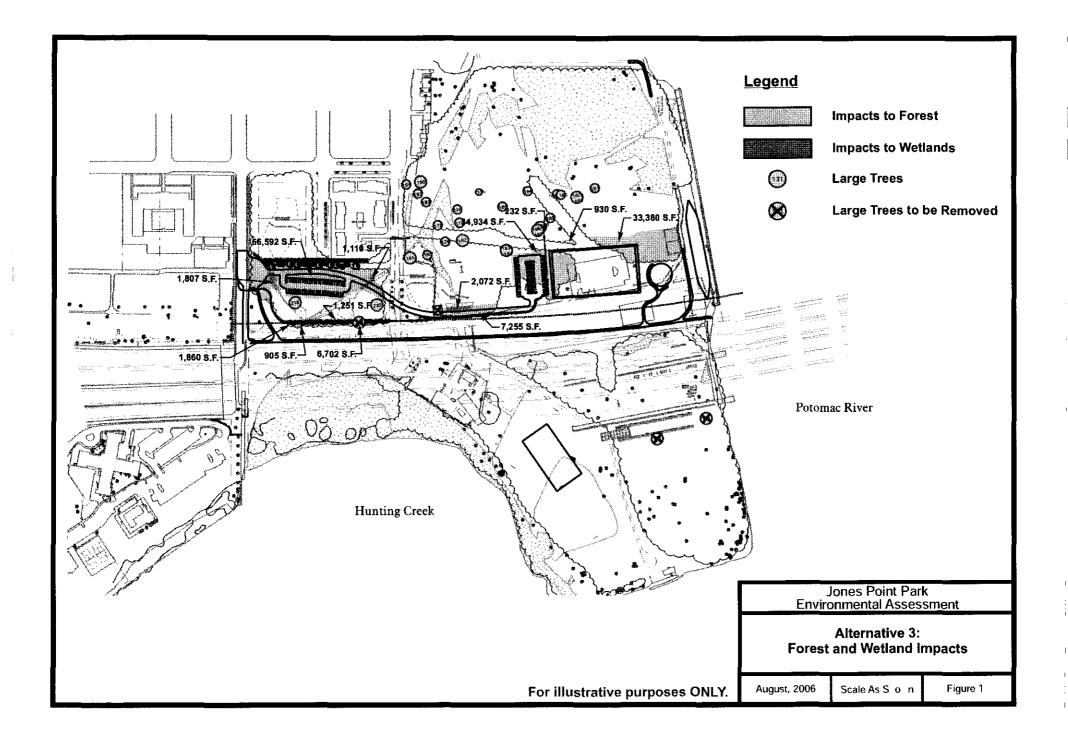
Analysis: Figures 15, 16, 17, and 18 illustrate the location of wetland impacts for each action alternative. The proposed promenade/boardwalk would result in approximately 0.2 acre of impact to tidal emergent wetland and the tidal Potomac River.

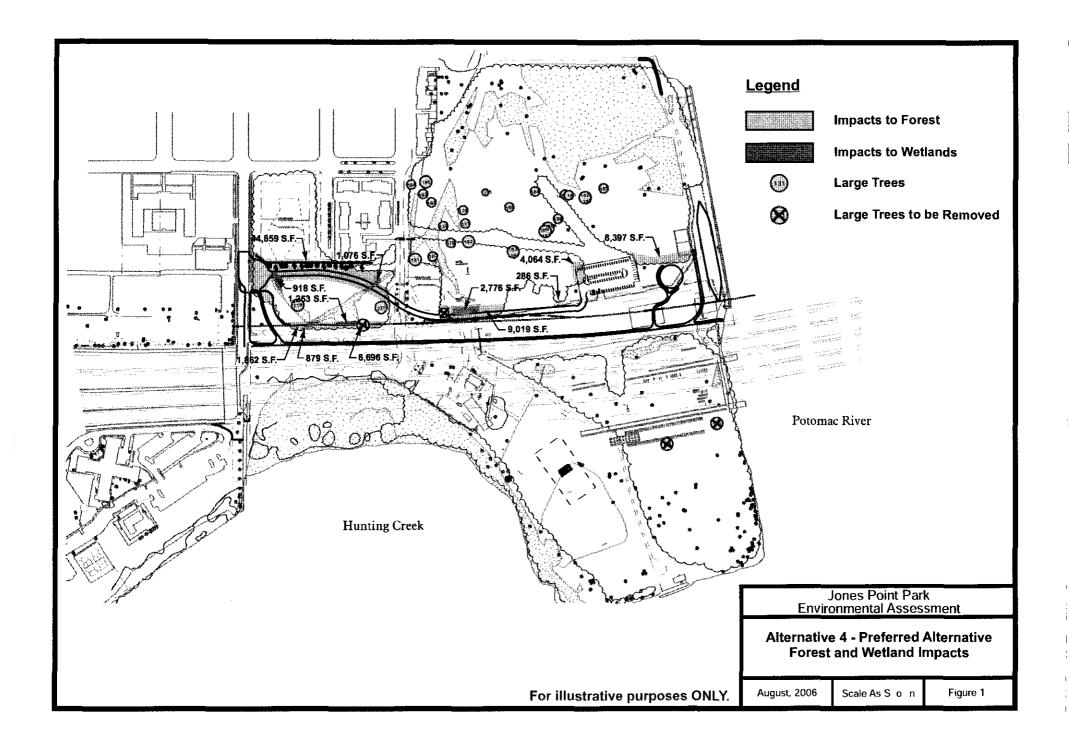
Proposed shoreline stabilization, the rehabilitation of the D.C. South Cornerstone, the preservation of the Jones Point Lighthouse, the proposed bulkhead, canoe/kayak launch, and a fishing pier would impact approximately 0.5 acre of tidal waterways of the Potomac River. Construction of the new bulkhead, canoe/kayak launch, and piers also would result in the impact of approximately 0.8 acre of subaqueous vegetation (SAV) habitat. These SAV beds are not within JPP, but are located just offshore of the park in the Potomac River and lie beneath the new bridge span. The permit for construction of the WWB Replacement Project accounts for potential impacts to tidal waters and SAVs; therefore, these topics are not discussed further in this EA.

On the south side of JPP, clearing is proposed just south of the new bridge to expose the historic shipway and craneway of the VSC for interpretation purposes. No impacts are anticipated to wetlands as a result of this work.









All action alternatives would impact a total of approximately 0.2 acres of tidal wetlands and Waters of the U.S. for construction of the promenade, plus have the impacts listed under each alternative, below.

There are no anticipated additional impacts to wetlands and Waters of the U.S. from maintenance activities or the use of fertilizers or pesticides. These activities occur to a limited extent under the existing conditions within the park, and should not increase appreciably, following park improvements (i.e., impacts would be so small as to be undetectable).

Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)

Analysis: In addition to the impacts common to all action alternatives, Alternative 1 would impact a total of approximately 0.1 acre of non-tidal forested wetlands due to the new access road, parking, and perimeter barriers west of the Lee Street pathway. These wetlands are associated with a drainage swale that discharges into a tidal freshwater marsh south of the existing bridge. Relocation of the proposed multi-use fields and perimeter barriers north of the existing bridge and east of the Lee Street pathway would result in less than one-hundredth of an acre of the total impacts to wetlands.

Alternative 1 includes construction of a tot lot and partial relocation of the Mt. Vernon Trail just north of the proposed ship lawn, between the multi-use fields and the Potomac River north of the new bridge. The location of these facilities would not result in impacts to wetlands.

Conclusion: Total direct wetland impacts under Alternative 1 (including those common to all action alternatives) would be approximately 0.3 acre, comprising about 3% of the total wetland area (12 acres) within the park. Wetland impacts would include approximately 0.2 acre of tidal emergent wetlands and approximately 0.1 acre of non-tidal forested wetlands. Tidal emergent wetland impacts would occur within a disturbed area of the Potomac River between deteriorating wooden piers left over from historic ship building activities. The impact would result from construction of a promenade over the old finishing pier remains. This activity is expected to result in adverse, site-specific, long-term, and minor impacts. In comparison, more extensive tidal emergent wetlands occur on the south side of the park, adjacent to Hunting Creek, which would not be impacted.

Non-tidal forested wetland impacts would occur from construction of a new access road, parking areas, perimeter barriers, and multi-use fields. These non-tidal forested wetlands occur within narrow areas of poor drainage resulting from previous disturbances associated with use of the land for ship building operations. These activities are considered to result in minor, long-term, site-specific, adverse impacts. More extensive and less disturbed non-tidal forested wetlands occur in the northeastern corner of the park. This larger forested wetland area would remain undisturbed by park improvements planned under Alternative 1.

Alternative 1 would result in no impairment of the park's wetland resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 2 (VDOT "Access Option 5" dated 9/28/04)

Analysis: In addition to the impacts common to all action alternatives, Alternative 2 would impact approximately 0.1 acre of non-tidal forested wetlands from construction of the new access road and perimeter barriers west of the Lee Street pathway. Also, approximately 0.2 acre of non-tidal forest impact would occur from construction of the two multi-use fields and parking areas east of the Lee Street pathway. The total impact to non-tidal wetlands resulting from Alternative 2 is approximately 0.3 acre.

Alternative 2 includes construction of a tot lot beneath the bridge and partial relocation of the Mt. Vernon Trail just north of the proposed ship lawn, between the multi-use fields and the river north of the new bridge. The location of these facilities would not result in impacts to wetlands.

Conclusion: Total direct wetland impacts under Alternative 2 (including those common to all action alternatives) would be approximately 0.5 acre, comprising about 4% of the total wetland area (12 acres) within the park. Wetland impacts would include approximately 0.2 acre of tidal emergent wetlands and approximately 0.3 acre of non-tidal forested wetlands. Tidal emergent wetland impacts would occur within a disturbed area of the Potomac River between deteriorating wooden piers left over from historical ship building activities. The impact would result from construction of a promenade over the old finishing pier remains. This activity is expected to result in adverse, site-specific, long-term, and minor impacts. In comparison, more extensive tidal emergent wetlands occur within a less disturbed portion of the park on the south side adjacent to Hunting Creek.

Non-tidal forested wetland impacts would occur from construction of a new access road, parking areas, perimeter barriers, and multi-use fields. These non-tidal forested wetlands occur within narrow areas of poor drainage resulting from previous disturbances associated with use of the land for shipbuilding operations. These activities are expected to result in minor, long-term, site-specific, adverse impacts.

More extensive non-tidal forested wetlands occur in the northeastern corner of the park; however, this larger forested wetland area would remain undisturbed by park improvements planned under Alternative 2.

Alternative 2 would result in no impairment of the park's wetland resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)

Analysis: In addition to the impacts common to all action alternatives, Alternative 3 would result in a total impact of approximately 0.2 acre of forested non-tidal wetlands from the new access road, parking, and perimeter barriers. The relocated multi-use fields and tot lot would not impact wetlands.

Conclusion: Total wetland impacts under Alternative 3 (including those common to all action alternatives) would be approximately 0.4 acre, comprising about 3% of the total wetland area (12 acres) within the park. Wetland impacts would include approximately 0.2 acre of tidal emergent wetlands and approximately 0.2 acre of non-tidal forested wetlands. Tidal emergent wetland impacts would occur within a disturbed area of the Potomac River between deteriorating wooden piers left over from historical shipbuilding activities. The impact would result from construction of a promenade over the old finishing pier remains. This activity is expected to result in adverse, site-specific, long-term, and minor impacts. In comparison, more extensive tidal emergent wetlands occur on the south side of the park, adjacent to Hunting Creek, which would not be impacted.

Non-tidal forested wetland impacts would occur from construction of a new access road, parking areas, and perimeter barriers. These non-tidal forested wetlands occur within narrow areas of poor drainage resulting from previous disturbances associated with use of the land for shipbuilding operations. These activities are expected to result in minor, long-term, site-specific, adverse impacts. More extensive non-tidal forested wetlands occur in the northeastern corner of the park; however, this larger forested wetland area would remain undisturbed by park improvements planned under Alternative 3.

Alternative 3 would result in no impairment of the park's wetland resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 4 – Preferred Alternative (One multi-use field south of the WWB)

Analysis: Alternative 4 involves the construction of a new park access road that extends from Royal Street to a proposed parking area east of the Lee Street pathway and north of the WWB. Alternative 4 also includes construction of a single multi-use field within an existing playing field south of the bridge. A tot lot is also proposed between the northern multi-use field and the ship lawn.

In addition to the impacts common to all action alternatives, Alternative 4 would result in a total impact of approximately 0.2 acre of forested non-tidal wetlands from the new access road and perimeter barriers. The relocated multi-use fields, parking area, and tot lot would not impact wetlands.

Conclusion: Total direct wetland impacts under Alternative 4 (including those common to all action alternatives) would be approximately 0.4 acre, comprising about 3% of the total wetland area (12 acres) within the park. Wetland impacts would include approximately 0.2 acre of tidal emergent wetlands and approximately 0.2 acre of non-tidal forested wetlands. Tidal emergent wetland impacts would occur within a disturbed area of the Potomac River between deteriorating wooden piers left over from historical ship building activities. The impact would result from construction of a promenade over the old finishing pier remains. This activity is expected to result in adverse, site-specific, long-term, and minor impacts. In comparison, more extensive

tidal emergent wetlands occur on the south side of the park, adjacent to Hunting Creek, which would not be impacted.

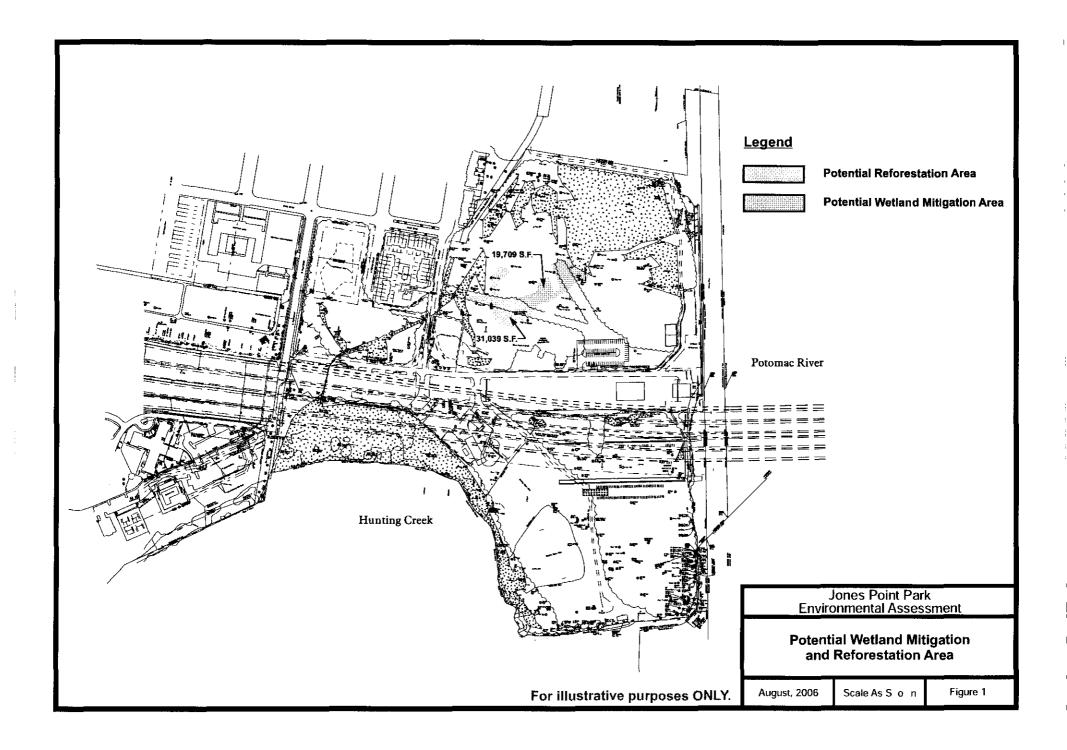
Non-tidal forested wetland impacts would occur from construction of a new access road, and perimeter barriers. These non-tidal forested wetlands occur within narrow areas of poor drainage resulting from previous disturbances associated with use of the land for shipbuilding operations. These activities are expected to result in minor, long-term, site-specific, adverse impacts. More extensive and less disturbed non-tidal forested wetlands occur in the northeastern corner of the park. This larger forested wetland area would remain undisturbed by park improvements planned under Alternative 4.

Alternative 4 would result in no impairment of the park's wetland resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation Measures

Complete avoidance of all wetland and waterway resources within the park is not possible while still accomplishing the Purpose and Need of the proposed project. Because of restrictions on access beneath the WWB brought on by homeland security requirements, the new access road and parking for the planned improvements must be provided in some of the undeveloped portions of the park. Vehicle access would only be available by way of a new entrance road off of Royal Street, and to allow sufficient access and parking, impacts would occur to forested non-tidal wetlands located within the forested area of the park between Royal Street and the Lee Street pathway. Also, improvements to the finishing pier to create a promenade along the Potomac River would result in unavoidable impacts to tidal emergent wetlands that have formed between the deteriorating piers. While complete avoidance of wetland impacts is not possible, Alternative 1 minimizes wetland impacts by removing the planned parking east of the Lee Street pathway, adjacent to the fields and realigning the playing fields. Alternatives 3 and 4 minimize wetland impacts by shifting some of the planned parking east of the Lee Street pathway and providing only a single playing field (Alternative 3) or no playing field (Alternative 4) north of the bridge.

While complete avoidance of all wetland impacts is not possible, impacts can be reduced through wetland mitigation. Wetland mitigation appears feasible north of the bridge and east of the Lee Street pathway within an open power line area and adjacent openings in the forest created by the loss of trees. The existing trees have recently died and fallen as a result of invasive vine coverage. The mitigation proposal would seek to use the open land now covered in vines and connect the proposed mitigation site to the larger, contiguous, seasonally flooded non-tidal wetland (Area 1 according to the wetland delineation report prepared March 1999). Refer to Figure 19. Area 1 is located in the northern portion of JPP and extends from the western park boundary to the footpath in the eastern portion of the park. Although Area 1 is classified as non-tidal it may receive tidal influence from the Potomac River during storm events. Between Area 1 and the proposed mitigation area is an upland forest strip that varies in width from 20-50 feet wide. The connection of the proposed mitigation site with Area 1 would be accomplished



through channels through the upland forest strip. The channels would be designed to avoid impacts to trees and critical root zones.

This proposed mitigation would result in the creation of an approximately 0.5 acre of non-tidal forested wetland depression, requiring the removal of less than 3 feet of soil to provide suitable wetland elevations. This wetland creation would be sufficient to compensate for impacts to forested non-tidal wetland impacts in Alternative 4 – the Preferred Alternative.

Potential impacts to tidal emergent wetlands, associated with construction of the promenade, could be mitigated within this same non-tidal wetland creation rather than creating tidal emergent wetlands elsewhere. This would be preferable, as the tidal emergent wetlands being impacted are of relatively low quality compared to the much more extensive tidal emergent wetlands along Hunting Creek, and there are insufficient areas onsite to compensate in-kind for the loss of tidal emergent wetlands. According to guidance provided in the NPS *Procedural Manual #77-1: Wetland Protection*, wetland impacts must be replaced at a 1:1 replacement ratio.

The on-site wetland creation area would more than compensate for the total 0.4 acre of wetland impacts by Alternative 4 – the Preferred Alternative. An additional benefit from the proposed mitigation option is the removal of the invasive vines that threaten the remainder of the forest within the park.

Guidance contained in the *Procedural Manual #77-1: Wetland Protection* also indicates that wetland compensation typically refers to the restoration of natural wetland functions in degraded or former natural wetland habitats on NPS lands. Much of JPP was historically part of the Potomac River prior to filling in the early 1900s for creation of the shipyard. Therefore, since much of the land now characterized by disturbed forest or open land north of the bridge was originally part of the river, mitigation in the form of wetland creation seems an appropriate form of compensation for minor unavoidable wetland impacts.

The 2000 ROD for the WWB Replacement Project contains a Table of Commitments that would mitigate the potential impacts of the WWB Replacement Project as well as the JPP improvements. A copy of the entire ROD is available for inspection at the NPS and the WWB Replacement Project office. The Table of Commitments indicated that an independent environmental compliance monitor(s) would provide environmental compliance monitoring on all facets of the WWB Replacement Project including improvements to JPP. The monitor(s) have been reporting progress directly to the regulatory agencies and the sponsoring agencies since construction on the WWB Replacement Project began. A separate team of environmental inspectors and state agency representatives have been used to support and assist the sponsoring agencies in their efforts. Additional commitments and environmental compliance protocols would be developed and implemented prior to the start of park improvements.

G. Vegetation, Terrestrial Habitats, and Wildlife

The construction of multi-use fields, parking areas, and a new park access road associated with the action alternatives for planned JPP improvements would result in the loss of terrestrial vegetation, a reduction in size of specific terrestrial habitats, and the potential displacement of wildlife. To enable safe erection of large structural steel for the new inner loop span of the WWB, a large crane will be staged at certain critical lift points along Jones Point Park Drive. This would require removal of one tree greater than 24 inch dbh and trimming or removal of 13 trees less than 24 inch dbh, overhanging Jones Point Park Drive between Royal Street and Lee Street, where potential conflict with construction equipment at certain critical lift points may occur.

Guiding Regulations and Policies

The document *Management Policies 2001* indicates that the NPS will protect native plants and animals as part of the natural ecosystems of parks. The NPS would achieve this through:

- Preserving and restoring the natural abundance, diversities, dynamics, distributions, habitats, and behaviors of native plant and animal populations and communities and ecosystems in which they occur.
- Restoring native plant and animal populations in parks when they have been destroyed by past human actions.
- Minimizing human impacts on native plants, animal populations, communities, and ecosystems, and the processes that sustain them.

Methodology and Assumptions

While no specific regulations against the clearing of forest or other habitats exists in Virginia, the WWB Replacement Project, under an agreement with the NPS and City of Alexandria, proposed to replace lost forest habitat at a 1:1 ratio. Individual trees removed will be mitigated (inch for inch dbh). Trees trimmed will not require mitigation. To analyze potential impacts from the various alternatives on vegetation, terrestrial habitats, and wildlife within JPP, all terrestrial vegetation cover types within the park were mapped. To assess specific impacts to forest habitat and specimen trees, a forest stand delineation was completed within the park following guidance contained within the Maryland Forest Conservation Act's Forest Conservation Manual. Direct and indirect impacts associated with each alternative were analyzed from an overlay of mapped forest limits onto project alternative mapping.

In addition, on July 27, 2006, a site visit was conducted to document trees overhanging Jones Point Park Drive to determine potential tree removals that may occur as a result of the large crane needed to construct the new inner loop span of the WWB.

Potential impacts to birds within the park were analyzed through results of a two-year breeding bird study carried out within the park specifically for this project. Findings of the study are described in the Affected Environment section of this document. An analysis of potential impacts to non-avian wildlife was made based on observations of non-avian wildlife during the two-year bird study and on the potential for wildlife to occur within the habitats likely to be affected by the proposed alternatives.

Impacts to Vegetation, Terrestrial Habitats, and Wildlife

The following thresholds were used to determine the magnitude of effects on vegetation, terrestrial habitats, and wildlife resources within the park:

Negligible:

There would be no measurable or observable impacts to native vegetation, terrestrial habitats, or wildlife and the processes that sustain them. Impacts would be of short duration and well within natural fluctuations.

Minor:

Impacts would be detectable, but would be expected to be short-term with only minor permanent impacts to vegetation and terrestrial habitats. The likelihood of successful compensation for lost forest habitat would be high and relatively easily accomplished through on-site reforestation efforts. Impacts to wildlife would also be detectable, but short-term and temporary, and well within the range of natural variability. Numbers of individuals, population structure, genetic variability and other demographic factors for species might have small, short-term changes, but long-term characteristics would remain stable and viable. Disruptions to individuals may occur from minor disturbance, but overall characteristics of the population, such as reproduction, foraging behaviors, and other factors would persist. Ecosystem functions would sustain short-term disruptions, but would remain within natural fluctuations. Sufficient habitat would remain functional to sustain all existing species. Disturbances would occur outside of critical reproduction periods of sensitive native wildlife species.

Moderate:

Impacts would be detectable and permanent, with the permanent loss of some vegetation and terrestrial habitat expected. The likelihood of successful compensation for lost forest habitat would be high and relatively easily accomplished through on-site reforestation efforts. Impacts to wildlife would also be detectable and permanent, and could be outside the range of natural fluctuations for short periods of time. Mortality or interference with activities necessary for survival could occur to individuals, but is not expected to threaten the continued existence of species within the park. Numbers of individuals, population structure, genetic variability and other demographic factors for species might have small, short-term changes, but long-term characteristics would remain stable and viable. Disruptions to individuals may occur from minor disturbance, but overall characteristics of the population, such as reproduction, foraging behaviors, and other factors would persist. Ecosystem functions would sustain short-term disruptions that could be outside natural fluctuations. Sufficient habitat would remain functional to sustain all existing species, though disturbances could occur within critical reproduction periods of sensitive native wildlife species.

Major:

Impacts would be detectable and permanent, with losses of vegetation and terrestrial habitats occurring over a wide area. The likelihood of successful compensation for lost forest habitat is high though more complicated because of possible off-site location needs or complex reforestation requirements. Impacts to wildlife would also be detectable and permanent, and occur outside

the range of natural fluctuations. Numbers of individuals, population structure, genetic variability and other demographic factors for species might have large, short-term declines, with long-term population numbers being significantly depressed. Ecosystem functions would sustain long-term or permanent disruptions. Loss of habitat may threaten the long-term existence of at least some species.

The No-Action Alternative

Invasive porcelain berry vine continues to spread within existing upland deciduous forest habitat north of the bridge and east of the Lee Street pathway. Coverage by the non-native vine has resulted in the conversion of forest habitat to a dense thicket of vines, reducing vegetation species diversity and likely reducing the diversity of wildlife species using the area. Under the No-Action Alternative, the spread of the vine and further loss of forest habitat would occur without invasive species control efforts conducted by the NPS.

To enable safe erection of large structural steel for the new inner loop span of the WWB, a large crane will be staged at certain critical lift points along Jones Point Park Drive and may require trimming or removal of trees overhanging Jones Point Park Drive between Royal Street and Lee Street. The critical lift plan will not be available until the winter 2006 timeframe so a conservative approach was taken for this EA. This approach assumes that all trees overhanging Jones Point Park Drive would potentially need to be removed. On July 27, 2006, a site visit was conducted to document trees overhanging Jones Point Park Drive and determine the extent that removal of the trees would be required. The worst-case scenario would potentially remove one tree greater than 24 inch dbh and trimming or removal of 13 trees less than 24 inch dbh, with a total of approximately 252 inches dbh.

Impacts Common to Action Alternatives

Analysis: Refer to Figures 15, 16, 17, and 18 that illustrate the location of forest impacts for each action alternative. Vegetation and terrestrial habitat impacts common to all of the action alternatives include approximately one acre of trees, including two trees with a diameter of 24 inches or greater, that would be cleared to allow for the exposure of the shipway and other historic structures for interpretation purposes. This forest area is comprised of silver maple and box elder in the canopy, with multiflora rose, mulberry, and honeysuckle in the understory. This site is disturbed, contains many invasive non-native plants, and provides declining habitat for forest and forest edge birds and other wildlife. Clearing of trees and understory vegetation within this area would reduce the area of habitat for these wildlife species, but is not expected to result in the loss of native wildlife species.

At the northern edge of the craneway of the VSC, native tree and shrub planting is proposed as a screen from the WWB. These plantings are primarily aesthetic and would not enhance the wildlife habitat of the park. In the area located south of the shipway, the existing forest would be cleared of dead trees and invasive species in the understory vegetation. Pedestrian footpaths are also proposed through this area. Much of the understory is presently comprised of non-native invasive species. However, the habitat is still suitable for a broad range of wildlife use.

Following the conversion of the habitat to more of an active setting, wildlife use would be somewhat limited to canopy-nesting birds unless the understory is allowed to regenerate.

Elsewhere on the south side of the park, and to the west, native tree and shrub plantings are proposed along the forested wetland edge adjacent to Hunting Creek. In addition, meadow habitat is also proposed within several swales and on the south side of the park. This enhancement would provide open habitat for butterflies and other species that JPP currently does not provide.

To enable safe erection of large structural steel for the new inner loop span of the WWB, a large crane will be staged at certain critical lift points along Jones Point Park Drive and may require trimming or removal of trees overhanging Jones Point Park Drive between Royal Street and Lee Street. The critical lift plan will not be available until the winter 2006 timeframe so a conservative approach was taken for this EA. This approach assumes that all trees overhanging Jones Point Park Drive would potentially need to be removed. On July 27, 2006, a site visit was conducted to document trees overhanging Jones Point Park Drive and determine the extent that removal of the trees would be required. The worst-case scenario would potentially remove one tree greater than 24 inch dbh and trimming or removal of 13 trees less than 24 inch dbh, with a total of approximately 252 inches dbh.

The action alternatives would contain the spread of invasive porcelain berry vine which would have the beneficial effect on forest habitat. All action alternatives would have a common impact of approximately one acre of forest, including three trees with a diameter of 24 inches or greater, plus have additional impacts as noted under each alternative, below.

Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)

Analysis: Relocation of the proposed multi-use fields and construction of the associated access road, parking, tot lot, pedestrian access trail, and perimeter barriers north of the existing bridge would result in forest clearing totaling approximately 4.1 acres, including three trees 24 inches in diameter or larger. The forest area to be removed for the multi-use fields would total approximately 2 acres. This area is comprised of maples, box elder, and sycamore with a dense tangled understory of invasive and exotic multiflora rose, honeysuckle, porcelain berry, and English ivy. Impacts to wildlife are expected to be minimal due to the disturbed nature of the habitat within the area of the proposed multi-use fields. The loss of some forest cover may eliminate individual territories of some birds and other wildlife, but is not expected to result in the loss of species in the park. Also, native tree and shrub vegetation would be planted along the edge of the multi-use fields and enhance the remaining forested habitat for wildlife.

Deciduous forest impacts west of the Lee Street pathway would occur from the construction of a new access road (0.1 acre), parking (1.6 acres), pedestrian access trail (0.2 acre), and perimeter barriers (0.2 acre) totaling approximately 2.1 acres. Construction of the parking areas would also impact at least one tree 24 inches in diameter or larger, and could possibly impact a second large tree (#218). However, this tree (#218) may be able to be saved if the limit of disturbance for the parking area can be tightened up slightly and the large tree can be carefully root pruned. The perimeter barriers could result in the impact of one additional large tree (#219). However, again, it may be possible to salvage this tree if care is taken during construction of the barriers and the

tree is carefully root pruned. The impacted forest stand is dominated by silver maple in the canopy and many non-native, invasive vines in the understory. Construction of Alternative 1 would eliminate much of the existing forested habitat between the Lee Street pathway and Royal Street, forcing the wildlife using this area into a smaller area. This would result in the loss or displacement of some individuals and perhaps some species that require larger areas of habitat to survive.

Conclusion: Total direct forest habitat impacts under Alternative 1 (including those common to all action alternatives) would be approximately 5.1 acres, comprising about 19% of the total forest habitat area (28 acres) within the park. Forest habitat impacts would include approximately one acre south of the bridge for rehabilitation of the shipway and approximately 4.1 acres north of the bridge for construction of the new access road, parking areas, multi-use fields, pedestrian access trail, and perimeter barriers. Impacts include the removal of up to six trees with a diameter of 24 inches or greater. However, as mentioned above, at least two of the trees may be saved by minor adjustments in the limit of disturbance and care taken during construction. All of these impacted forest habitats occur on previously disturbed lands, and are comprised of many non-native invasive plant species. The largest trees within the park occur along the Potomac River shoreline. With the exception of the two large trees proposed for removal with rehabilitation of the shipway south of the bridge, none of these large riparian trees would be disturbed. Alternative 1 is expected to result in adverse, site-specific, long-term, moderate impacts to forested areas.

Impacts to wildlife are likely to occur to those species that are adapted to more urban and suburban settings. Construction of Alternative 1 would be expected to cause the displacement of numbers of individuals and perhaps the loss of some wildlife species from the existing forest habitat between Royal Street and the Lee Street pathway. However, these displaced species would likely persist within undisturbed forest habitat elsewhere within the park. The most sensitive species of wildlife within the park are canopy-nesting FIDS. While JPP is not viable FIDS habitat, some canopy-nesting FIDS do breed within the park primarily within the large contiguous forest areas north of the proposed park development north of the bridge and along the shoreline of the Potomac River both north and south of the WWB. The canopy vegetation within these areas would remain undisturbed under Alternative 1. Planned activities under Alternative 1 are considered to result in adverse, site-specific, long-term, minor impacts to wildlife.

Alternative 1 would result in no impairment of the park's vegetation, terrestrial habitats, or wildlife resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 2 (VDOT "Access Option 5" dated 9/28/04)

Analysis: Impacts to forest from construction of the new access road (1.2 acres), pedestrian access trail (0.01 acre), and perimeter barriers (0.2 acre) west of the Lee Street pathway would total approximately 1.4 acres, less than Alternatives 1 and 3, because of the lack of proposed parking along the access road. The perimeter barriers could also result in an impact to one tree with a diameter of 24 inches or greater. However, as stated above under the discussion for

Alternative 1, it may be possible to salvage this large tree during perimeter barrier construction. The forest disturbance associated with this alternative represents an encroachment from the perimeter, rather than a splitting of a larger forest block into smaller units. This type of impact would leave more contiguous forest in the interior of the site providing better habitat for wildlife.

The multi-use fields (2.3 acres), access road (0.1 acre), associated parking areas (0.8 acre), and expansion of the existing community garden east of the Lee Street pathway (0.1 acre) would require the clearing of approximately 3.2 acres of forest. This represents over an acre of additional forest impacts east of the Lee Street pathway as compared to Alternative 1.

Conclusion: Total forest habitat impacts under Alternative 2 (including those common to all action alternatives) would be approximately 5.6 acres, comprising about 21% of the total forest habitat area (28 acres) within the park. Forest habitat impacts would include approximately one acre south of the bridge for rehabilitation of the shipway and approximately 4.6 acres north of the bridge for construction of the new access road, pedestrian access trail, parking areas, multiuse fields, perimeter barriers, and expansion of the community garden just east of the Lee Street pathway. Impacts include the removal of up to four trees with a diameter of 24 inches or greater. All of these impacted forest habitats occur on previously disturbed lands, and are comprised of many non-native invasive plant species. The largest trees within the park occur along the Potomac River shoreline. With the exception of the two large trees proposed for removal with rehabilitation of the shipway south of the bridge, none of these large riparian trees would be disturbed. Alternative 2 is expected to result in adverse, site-specific, long-term, moderate impacts to forested areas.

Impacts to wildlife are likely to occur to those species that are adapted to more urban and suburban settings. Construction of Alternative 2 would be expected to cause the short-term displacement of some individuals from the existing forest habitat between Royal Street and the Lee Street pathway. However, the undeveloped forest habitat in this area should be of sufficient size to harbor all species of wildlife currently using the forest patch. The most sensitive species of wildlife within the park are canopy-nesting FIDS. While JPP is not viable FIDS habitat, some canopy-nesting FIDS do breed within the park primarily within the large contiguous forest areas north of the proposed park development north of the bridge and along the shoreline of the Potomac River both north and south of the WWB. The canopy vegetation within these areas would remain undisturbed under Alternative 2. Planned activities under Alternative 2 are expected to result in adverse, site-specific, long-term, minor impacts to wildlife.

Alternative 2 would result in no impairment of the park's vegetation, terrestrial habitats, or wildlife resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)

Analysis: West of the Lee Street pathway, the proposed access road (0.5 acre), parking area (1.0 acre), and perimeter barriers (0.2 acre) would result in forest impacts of approximately 1.7 acres, less than the forest habitat impacts proposed in this area under Alternative 1. Placement of the

perimeter barriers within the existing forest parallel to the bridge could result in the loss of one tree 24 inches in diameter or larger. However, as stated above under the discussion for Alternative 1, it may be possible to salvage this large tree during perimeter barrier construction. Alternative 3 would affect wildlife habitat within JPP through the loss of forest and the increase in human activity anticipated from planned improvements.

East of the Lee Street pathway, Alternative 3 would impact approximately 1.8 acres of forest, somewhat less forest habitat impacts than either Alternative 1 or Alternative 2 in this location. Forest clearing would occur for the multi-use fields (1.1 acres), a new access road (0.2 acre), and parking (0.5 acre). The perimeter barriers could also result in an impact to one tree 24 inches in diameter or larger. However, as stated above under the discussion for Alternatives 1 and 2, it may be possible to salvage this large tree during perimeter barrier construction.

Conclusion: Total direct forest habitat impacts under Alternative 3 (including those common to all action alternatives) would be approximately 4.5 acres, comprising about 17% of the total forest habitat area (28 acres) within the park. Forest habitat impacts would include approximately one acre south of the bridge for rehabilitation of the shipway and approximately 3.5 acres north of the bridge for construction of the new access road, parking areas, multi-use fields, perimeter barriers, and expansion of the community garden just east of the Lee Street pathway. Impacts include the removal of up to four trees with a diameter of 24 inches or greater.

All of these impacted forest habitats would occur on previously disturbed lands, and are comprised of many non-native invasive plant species. The largest trees within the park occur along the Potomac River shoreline. With the exception of the two large trees proposed for removal with rehabilitation of the shipway south of the bridge, none of these large riparian trees would be disturbed. Alternative 3 is expected to result in adverse, site-specific, long-term, moderate impacts on forested areas.

Impacts to wildlife are likely to occur to those species that are adapted to more urban and suburban settings. Construction of Alternative 3 would be expected to cause the displacement of numbers of individuals and perhaps the loss of some wildlife species from the existing forest habitat between Royal Street and the Lee Street pathway. However, these displaced species would likely persist within undisturbed forest habitat elsewhere within the park. The most sensitive species of wildlife within the park are canopy-nesting FIDS. While JPP is not viable FIDS habitat, some canopy-nesting FIDS do breed within the park primarily within the large contiguous forest areas north of the proposed park development north of the bridge and along the shoreline of the Potomac River both north and south of the WWB. The canopy vegetation within these areas would remain undisturbed under Alternative 3. Planned activities under Alternative 3 are expected to result in adverse, site-specific, long-term, minor impacts to wildlife.

Alternative 3 would result in no impairment of the park's vegetation, terrestrial habitats, or wildlife resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

<u>Alternative 4 – Preferred Alternative</u> (One multi-use field south of the WWB)

Analysis: Impacts to forest from construction of the new access road (1.0 acre) and perimeter barriers (0.2 acre) west of the Lee Street pathway would total approximately 1.2 acres, representing the least forest impact west of the Lee Street pathway of all of the action alternatives. The lower impact results from the lack of proposed parking west of the Lee Street pathway and a slight difference in the proposed construction of the access road. The perimeter barriers could also result in an impact to one tree with a diameter of 24 inches or greater. However, as stated above under the discussion for Alternatives 1, 2, and 3 it may be possible to salvage this large tree during perimeter barrier construction. The forest disturbance associated with this alternative represents an encroachment from the perimeter, rather than a splitting of a larger forest block into smaller units. This type of impact would leave more contiguous forest in the interior of the site providing better habitat for wildlife.

East of the Lee Street pathway, forest habitat impacts would be associated with the access road (0.2 acre) and a single parking area (0.3 acre). The single proposed multi-use field would be located on the south side of the bridge within an existing field. It should be noted that the 0.3 acre for the parking area is a worst-case scenario and could possibly be reduced during construction. Avoidance and minimization will be considered further during final design. This alternative would result in the least amount of forest impacts east of the Lee Street pathway as compared to the other proposed action alternatives.

Conclusion: Total direct forest habitat impacts under Alternative 4 (including those common to all action alternatives) would be approximately 2.7 acres, comprising about 11% of the total forest habitat area (28 acres) within the park. Forest habitat impacts would include approximately one acre south of the bridge for rehabilitation of the shipway and approximately 1.7 acres north of the bridge for construction of the new access road, parking areas, and perimeter barriers. Impacts include the removal of up to four trees with a diameter of 24 inches or greater.

All of these impacted forest habitats occur on previously disturbed lands, and are comprised of many non-native invasive plant species. The largest area of relatively undisturbed forest occurs within the northern portion of the site and is associated primarily with non-tidal wetlands discussed above. Proposed park improvements under Alternative 4 would not disturb this forest stand.

The largest trees within the park occur along the Potomac River shoreline. None of these large riparian trees would be disturbed, with the exception of the two large trees proposed for removal with rehabilitation of the shipway south of the bridge. Alternative 4 is expected to result in adverse, site-specific, long-term, minor impacts to forested areas.

Impacts to wildlife are likely to occur to those species that are adapted to more urban and suburban settings. Construction of Alternative 4 would be expected to cause the short-term displacement of some individuals from the existing forest habitat between Royal Street and the Lee Street pathway. However, the undeveloped forest habitat in this area should be of sufficient size to harbor all species of wildlife currently using the forest patch. The most sensitive species

of wildlife within the park are canopy-nesting FIDS. While JPP is not viable FIDS habitat, some canopy-nesting FIDS do breed within the park primarily within the large contiguous forest areas north of the proposed park development north of the bridge and along the shoreline of the Potomac River both north and south of the WWB. The canopy vegetation within these areas would remain undisturbed under Alternative 4. Planned activities under Alternative 4 are expected to result in adverse, site-specific, long-term, minor impacts to wildlife.

Alternative 4 would result in no impairment of the park's vegetation, terrestrial habitats, or wildlife resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents. Alternative 4 is the environmentally preferred alternative.

Mitigation Measures

It would not be possible to completely avoid impacts to all vegetation, terrestrial habitats, and wildlife within the park and still accomplish the purpose and need of the proposed project. Because of restrictions on access beneath the WWB, the new access road and parking for the planned improvements must be accommodated on some of the undeveloped portions of the park. Vehicle access would only be available by way of a new entrance road off Royal Street. To allow sufficient access and parking, impacts would occur to upland and wetland deciduous forest located within the park east and west of the Lee Street pathway. While complete avoidance of vegetation, terrestrial habitats, and wildlife impacts is not possible, Alternatives 3 and 4 minimize these impacts by shifting some of the planned parking east of the Lee Street pathway and providing either only one multi-use field north of the bridge (Alternative 3) or no multi-use field north of the bridge (Alternative 4).

To further minimize impacts to vegetation, terrestrial habitats, and wildlife, efforts will be made during design and construction of the proposed JPP improvements to protect existing forest areas, especially large trees. Maintaining canopy is important particularly for the species of FIDS that were identified in the *Final Supplemental Jones Point Park Consolidated Natural Resources Inventory* (2000) that was completed as part of the FSEIS for the WWB Replacement Project. Two FIDS found at JPP are canopy-nesters, which is why it is critical to maintain canopy wherever possible. This inventory also indicated that JPP provides adequate nesting habitat for numerous Neotropical Migratory Landbird (NML) species as well as Resident Landbirds (RL) who benefit from forest habitat. As available habitat declines, individuals of each of the species observed would also decline. Upland and wetland forest habitats on the northern half of the park, particularly along the Potomac River, provide some of the most important nesting habitat for NML and RL species within the park, including the Baltimore oriole, whose numbers are reportedly declining.

Impacts to valuable forest habitat can be reduced beyond what is proposed through successful compensation in the form of reforestation. Reforestation for JPP forest impacts was referenced in the FSEIS for the WWB Replacement Project, and includes compensation for lost forest habitat at a 1:1 replacement ratio. Reforestation mitigation of approximately 0.7 acre may be feasible on-site adjacent to the area proposed for wetland mitigation, however, a detailed

assessment would need to be made following completion of more detailed wetland mitigation design plans. Refer to Figure 19 for the locations of potential mitigation sites.

Even though Alternative 4, the alternative with least forest impact was selected as the Preferred Alternative, there would still be a need for an additional two acres of reforestation and the planting of approximately 252 caliper inches (Example: 252 1-inch caliper trees) for the removal of individual trees along Jones Point Park Drive to satisfy agency requirements. Other areas within the park that are currently not forested and not proposed for some other park activity would also be assessed for potential use as reforestation land. However, there is a high likelihood that some of the reforestation required to compensate for lost forest habitat would need to occur off-site. Other parklands within the George Washington Memorial Parkway just downstream of JPP would be investigated as potential off-site reforestation lands.

It may also be possible to gain some compensation credit for forest impacts through out-of-kind measures. One such measure may be the eradication of the invasive vines that threaten the remainder of the forest within the park. Removal of these invasive vines would be necessary so that existing and proposed forest areas are not damaged over time by their spread. The vine removal effort would be a long-term maintenance issue that would require a commitment from stakeholders to ensure success. Further negotiations would occur with all stakeholders regarding mitigation for unavoidable forest impacts.

The 2000 ROD for the WWB Replacement Project contains a Table of Commitments that would mitigate the potential impacts of the WWB Replacement Project as well as the JPP improvements. A copy of the Table of Commitments portion of the ROD is available for inspection at the NPS and the WWB Replacement Project office. The ROD contains the following commitments relative to forest impacts:

- Construct trails in JPP with as narrow a path as practical, along an alignment that minimizes the fragmentation of the forest and with minimal tree removal, to maintain habitat for breeding birds.
- Use NPS criteria to mitigate forest impacts at JPP. Replace as much forest mitigation as possible on-site with the remainder off-site.

In addition, the Table of Commitments indicated that an independent environmental compliance monitor(s) would monitor all facets of the WWB Replacement Project, including improvements to JPP. The monitor(s) have been reporting progress directly to the regulatory agencies and the sponsoring agencies since construction of the WWB Replacement Project began. A separate team of environmental inspectors and state agency representatives have been assisting the sponsoring agencies in their efforts. Additional commitments and environmental compliance protocols would be developed for the JPP improvement project and implemented prior to the start of park improvements.

H. Noise

Guiding Regulations and Policies

NEPA provides broad authority and responsibility for evaluating and mitigating adverse environmental effects, including highway traffic noise. NEPA directs the federal government to use all practical means and measures to promote the general welfare and foster a healthy environment.

A more important federal legislation that specifically involves abatement of highway traffic noise is the Federal-Aid Highway Act of 1970. This law mandates FHWA to develop noise standards for mitigating highway traffic noise.

The law requires promulgation of traffic noise-level criteria for various land use activities. The law further states that FHWA may not approve the plans and specifications for a federally-aided highway project unless the project includes adequate noise abatement measures to comply with the standards. The FHWA has developed and implemented regulations for the mitigation of highway traffic noise in federally-aided highway projects. These regulations were originally published as *Policy and Procedure Memorandum 90-2* dated 1973. This was later refined/revised in the *Federal-Aid Highway Program Volume 7, Chapter 3 Section 3* in 1976, and was later streamlined in 1982 under the Federal Register process and included in the Code of Federal Regulation as 23 CFR Part 772. Pursuant to this document, the VDOT has developed a noise policy, which has been approved by FHWA.

Methodology and Assumptions

Noise generated by vehicular traffic on the WWB has been extensively studied from 1996 through 2005. These studies included the 2000 Draft SEIS, 2000 FSEIS and the 2000 *Highway Noise Evaluation Summary*, all of which were prepared for the WWB Replacement Project. These studies, available for public inspection at the NPS and the WWB Replacement Project offices, included data associated with ambient noise conditions for both traffic and recreational noise within JPP.

An extensive literature search was conducted to evaluate the potential noise levels under the proposed WWB structure. The literature indicates that the proposed steel box-girder structure design features would minimize resonation, thereby reducing the potential structure-borne noise in the overall noise environment.

To assess the potential for daytime noise associated with access to and from the multi-use fields, FHWA's Traffic Noise Model® (TNM v2.5®) was used to predict loudest-hour equivalent sound level (Leq, at 18 modeled receptor locations under each of the action alternatives. Maximum local traffic volumes were assumed to be two times (2x) the automobile parking capacity of each proposed design alternative. The generated noise modeling results for each action alternative was assessed versus the predicted design year noise level from I-495/I-95 as proposed and currently under construction.

The trees within JPP were not included in the noise models developed for the preferred I-495/I-95 Alternative. The FHWA Traffic Noise Model User's Guide (FHWA-PD-96-009) states the following with regard to including trees in the noise model:

"TNM computes tree attenuation per the standard of the International Standards Organization ("Acoustics – Attenuation of Sound Propagation Outdoors – Part 2" International Organization Standardization, ISO Standard 9613-2. Geneva, Switzerland: International Organization for Standardization, 1996). This standard requires that trees be sufficiently dense to completely block the view along the propagation path (i.e. view from source to receiver). This requires dense undergrowth as well as dense tree-top foliage. Do not include a TNM tree zone unless its vegetation is very dense."

The project team did not believe that the trees within JPP met the criteria as stated and, therefore, did not include trees within the model. Consequently, the model assesses traffic noise for the worst condition, as if the trees were not there at all.

The design noise levels indicated in the FHWA *Noise Abatement Criteria Activity Relationships* table (CFR 772) were used to determine highway traffic noise impacts and the need for considering abatement measures associated with different land uses or activities in existence at the time of the project approval date.

A number of factors affect sound when it is perceived as noise. These factors include the actual level of sound (or noise), the frequencies involved, the period of exposure to the noise, and the changes or fluctuations in the noise levels during exposure. Noise levels are measured in units called decibels. Since the human ear does not respond equally to all frequencies (or pitches), measured sound levels are often adjusted or weighted to correspond to the frequency response of human hearing and the human perception of loudness. The weighted sound level is expressed in units called A-weighted decibels (dBA) which are the values cited by FHWA in its noise abatement criteria.

Noise-sensitive land uses potentially affected by the action alternatives are in Category B land uses (including residences, motels, hotels, schools, churches, libraries, hospitals, picnic areas, recreation areas, playgrounds, active sports areas, and parks) for which the applicable Noise Abatement Criteria (NAC) in Leq equals 67 dBA. When the predicted design-year build alternative noise levels approach or exceed the NAC during the loudest hour of the day, noise impact occurs and consideration of traffic noise reduction measures are necessary. In December 1993, the FHWA issued guidance on interpreting the word "approach" in section 772.5(g) of 23 CFR as applied to Category B land uses. As a result, the VDOT assess noise impacts when the loudest-hour Leq is equal to or greater than one dBA less than the NAC, which is 66 dBA for Category B land uses. Noise impact also occurs when predicted noise levels associated with the project substantially exceed existing noise levels. An increase of 10 dBA or more above existing levels is considered substantial.

VDOT's Chief Engineer has approved a noise barrier to be placed along the inner loop of I-495/I-95, associated with the WWB Replacement Project. Although traffic noise levels associated with access to/from JPP were anticipated to be substantially below the Category B

threshold, the project team also considered if noise generated by JPP would adversely influence the effectiveness of the proposed noise barriers.

Noise Impacts

The average individual's ability to perceive changes in noise levels is well documented. Generally, changes in noise levels less than 3 dBA would be barely perceived by most listeners, whereas a 10 dBA change normally is perceived as a doubling (or halving) of noise levels. The general principle on which most noise acceptability criteria is based is that a change in noise is likely to cause annoyance wherever it intrudes upon the existing noise from all other sources (i.e., annoyance depends upon the noise that exists before the start of a new noise-generating project or an expansion of an existing project).

According to FHWA impact assessment procedures, traffic noise impacts occur when L_{eq} (1 hour) noise levels "approach" or "exceed" the NAC. The "approach" noise level is defined as equal to or greater than one dBA less than the NAC, which is 66 dBA for Category B land uses at the noisiest traffic hour.

The following thresholds were used to determine the magnitude of potential noise effects within JPP and to adjacent properties:

Negligible: No change in existing noise levels.

Minor: 1 to 3 dBA change in noise levels (barely perceived by most listeners).

Moderate: 3 to 10 dBA change in noise levels (listeners would be aware of the change in

noise levels).

Major: 10 dBA or more above existing noise levels (changes in noise levels would be

readily apparent).

The No-Action Alternative

Selection of the No-Action Alternative would result in noise levels being less than one decibel different than the action alternatives.

Impacts Common to Action Alternatives

Analysis: Traffic traveling over the WWB provides the primary source of noise in JPP. The existing bridge has an open-grated, steel, moveable span with several expansion joints that increase the overall noise environment under the bridge. The new bridge is anticipated to decrease the amount of traffic-generated noise due to the continuous concrete deck with a reduced number of expansion joints and the incorporation of a concrete moveable span.

For all action alternatives, the addition of local traffic to and from JPP is anticipated to create less than a one-decibel (dBA) increase in hourly equivalent sound levels at all 18 modeled receptor locations. This small increase would be indistinguishable from noise levels that would exist without local traffic traveling to and from JPP.

To ascertain the traffic volume required to influence the local noise environment (defined as a perceptible increase in the noise level or +3 dBA), traffic volumes were incrementally increased within the noise prediction model. The results indicate that, to create a perceptible increase to noise levels, approximately 1,500 vehicle pass-bys per hour would be required or more than twelve times (12x) the maximum proposed parking capacity.

For all action alternatives, future recreational noise is anticipated to generate noise conditions similar to currently measured ambient conditions. As stated in the *Highway Noise Evaluation Summary*, predicted future I-495/I-95 traffic noise levels would exceed the ambient and proposed recreational noise conditions. Vehicular traffic noise would dominate the noise conditions in and around JPP and exceed noise generated by recreational uses. Experience has shown that recreational noise is not anticipated to increase over current ambient measurements and would not lead to increases in predicted noise levels. Therefore, noise increases in JPP, if any, are attributed to predicted traffic conditions and not recreational uses.

There may be intervals where the ebb and flow of sounds emanating from recreational activities may temporarily generate noise levels that are discernable above the background and traffic noise sources. These intervals, which are expected to be periodic, could affect the serenity of other areas within JPP. While contemplative and reflective recreational activities are accommodated in the passive recreational areas of JPP, balancing active recreation and passive recreation within the same general facility may cause passive users to distance themselves, temporarily, from the active recreational areas or select areas further south along the Potomac River which would better accommodate passive activities.

Overall, the action alternatives would not create any perceptible noise effects within JPP or to adjacent areas, considering that future recreational noise is anticipated to generate noise conditions similar to currently measured ambient conditions, that daytime local traffic noise would not create a perceptible increase in predicted noise levels, and that no nighttime activities would occur at the JPP multi-use fields.

Construction Noise: Temporary noise impacts may occur from construction activity. Areas around the construction zone would experience varied periods and degrees of noise that differ from that of the surrounding ambient community noise levels. The noise produced by construction can vary greatly based upon the type of construction, the mix of equipment and the construction procedures being employed. Typical operations to construct the proposed improvement would probably require the following types of equipment to be utilized during construction:

- Bulldozers and Earthmovers.
- Graders and Pavers.
- Front End Loaders.
- Dump Trucks and other Diesel Trucks.
- Compressors.
- Jackhammers.

The noise generated by these types of equipment has the potential to temporarily increase the noise levels in the vicinity of the work areas.

Conclusion: The action alternatives are expected to have an adverse, site-specific, long-term, minor effect on noise within JPP or to adjacent areas. The action alternatives would result in no impairment of the park's resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation Measures

No mitigation measures are required for the action alternatives.

<u>Construction Noise</u>: A number of measures can be considered in order to minimize disturbance to the community from noise emanating from construction activities. Such measures include, but may not be limited to:

- Conduct all construction activities in compliance with the Project's agreements with the City of Alexandria under the Comprehensive Special Permit.
- Any internal combustion engine used for any purpose on or related to the project should be equipped with a proper muffler.
- Maintenance of construction equipment should be regular and thorough to minimize noise emission due to inefficiently tuned engines or poorly lubricated moving parts, etc.
- Equipment that requires back-up alarms should be equipped with adjustable systems to allow lower alarm levels, although still in compliance with OSHA, than the maximum.
- When appropriate, locate continuously operated diesel-powered equipment, such as compressors or generators, in areas distant or shielded from noise sensitive areas.

I. Cultural Resources

Methodology and Assumptions

In this EA, impacts on cultural resources are described in terms of type, context, duration, and intensity. This is consistent with the CEQ's implementing regulations for NEPA. These impact analyses are also intended to comply with the requirements of both NEPA and Section 106 of the NHPA. In accordance with Section 106 of the NHPA, impacts on cultural resources were identified and evaluated by 1) determining the area of potential effects; 2) identifying cultural resources within the area of potential effects that are either listed, or eligible for listing, in the NRHP; 3) applying the criteria of adverse effects to cultural resources located within the area of potential effects that are either listed, or eligible for listing, in the NRHP; and 4) considering alternatives that would avoid, minimize, or mitigate adverse effects to cultural resources.

Under the Advisory Council on Historic Preservation's (ACHP) implementing regulations for Section 106 (36 CFR Part 800), a determination of no effect, no adverse effect, or adverse effect must be made for all cultural resources located within the area of potential effects that are either

listed, or eligible for listing, in the NRHP. An adverse effect occurs whenever a proposed project impacts, either directly or indirectly, the characteristics that qualify a property for inclusion in the NRHP.

Adverse effects include, but are not limited to: 1) physical destruction of or damage to all or part of the property; 2) alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access that is not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines; 3) removal of the property from its historic location; 4) change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance; 5) introduction of visual, atmospheric, or audible elements that diminish the property's significant historic features; 6) neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and 7) transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance. Adverse effects also include any reasonably foreseeable effects caused by the proposed project that may occur later in time, be further removed in distance, or be cumulative.

The FHWA's historic preservation responsibilities under Sections 106 of the NHPA for the WWB Replacement Project have been fulfilled through the implementation of a MOA signed in October 1997 and included in the ROD issued in the same year. This MOA was signed by officials of the FHWA, the NPS, the ACHP, the SHPOs of Maryland, Virginia, and the District of Columbia, as well as representatives of a number of consulting parties, including the MSHA, the VDOT, the District of Columbia Department of Public Works (DCDPW), the City of Alexandria, the M-NCPPC, Prince George's County, and the Mt. Vernon Chapter of the DAR. Execution and implementation of this MOA is evidence that FHWA has afforded the ACHP an opportunity to comment on the WWB Replacement Project and its effects on historic properties, and that the FHWA has taken into account the effects of this undertaking on historic properties. A copy of the MOA is included in the Appendix. Since the execution of the MOA in October 1997, the FHWA, the MSHA and the VDOT have proceeded to implement the stipulations of the MOA. The specific actions taken in JPP as part of this implementation are discussed below.

The FHWA, the MSHA, the DCDPW, and the VDOT, in consultation with the Maryland, Virginia, and District of Columbia SHPOs, defined the Area of Potential Effects (APE) for the WWB Replacement Project (Figure 20). The original area of potential effects, defined in September 1995, served as the basis of historic property identification for the January 1996 *Draft Supplemental Environmental Impact Statement* (DSEIS), which assessed the effects of the alternatives considered in that document. Following Section 106 consultation, this area of potential effects was also used for the analysis of alternatives considered in the July 1996 DRAFT SEIS. This original area of potential effects was broadly defined so as to consider all reasonably foreseeable potential effects of the proposed alternatives on historic properties.

As a result of subsequent studies, a clearer understanding of the nature and range of potential effects due to the project was achieved and the area of potential effects for the WWB Replacement Project was revised in April 1997. The revised area of potential effects was based

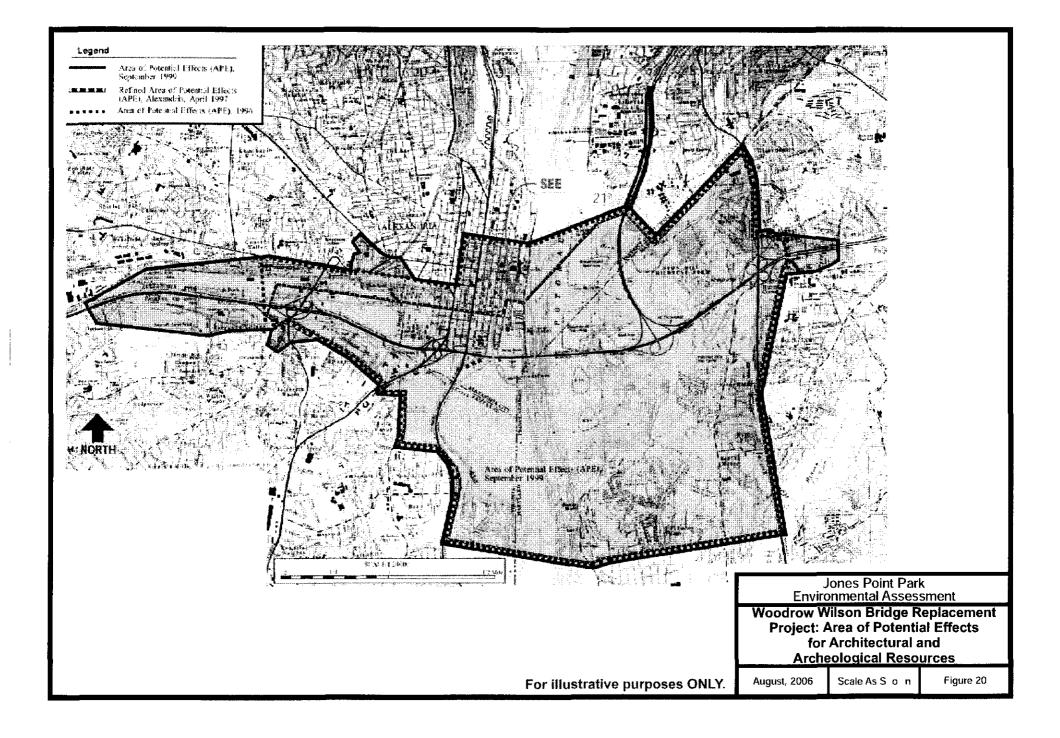
upon more detailed information regarding traffic projections; the size and scale of the proposed bridge and interchanges; and air quality, noise, vibration, and visual effects. This revised area of potential effects was used as the basis for the discussions on the effects to historic resources in the September 1997 WWB FEIS. In September 1999, the area of potential effects for the WWB Replacement Project was again revised due to design changes and the expansion of the project limits that led to additional examination of the effects to historic resources. The discussion of historic resources in the April 2000 WWB FSEIS reflects this change.

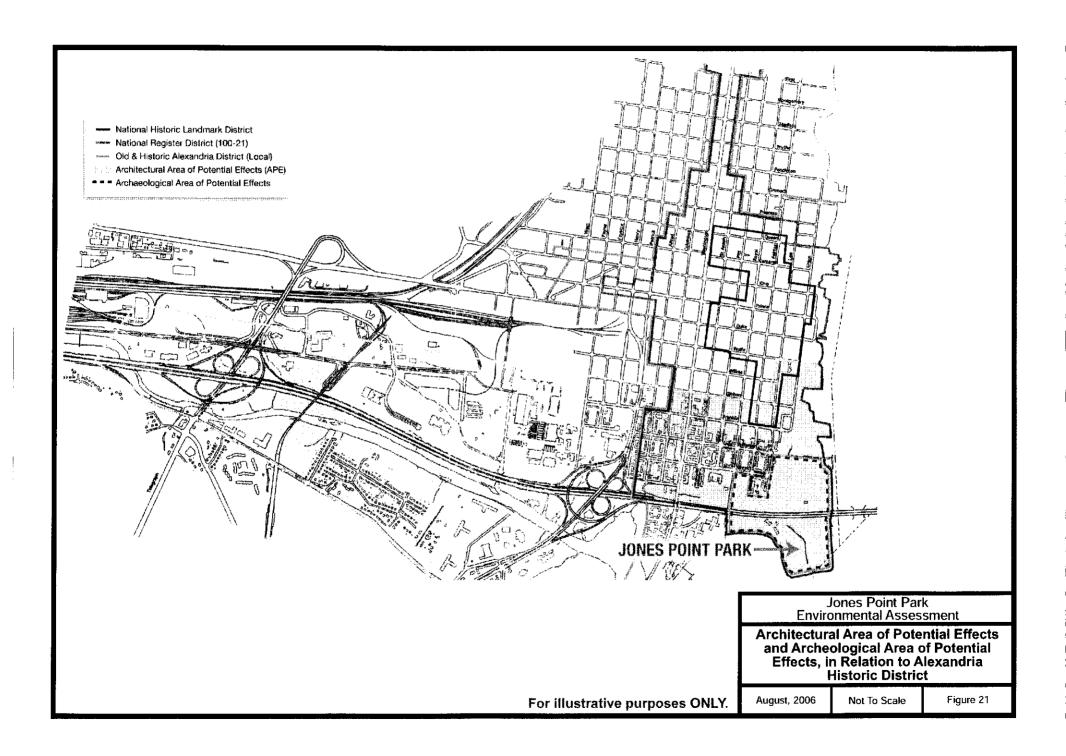
For purposes of evaluating effects of proposed improvements outlined in the JPP EA, a smaller area of potential effects for historic resources has been developed (Figure 21). This area of potential effects for historic resources includes JPP itself, as well as a larger geographic area surrounding the park. The area of potential effects for historic resources encompasses an approximately 24-block area that borders JPP to the north and west. This area of potential effects was delineated to evaluate potential direct and indirect effects associated with visual changes, traffic, parking, and flooding both within JPP and in adjacent areas within the Alexandria National Historic Landmark Historic District and the Alexandria National Register Historic District.

An area of potential effects for archeological resources was delineated specifically for JPP prior to commencing WWB Replacement Project-related archeological investigations in July 2000. Initially, the area of potential effects for archeological resources encompassed only those areas of JPP that would be impacted by the construction of the WWB and impacts that would result from implementing parkland and recreational design concepts. The archeological data derived from the initial and subsequent investigations provided the information required in determining potential impacts to known and suspected site elements. However, ongoing revisions to both construction and park design concepts necessitated expanding the area of potential effects for archeological resources to the entire area encompassed within the present day boundary of JPP. This area of potential effects has been retained by the NPS and is used for purposes of this EA (refer to Figure 21 that shows the area of potential effects for both architectural and archeological resources).

MOA Stipulations

The MOA signed in October 1997 directed, in part, that the FHWA shall, in consultation with the NPS, the Virginia SHPO, and the City of Alexandria, provide improvements within JPP to aid in the recognition of the historic past of the park, and implement measures to document and preserve historic resources within the park. Specified actions included: 1) development and placement of new entrance signage, entry plantings, or other appropriate improvements that convey the historic past of JPP; 2) development and implementation of a system of markers interpreting the history and significance of Jones Point, the Jones Point Lighthouse, and the D.C. South Cornerstone within the park; 3) interpretation of historic landforms and activities/sites within the park; 4) stabilization, preservation and interpretation of the VSC shipways; 5) preparation of a Historic Structure Report, in accordance with NPS standards and guidelines, for the Jones Point Lighthouse to provide a base-line record of its condition at the start of construction; 6) development of a condition report, in accordance with NPS standards and guidelines, for the D.C. South Cornerstone; 7) restoration of the lighthouse and grounds to the condition evidenced by the baseline record, should the lighthouse deteriorate during the





construction period to a degree in excess of normal wear and tear; and 8) riverbank treatments, seawall repair, and landscaping along the boundary of the Jones Point Lighthouse and D.C. South Cornerstone (approximately 200 feet) to provide appropriate public access and allow for long-term protection of the site.

JPP Archeological Preservation Plan

The MOA also provides general guidance on the identification, evaluation and treatment of significant archeological resources that may be affected by future actions associated with the WWB Replacement Project. These actions involve unanticipated changes or modifications to current project designs and/or construction contract specifications that may be required in association with 1) bridge construction, 2) the development of intermediate and final park improvement plans, and 3) the implementation of these park improvement plans.

In 2000-2001, FHWA, in conjunction with VDOT, determined that more specific guidance would assist the Project and the WWB contractors in carrying out the stipulations of the MOA as the Project advanced. More specific guidance was now possible given the extensive archeological and geomorphological information that has been obtained as a result of the investigations conducted for the project to date. Therefore, an archeological preservation plan was developed in 2002 to provide more detailed guidance and describe the archeological preservation procedures to be implemented for 1) bridge construction within JPP, 2) developing intermediate park improvement plans, 3) developing final park improvement plans, and 4) implementing park improvement plans.

An archeological sensitivity map was included with the Archeological Preservation Plan showing the locations of known and potential archeological resources within JPP. It was developed to precisely locate the horizontal and vertical extent of known, significant archeological resources within the park that were to be avoided during WWB construction activities. These resources include the VSC Site (44AX73), prehistoric sites (44AX165 and 53), and prehistoric/historic sites (44AX52 and 185) that extend outside of the new bridge pier foundations, and the 1830s-1850s ropewalk. The VSC Site is represented by the remains of several foundations within the northern portion of the park. Two of the original four shipways located in this area have been subsequently destroyed by bridge construction. The prehistoric sites and ropewalk extend the entire length of the pre-1910 extent of Jones Point. The pre-1910 configuration of the point is delineated on this map, and is considered as one large archeologically sensitive zone, containing significant prehistoric and historic archeological remains. The map also indicates the depth of the point's original prehistoric and historic surface that has been buried by 20th-century fill soils. Depths shown on the map are in relation to Mean Sea Level. Any action that would extend to the base of these fill soils in these locations has the potential to impact significant prehistoric and historic archeological resources. The balance of the park consists of 20th-century fill soils, and is not considered archeologically sensitive.

Jones Point Lighthouse and D.C. South Cornerstone Treatment Plan

In December 2000, FHWA completed the preparation of a Historic Structures Report (HSR) and Treatment Plan for the Jones Point Lighthouse and the D.C. South Cornerstone in accordance

with the 1997 MOA stipulations. The plan provided historic background on the development and evolution of these two resources as well as an assessment of their current condition. An advisory working group with members representing a variety of federal, City of Alexandria, and non-profit organizations with an interest in these historic properties guided the plan. Various staff members of the NPS, the Mt. Vernon Chapter of the DAR, the City of Alexandria, the FHWA, and a variety of consultant firms involved in the development of the HSR and Treatment Plan participated over a two-year period from 2000 through 2001. Specific professional disciplines involved included historic architecture, structural engineering, history, architectural history, landscape architecture, and planning.

A series of treatment alternatives, which ranged from minimal stabilization through complete interior and exterior restoration, were outlined and analyzed within the HSR and Treatment Plan. Alternative 2 – Rehabilitation (Limited) for Exterior Use/Historic Interpretation Only – was the alternative selected for implementation by the NPS and the other members of the advisory working group. This alternative was chosen because it provided the best combination of project actions that achieved multiple historic preservation goals. These included improving the overall condition of both historic properties, increasing protection of each property, decreasing the damaging effects of water on both properties, and improving public education and interpretation opportunities.

The goal of the selected alternative within the Treatment Plan is to accurately depict character-defining features of the site, structures, and object (D.C. South Cornerstone) for the purpose of interpreting significant cultural aspects of these historic properties from 1794 (the date of installation of the D.C. South Cornerstone) through 1926. The presentation of information to the park visitor, aiding in the interpretation of this historic property without detracting from the complex's visual characteristics, is a secondary focus. The lighthouse rehabilitation work would include the following elements: 1) the exterior appearance of the lighthouse (minus chimneys) would be restored through the replacement of missing exterior features); 2) interior conditions and exposed timbers of the lighthouse's structural system would be improved, but would not include rehabilitation of other interior features that would allow the lighthouse to become more fully accessible to the public; 3) earlier projects that were not performed in accordance with appropriate historic preservation standards or that used incorrect materials or details would be corrected.

In order to re-establish the setting of the lighthouse and cornerstone and bring the property up to current Americans with Disabilities Act standards, the following work would also be undertaken within the lighthouse yard and its landscaping: 1) the retaining wall in front and around the lighthouse would be carefully rebuilt behind, with a new hidden modern wall placed behind it for improved protection and stabilization; 2) within the lighthouse's work yard, two missing architectural features – a work shed and a well house – would be reconstructed; 3) one or two maple trees would be replanted in locations where trees have been removed previously; and 4) the site would be made accessible for the physically challenged through a new pathway system that would allow improved viewing of the lighthouse and the cornerstone from the lighthouse yard.

Based on comments received from the NPS and the Virginia Department of Historic Resources that stressed the importance of retaining the cornerstone in its historic location, the following

elements would be implemented to improve the overall condition of the stone, and improve methods of public education regarding this rare object: 1) the concrete vault enclosure surrounding the enclosure would be redesigned and replaced in order to minimize water intrusion and to improve the stone's visibility from the yard above; 2) a new top enclosure would be designed in order to improve the public's ability to view the stone from the lighthouse yard; and 3) a replica of the stone would be placed vertically above, or adjacent to, the original cornerstone, as part of an expanded interpretation program. The conditions assessment was updated in Fall 2003 after Hurricane Isabel made landfall in the project area.

JPP Interpretation Plan

The NPS, the FHWA, and the VDOT remain committed to the development and execution of a comprehensive interpretation program involving the archeological, historic property, and natural features of JPP. This interpretation program includes a series of active and passive elements that have been the focus of considerable comment from federal, state, local agencies and the public from 2001 to 2002. Many of these elements begin with requirements included in the 1997 MOA and include the interpretation of the prehistoric and historic archeological resources located within the park, the D.C. South Cornerstone, and the Jones Point Lighthouse.

During the winter of 2000 and the spring of 2001, the City of Alexandria sponsored a series of meetings with many of its local government committees and members of the public to discuss the park's development. A series of focus group meetings were held. Attendees considered a series of questions including: 1) what should be interpreted at JPP; 2) how much interpretation should occur in JPP; 3) what is the most appropriate form of interpretation; 4) what is the desired tone of the outdoor exhibits; and 5) what are practical concerns with the interpretation. The Interpretive Plan Working Group developed the following purpose and significance statement for the park:

JPP, a unit of the National Park system, serves as a local and regional open space encompassing active and passive recreational opportunities. The park is comprised on significant natural, archeological, and historic resources of local, regional, and national importance.

JPP is part of the National Park system, a federally-owned tract of land located at the southeast corner of Alexandria, Virginia. Its history is inextricably linked to the landform of Jones Point, which is surrounded on three sides by the Potomac River. The park's location relative to Old Town and the river, and the great variety of historic and archeological resources identifiable within its boundaries, help establish its unique character.

Jones Point contains a particularly rich array of archeological sites and historic resources that reflect thousands of years of human habitation. Prehistoric archeological sites dating from the Late Archaic and Early Woodland periods have contained materials, including ceramics and projectile points, associated with Native American hunting and gathering sites and cobble quarry work areas. Archeological properties and historic structures provide a wealth of information on such broad historical themes as changing agricultural use, the growth of the

federal government and the founding of Washington, D.C., expansion of Alexandria as a seaport and maritime center, Alexandria's Civil War heritage, and military use from the 18th through the 20th centuries, especially through a World War I shipbuilding site. The most significant archeological sites and historic properties that relate to these themes include a Late Archaic/Middle Woodland prehistoric site, the D.C. South Cornerstone, Jones Point Lighthouse, Battery Rodgers, and the VSC Site. Jones Point is one of the few areas within the National Capital Region where archeological and historic resources representing thousands of years of continuous human habitation are preserved and interpreted to the public.

The interpretative plan was envisioned as a treatment protocol for the historic properties affected by the WWB Replacement Project, as described in the WWB FSEIS. Work on the development of a comprehensive plan has been focused through the work of the Interpretive Plan Working Group, comprised of representatives of the NPS, the City of Alexandria Department of Parks and Recreation, Office of Historic Alexandria, and the City of Alexandria Archeology Commission. The members of the Interpretive Plan Working Group included representatives with expertise in history, architectural history, archeology, and landscape architecture.

At meetings in the winter and spring of 2001, the Interpretive Plan Working Group examined three designs, and ultimately refined the option for the development of a new heritage trail that would run around the edge of the park to the south of the new bridge, and along the waterfront near the site of the now-demolished VSC. Through this trail, visitors would be encouraged to explore the cultural, natural, and geological heritage of Jones Point as it has evolved over thousands of years.

The focal point of the trail would feature an historical overview of Jones Point and a depiction of Jones Point, over time, using a custom morphing technology. Small waysides along a heritage trail would provide a shovel and magnifying glass to tell a series of focused stories at different locations along the trail. Four larger waysides along the trail would feature different viewscopes where visitors can glimpse Jones Point at various points in history.

This option called for the production of a single, large, hub/station that would serve as the central focal point for park entry. This hub would provide a historical overview for the park, and describe the physical changes associated with changing land use over time. Four (4) trailhead entry signs would be placed at edges of the park and in parking areas to provide improved orientation for visitors. These signs would include space for posting of special events/temporary permits as well as a way-finding map for the park and region.

The plan envisioned various viewscopes, interactive, and mounted interpretive panels. The tentative titles of the stations included: 1) Marsh Wildlife (viewscope panel); 2) Native Americans (large interpretive panel); 3) Margaret Brent (small interpretive panel); 4) Colonial Land Use (interactive panel discussing the ropewalk, tobacco farming, and the quarantine station previously located within the park); 5) Federal City Survey (viewscope panel); 6) D.C. South Cornerstone and the Federal City (large interpretive panel); 7) Lighthouse and Alexandria during the 1800s (interpretive panel and viewscope to Potomac River); 8) the Potomac River (large interpretive panel); 9) Interpreted VSC Shipway; 10) World War I Shipbuilding and the Ship

Lawn (interactive panel); 11) VSC Derrick (mounted panel); 12) Woodland Wildlife/Battery Cove (small interpretive panel); and 13) Battery Rodgers (interactive panel). Work on more fully developing these concepts halted after September 2001 because of JPP security concerns.

The NPS, FWHA, and VDOT are committed to re-establishing the Interpretive Plan Working Group in spring 2007 to guide the completion of all elements of the JPP interpretive plan. The goal of this effort is to have the plan completed by fall 2007 and plan elements installed by the end of spring 2008. The NPS, FHWA, and VDOT also remain committed to the development and completion of a critical element of the park interpretation plan – a Web page available to the public that would describe important elements of the park and its history, including information about archeological and historic properties within the park boundaries. Upon completion, it is anticipated that this page would be presented to either the NPS or the City of Alexandria to host and maintain. It is anticipated that this Web page would be developed, again with broad input from the Interpretive Plan Working Group, in fall 2007, and completed by the end of spring 2008.

The MOA, included in the Appendix, stipulates the procedures to be followed by the FHWA on how project effects on historic properties are taken into account. The 1997 MOA, as executed under the former regulations, is still valid and remains in effect. Therefore, the references throughout the discussion of effects to cultural resources are to the regulation 36 CFR Part 800.

Impacts on Historic and Archeological Resources

The assessment of effects on historic properties listed or eligible for listing in the NRHP follows the criteria outlined in Section 106 of the NHPA. Determinations of Effects on National Historic Landmarks also follow the Section 106 criteria; however, any adverse effects to a NHL are automatically reviewed by the ACHP. The Section 106 regulation defines an "effect" as follows: "...an undertaking has an effect on a historic property when the undertaking may alter the characteristics of the property that may qualify the property for inclusion in the National Register."

In order for a property to be declared eligible for the NRHP, it must possess integrity of location, design, setting, materials, workmanship, feeling, and association, and meet one or more of the following Criteria for Evaluation:

- A. Is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Is associated with the lives of significant persons in our past.
- C. Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or that possess high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.
- D. Has yielded or may be likely to yield, information important in prehistory or history.

Analyses of the potential intensity of impacts on cultural resources were derived from available information on JPP, and the professional judgment of park staff. The following thresholds were used to determine the magnitude of effects on cultural resources:

Negligible: The impact would not be perceptible or would be barely perceptible by most

visitors. For the purposes of Section 106, the determination of effect would be

No Adverse Effect.

Minor: The impact would not affect the character-defining feature(s) of a NRHP-

listed or eligible property. For the purposes of Section 106, the determination

of effect would be No Adverse Effect.

Moderate: The impact would alter the character-defining feature(s) of a NRHP-listed or

eligible property, but would not diminish the integrity of the resource to the extent that its NRHP eligibility is jeopardized. For the purposes of Section

106, the determination of effect would be No Adverse Effect.

Major: The impact would alter the character-defining feature(s) of a NRHP-listed or

eligible property to the extent that it is no longer eligible for listing in the NRHP. For the purposes of Section 106, the determination of effect would be

Adverse Effect.

In all cases, the project may have a beneficial effect on cultural resources if the proposed project complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines. For the purposes of Section 106, the determination of effect would be No Adverse Effect.

To access potential effects of each of the project alternatives on the Alexandria National Historic Landmark Historic District and the Alexandria National Register Historic District, the project team conducted numerous site visits within the JPP area of potential effects, reviewed park-specific hydrological reports, and examined previously-completed historic resource studies pertaining to these districts. The most pertinent of these historic resource studies was the Historic Resources Identification and Evaluation Report, Alexandria Historic District, produced in 1996 for the WWB Replacement Project. This report presented a detailed examination of each historic district, including discussions of current conditions and integrity. The report noted that, while substantial change has occurred, especially within the Alexandria National Register Historic District including construction of the original WWB in 1961, and more modern development such as the Ford's Landing townhouse project located adjacent to JPP, both historic districts continue to retain a sufficient level of significance and integrity to maintain their respective historic designations.

The other assessment methods that were used to measure air quality, noise, and traffic levels and their effects on historic properties that were discussed in Section 4.8.1 of the 1997 FEIS for the WWB Replacement Project remain applicable.

No-Action Alternative

The No-Action Alternative would not alter JPP, the Alexandria National Historic Landmark Historic District, or the Alexandria National Register Historic District. There would be no

ground disturbing activities; therefore, there would be a negligible impact to archeological sites. There would also be no improvements to the Jones Point Lighthouse and D.C. South Cornerstone, leading to the continued deterioration of these resources due to water damage from the Potomac River and heavy rains. There is the potential for continued erosion of the retaining wall and damage to both the foundations of the Jones Point Lighthouse as well as the D.C. South Cornerstone and its protective vault. If the historic resources were not improved, severe, long-term, adverse impacts to historic structures would occur.

Section 106 Summary: In accordance with Section 106 of the NHPA, the No-Action Alternative would have No Adverse Effect on archeological resources and an Adverse Effect on historic structures within JPP. The No-Action Alternative would have No Adverse Effect on the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District.

Alternative 1 (Alexandria City Council's "Scheme A" dated 6/28/05)

Analysis: The construction of two multi-use fields north of the bridge, play areas, a comfort station, and perimeter barriers would require trenching the site for the foundations associated with the security elements. Construction of the parking area would require the grading and paving of a contained area. During construction of these various elements, heavy equipment and vehicles would need access across portions of JPP. The exposure of one of the shipways associated with the VSC Site (44AX78) as a part of planned commemorative and interpretive activities in JPP would also require the use of ground clearing equipment. However, the Archeological Preservation Plan proposes the addition of clean fill in JPP to protect archeological sites. The proposed multi-use fields, play areas, park manager's office/comfort station, perimeter barriers, parking areas and access roads have been located in areas that are either considered to have low archeological potential or that have been cleared for construction by previous archeological investigations (refer to the Geoarcheological Report that is available for inspection at the NPS and the WWB Replacement Project offices during normal business hours). For this reason, Alternative 1 would have a minor, short-term, adverse impact on archeological sites during the construction due to the construction activities.

Alternative 1 proposes the rehabilitation and preservation of the Jones Point Lighthouse and D.C. South Cornerstone, including the rebuilding of the retaining wall and the vault that protects the cornerstone. The rehabilitation and preservation work requires that NPS rebuild the existing wall and vault in addition to construction work at the Jones Point Lighthouse. For this reason, Alternative 1 would have an adverse, site-specific, short-term, minor impact on historic and prehistoric resources during the construction due to the demolition of the existing sea wall and vault and construction activities at the lighthouse.

Section 106 Summary: In accordance with Section 106 of the NHPA, Alternative 1 would have No Adverse Effect on archeological resources and No Adverse Effect on historic structures. Alternative 1 would have No Adverse Effect on the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District.

Conclusion: The implementation of Alternative 1 would have a beneficial, local, long-term, major effect on cultural resources. However, an adverse, site-specific, short-term, minor impact

on cultural resources would occur during the construction phase of the project due to the need to excavate portions of the site and construction activities.

Upon completion of the construction phase of the project, Alternative 1 would have a minor, long-term impact to archeological resources as no further ground-disturbing activities would occur and the exposure of one shipway from the VSC Site (44AX78) would not affect the NRHP-eligibility of this archeological site.

There would be a long-term, beneficial effect on historic properties, as compatible materials would be used for the rehabilitation and preservation of the lighthouse and the construction of the new retaining wall in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The improved condition of the Jones Point Lighthouse and D.C. South Cornerstone would reduce the likelihood of continued damage to these resources over time.

Alternative 1 would result in no impairment of the park's cultural resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents. Alternative 1 would result in no impairment to the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District because changes would not be perceptible or would be barely perceptible to most visitors to each historic district.

Alternative 2 (VDOT "Access Option 5" dated 9/28/04)

Analysis: The construction of two multi-use fields north of the bridge, play areas, a park manager's office/comfort station, and perimeter barriers would require trenching the site for the foundations associated with the security elements. Construction of the parking area would require the grading and paving of three areas connected by access roads. During construction of these various elements, heavy equipment and vehicles would need access across portions of JPP. The exposure of one of the shipways associated with the VSC Site (44AX78) as a part of planned commemorative and interpretive activities in JPP would also require the use of ground clearing equipment. However, the Archeological Preservation Plan proposes the addition of clean fill in JPP to protect archeological sites. Additionally, the proposed multi-use fields, play areas, comfort station, perimeter barriers, parking areas and access roads have been located in areas that are either considered to have low archeological potential or that have been cleared for construction by previous archeological investigations (refer to the Geoarcheological Report that is available for inspection at the NPS and the WWB Replacement Project offices during normal business hours). For this reason, Alternative 2 would have an adverse, site-specific, short-term, minor impact on archeological sites during the construction due to the construction activities.

Alternative 2 proposes the rehabilitation and preservation of the Jones Point Lighthouse and D.C. South Cornerstone, including the rebuilding of the retaining wall and the vault that protects the cornerstone. The rehabilitation and preservation work requires that NPS rebuild the existing wall and vault in addition to construction work at the Jones Point Lighthouse. For this reason, Alternative 2 would have an adverse, site-specific, short-term, minor impact on historic and

prehistoric resources during the construction due to the demolition of the existing sea wall and vault and construction activities at the lighthouse.

Section 106 Summary: In accordance with Section 106 of the NHPA, Alternative 2 would have No Adverse Effect on archeological resources and No Adverse Effect on historic structures within JPP. Alternative 2 would have No Adverse Effect on the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District.

Conclusion: The implementation of Alternative 2 would have a beneficial, local, long-term, major effect; however, an adverse, site-specific, short-term, minor impact on cultural resources would occur during the construction phase of the project due to the need to excavate portions of the site and construction activities.

Upon completion of the construction phase of the project, Alternative 2 would have a minor, long-term impact to archeological resources as no further ground-disturbing activities would occur and the exposure of one shipway from the VSC Site (44AX78) would not affect the NRHP-eligibility of this archeological site.

There would be a long-term, beneficial effect on historic properties, as compatible materials would be used for the rehabilitation and preservation of the lighthouse and the construction of the new sea wall in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The improved condition of the Jones Point Lighthouse and D.C. South Cornerstone would reduce the likelihood of continued damage to these resources over time.

Alternative 2 would result in no impairment of the park's cultural resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents. Alternative 2 would result in no impairment to the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District because changes would not be perceptible or would be barely perceptible to most visitors to each historic district.

Alternative 3 (Based on "Alternative 2" from JPP EA dated 9/10/01)

Analysis: The construction of one multi-use field north of the bridge, one multi-use field south of the bridge, play areas, a park manager's office/comfort station, and perimeter barriers would require trenching the site for the foundations associated with the security elements. Construction of the parking area would require the grading and paving of a two areas connected by an access road. During construction of these various elements, heavy equipment and vehicles would need access across portions of JPP. The exposure of one of the shipways associated with the VSC Site (44AX78) as a part of planned commemorative and interpretive activities in JPP would require the use of ground clearing equipment. However, the Archeological Preservation Plan proposes the addition of clean fill in JPP to protect archeological sites. Additionally, the proposed multi-use fields, play areas, comfort station, perimeter barriers, parking areas and access roads have been located in areas that are either considered to have low archeological potential or that have been cleared for construction by previous archeological investigations (refer to the

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Geoarcheological Report that is available for inspection at the NPS and the WWB Replacement Project offices during normal business hours). For this reason, Alternative 3 would have an adverse, site-specific, short-term, minor impact on archeological sites during the construction due to the construction activities.

Alternative 3 proposes the rehabilitation and preservation of the Jones Point Lighthouse and D.C. South Cornerstone, including the rebuilding of the sea wall and the vault that protects the cornerstone. The rehabilitation and preservation work requires that NPS rebuild the existing wall and vault in addition to construction work at the Jones Point Lighthouse. For this reason, Alternative 3 would have an adverse, site-specific, short-term, minor impact on historic properties during the construction due to the demolition of the existing sea wall and vault and construction activities at the lighthouse.

Section 106 Summary: In accordance with Section 106 of the NHPA, the Alternative 3 would have No Adverse Effect on archeological resources and No Adverse Effect on historic structures within JPP. Alternative 3 would have No Adverse Effect on the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District.

Conclusion: The implementation of Alternative 3 would have a beneficial, local, long-term, major effect; however, an adverse, site-specific, short-term, minor impact on cultural resources would occur during the construction phase of the project due to the need to excavate portions of the site and construction activities.

Upon completion of the construction phase of the project, Alternative 3 would have a minor, long-term impact to archeological resources as no further ground-disturbing activities would occur and the exposure of one shipway from the VSC Site (44AX78) would not affect the NRHP-eligibility of this archeological site.

There would be a long-term, beneficial effect on historic properties, as compatible materials would be used for the rehabilitation and preservation of the lighthouse and the construction of the new sea wall in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The improved condition of the Jones Point Lighthouse and D.C. South Cornerstone would reduce the likelihood of continued damage to these resources over time.

Alternative 3 would result in no impairment of the park's cultural resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents. Alternative 3 would result in no impairment to the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District because changes would not be perceptible or would be barely perceptible to most visitors to each historic district.

Alternative 4 - Preferred Alternative (One multi-use field south of the WWB)

Analysis: The construction of one multi-use field south of the WWB, play areas, a park manager's office/comfort station, and perimeter barriers would require trenching the site for the foundations associated with the security elements. Construction of the parking area would require the grading and paving of a two areas connected by an access road. During construction of these various elements, heavy equipment and vehicles would need access across portions of JPP. The exposure of one of the shipways associated with the VSC Site (44AX78) as a part of planned commemorative and interpretive activities in JPP would also require the use of ground clearing equipment. However, the Archeological Preservation Plan proposes the introduction of clean fill in JPP to protect archeological sites. Additionally, the proposed multi-use field, play areas, comfort station, perimeter barriers, parking areas and access roads have been located in areas that are either considered to have low archeological potential or that have been cleared for construction by previous archeological investigations (refer to the Geoarcheological Report that is available for inspection at the NPS and the WWB Replacement Project offices during normal business hours).

Alternative 4 proposes the rehabilitation and preservation of the Jones Point Lighthouse and D.C. South Cornerstone, including the rebuilding of the sea wall and the vault that protects the cornerstone. The rehabilitation and preservation work requires that NPS rebuild the existing wall and vault in addition to construction work at the Jones Point Lighthouse. For this reason, Alternative 4 would have an adverse, site-specific, short-term, minor impact on historic and prehistoric resources during the construction due to the demolition of the existing sea wall and vault and construction activities at the lighthouse.

Section 106 Summary: In accordance with Section 106 of the NHPA, Alternative 4 would have No Adverse Effect on archeological resources and No Adverse Effect on historic structures within JPP. Alternative 4 would have No Adverse Effect on the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District.

Conclusion: The implementation of Alternative 4 would have a beneficial, local, long-term, major effect; however, an adverse, site-specific, short-term, minor impact on cultural resources would occur during the construction phase of the project due to the need to excavate portions of the site and construction activities.

Upon completion of the construction phase of the project, Alternative 4 would have a minor, long-term impact to archeological resources upon the completion of construction activities as no further ground-disturbing activities would occur and the exposure of one shipway from the VSC Site (44AX78) would not affect the NRHP-eligibility of this archeological site.

There would be a long-term, beneficial effect on historic properties, as compatible materials would be used for the rehabilitation and preservation of the lighthouse and the construction of the new sea wall in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The improved condition of the Jones Point Lighthouse and D.C. South Cornerstone would reduce the likelihood of continued damage to these resources over time.

Alternative 4 would result in no impairment of the park's cultural resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents. Alternative 4 would result in no impairment to the Alexandria National Historic Landmark Historic District or the Alexandria National Register Historic District because changes would not be perceptible or would be barely perceptible to most visitors to each historic district.

Mitigation Measures

All construction activities would be completed in accordance with the Archeological Treatment Plan for the site, avoiding construction activities, including staging, in areas determined to have high archeological potential. Clean fill would also be brought into JPP, as discussed in the Archeological Treatment Plan, and placed on top of archeological sites for long-term preservation.

All rehabilitation and preservation work at the Jones Point Lighthouse and D.C. South Cornerstone would be completed in accordance with the *Park Interpretation Plan* for the site, using compatible construction materials and completed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

The ROD contains a Table of Commitments that lists actions that would mitigate the potential impacts of the WWB Replacement Project as well as the JPP improvements. A copy of the ROD is available for inspection at the NPS and the WWB Replacement Project office. The ROD contains the following commitment relative to cultural resources: Follow the conceptual mitigation plan for the Alexandria Historic District/JPP/Jones Point Lighthouse and D.C. South Cornerstone.

The MOA for the WWB Replacement Project (which includes JPP) outlines specific mitigation measures for historic properties and archeological resources. As per the requirements included in the 1997 MOA, the FHWA must prepare and implement plans for the treatment, preservation and interpretation of the both the archeological resources and historic structures located within JPP. (These stipulations would prohibit the implementation of the No-Action Alternative). Coordination would continue with the SHPO and interested parties to complete the stipulations in the MOA with regard to cultural resources.

J. Utilities

Guiding Regulations and Policies

The National Environmental Policy Act (NEPA) of 1969, as amended, requires all agencies of the federal government to consider and document potential social, economic and environmental impacts of projects eligible for federal funding. The following federal laws and FHWA regulations contained in Title 23 of the United States Code deal specifically with utilities:

- 23 U.S.C. 109(l) covers the accommodation of utilities on the right-of-way of federal-aid highways.
- 23 U.S.C. 123 covers reimbursement for the relocation of utility facilities necessitated by the construction of a project on any federal-aid highway.

The FHWA and the American Association of State Highway Officials (AASHTO) have published several program guides and design criteria regarding utility issues.

Methodology and Assumptions

Existing utility systems and future system plans for all private and public utilities including communication, electric power, water, gas, oil, petroleum products, steam, sewer, drainage, and similar facilities affecting the public right-of-way for streets and highways were identified for the WWB Replacement Project. Review of utility plans and subjective observations were used to determine potential impacts to utilities introduced by the JPP improvements.

Impacts on Utilities

The following thresholds were used to determine the magnitude of effects on utilities:

Negligible: Utilities would not be affected.

Minor: Changes in utilities would be slight. May or may not require mitigation.

Moderate: Changes in utilities would be readily apparent. Would require mitigation.

Major: High level of adverse change such as utility conflicts that require excavations

and/or relocations.

The No-Action Alternative

The No-Action Alternative will have minor effects on existing utilities. Occasional tree trimming is required to keep the aerial paths for the lines clear. Utility companies may also need to perform maintenance on the cables.

Impacts Common to Action Alternatives

Analysis: The impact of the action alternatives on existing utilities would vary substantially based on the timing of project implementation. If the park access improvements are initiated prior to the demolition of the existing bridge and completion of the new WWB, estimated in 2008, then all of the services to the construction trailers and both electrical feeds to the new bridge would need to be maintained. That maintenance of service would require relocation of facilities that are in conflict with the proposed construction. The electrical service for the new bridges would lead off of Royal Street at the new abutment so they would not be impacted by any of the JPP action alternatives. If construction of the proposed park access improvements follows the demobilization of contractors from JPP, the only services that would need to be

maintained, and possibly relocated, would be electrical and phone service to the Jones Point Lighthouse and roadway lighting for Jones Point Park Drive.

Aside from the timing of project implementation, all action alternatives have the following impacts to existing utility facilities:

- Power lines and phone lines that run to the south end of Fairfax Street may need to be relocated due to the proximity of the new parking area and/or access road.
- Power lines and phone lines that currently run east from the intersection of Lee Street and Lee Court would need to be relocated to remove them from the easternmost multiuse field or parking area, as applicable.
- New utility lines for water, sewer, phone, and electricity would need to be placed under the new WWB to serve the proposed comfort station.

In addition to the above, Alternatives 2, 3, and 4 share the following impacts to existing utilities:

- Power lines and phone lines at the southeast corner of the community garden would need to be relocated due to the proximity of the new access roadway and parking area.
- Sanitary sewer lines at the intersection of the Lee Street right-of-way and the new access roadway may need to be adjusted due to proposed stormwater drainage construction.

Conclusion: The construction of the action alternatives would have an adverse, site-specific, short-term, major impact on selected utilities. The addition of new utility lines under the WWB for water, sewer, phone, and electricity would benefit the proposed comfort station. However, the action alternatives would result in no impairment of park natural, cultural, and recreational resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation Measures

Coordination and the active effort to share information and interact productively with others occur in all phases of the development of a project (planning, design, preliminary engineering, construction, operation, and maintenance). All parties with utility facilities in or abutting the park's right-of-way would have the opportunity to examine and consider the impact of the proposed project. Municipal agencies, utility companies, and the project team exchange information on planned utility/infrastructure projects on a continual basis. The project team would distribute design plans to all utility companies for review and comment. Public information programs would advise area residents and park patrons of the timeframe for construction activities. Notification would occur through press releases; notices on the NPS, City of Alexandria, and WWB Replacement Project websites; and posted signs at the park. The NPS would continue public involvement activities throughout planning and design activities.

K. Safety and Security

An integrated security design is a top priority for the NPS and would benefit both the public (in terms of aesthetics) and the agency (potential maintenance issues). The ultimate goal is to integrate security measures (perimeter barriers) into a consistent landscape that meets the approval of both the NPS and the public. Based on the current security measures implemented at other NPS properties, the access and parking to JPP would use a combination of perimeter barriers including decorative fencing, a "ha-ha" wall (depressed wall with slope), masonry piers, bollards (stationery and retractable), a guardhouse, and landscape plantings.

Guiding Regulations and Policies

In August 2003, the federal TSA performed a vulnerability assessment and recommended the removal of all public vehicle access and parking from beneath the new WWB. After careful evaluation of the risks of parking in JPP, a recommendation was set forth to eliminate parking and vehicular access in the park within an 80-foot distance measured from the north and south parapet driplines of the new WWB. There could be an exception for special events if the predefined perimeter barriers have been put in place for vehicle inspection assuring safety of the bridge structure.

TSA's recommendation, endorsed by the FHWA and accepted by the MSHA, the VDOT, the City of Alexandria, and the NPS has resulted in the need to assess the proposed parking, access, and security components of the park design.

Methodology and Assumptions

All of the action alternatives contain security measures including structures, materials, and equipment that are meant to deter criminal activity. Subjective observations were used to determine potential effects to public safety and security from the various perimeter barriers to be introduced by the JPP improvements.

Impacts on Safety and Security

The following thresholds were used to determine the magnitude of effects on utilities:

Negligible: The effect would be at low levels of detection and would not have an

appreciable effect on public safety or security.

Minor: The effect would be detectable, but would not have an appreciable effect on

public safety or security. If mitigation were needed, it would be relatively

simple and likely successful.

Moderate: The effects would be readily apparent and would result in substantial,

noticeable effects to public safety and security on a local scale. Mitigation

measures would probably be necessary and would likely be successful.

Major:

The effects would be readily apparent and would result in substantial, noticeable effects to public safety and security on a regional scale. Extensive mitigation measures would be needed, and their success would not be guaranteed.

The No-Action Alternative

The No-Action Alternative does not address TSA's security recommendation to remove all public vehicle access and parking under the WWB (an exception for special events was allowed if the predefined security measures have been put in place for vehicle inspection assuring safety of the bridge structure).

Impacts Common to Action Alternatives

Analysis: The perimeter barrier systems contained in each action alternative are designed to eliminate public vehicle access and parking under the WWB and to prevent a vehicle from entering within 80 feet of the bridge. The action alternatives have multiple parking and access configurations that provide up to 110 parking spaces (and up to 240 parking spaces for special events under Alternatives 2, 3 and 4). The action alternatives include a new park entrance road approximately 200 feet from the new WWB. Security requirements would limit access to both the bridge and the water. The area under the bridge would be available for special events, provided there is controlled access and/or a security and search checkpoint. A guardhouse would ensure that vehicles could be monitored entering and exiting the 80-foot distance surrounding the WWB.

All of the action alternatives would have effects during construction. Plans call for access to park facilities during construction of park improvements, as much as feasible, and the separation of construction areas with fences for the safety of park patrons. Temporary parking areas would be provided north of the WWB.

All of the recreational functions of the park, including walking trails, fishing, soccer, and access to the Jones Point Lighthouse and D.C. South Cornerstone can likely be maintained during construction. Some recreational activities, such as the soccer fields, may have to be temporarily relocated within the park in order to ensure the safety of park users at all times. The NPS is committed to maintaining access between the northern and southern portions of the park during the construction period. Contract specifications would direct the contractor to maintain a temporary pathway through the construction zone during hours the park is open to the public.

Construction of the park improvements would not involve any unusual or particularly dangerous construction methods, procedures, or locations that would pose any substantial safety or security effects. Public safety, involving design and engineering of the park improvements and the type of materials used, is addressed by state and local building codes and design standards used by the NPS in the development of its facilities.

Conclusion: All of the action alternatives include a perimeter barrier system that would have a beneficial, site-specific, long-term, moderate effect on public safety and security. However, the effects from construction activities would be short-term. The action alternatives would result in

no impairment of park natural, cultural, and recreational resources because there would be no major, adverse impacts to those resources whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation of JPP; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the 2001 JPP EA, or other relevant NPS planning documents.

Mitigation Measures

The challenge is to design the perimeter of JPP to meet both the security recommendations and provide an attractive landscape for park users. The proposed perimeter barrier system would incorporate the natural landscape with a permanent berm, preventing vehicles from entering within 80 feet of the WWB. If this is not possible based on geometrics and hydrology, the next choice of barrier could incorporate a series of planters and plinth or retaining walls. The last choice would incorporate a series of bollards or fence walls. The access point into the park from Royal Street would use a proposed series of bollards and a guardhouse that would be designed to be compatible with the existing park environment.

L. Indirect and Cumulative Effects

The WWB FSEIS contained a full secondary and cumulative effects analysis that encompassed the JPP project area. The CEQ regulations (40 CFR 1508.8(b) for implementing the NEPA describe secondary or indirect effects as: "...caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable." The CEQ regulations define cumulative effects as: "...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." (40 CFR 1580.7).

Hydrology

The NPS has received questions from the public regarding potential indirect effects on natural drainage patterns and stormwater flow. In particular, residents asked if the project would exacerbate natural hazard events (flooding) that could, in turn, threaten the surrounding residential areas and cultural resources. In response, the project conducted a study of surface hydrology. The study, entitled *Hydrologic and Hydraulic Analysis Report, Jones Point Park Drainage Study, Alexandria, Virginia* (Potomac Crossing Consultants, September 2005), is available for public inspection at the NPS and the WWB Replacement Project offices. The study found that half of the area in the northern portion of JPP flows directly to the Potomac River via swale or natural channel. The remainder flows under Lee Street via a 24-inch reinforced concrete pipe (RCP) pipe, discharges through a wetland to twin 21-inch corrugated metal pipes (CMP) that flow under the WWB, and discharges into Hunting Creek.

The public has expressed concern that a loss of vegetation would affect the hydrology in JPP. However, all of the action alternatives would have either the same amount of impervious area or less than existing conditions. There would be no cumulative loss of vegetation in the park.

Existing storm drain culverts within JPP are undersized. The 24-inch RCP culvert under Lee Street is too small to adequately convey the runoff. Stormwater runoff would flood the road at the 10-year storm event elevation, even if the culvert were properly maintained. The twin 21-inch CMP culvert under the bridge that leads to the south to the Potomac River is also undersized, and the outfall is in a constant submerged (tailwater) condition. Stormwater runoff would flood the road under the WWB if the culvert is not upgraded. Both culverts would fail to adequately accommodate stormwater during a 10-year storm event, even if the Potomac flooding impacts were not a factor.

All of the action alternatives would increase the stormwater runoff in the park as the drainage area to the culverts would be increased in size and contain more impervious area. However, the study based its analysis on Alternative 2 since it would add the most impervious area (thereby increasing stormwater flow the most). All of the other action alternatives would have less impact on stormwater flow. Existing culverts would be upgraded and a new culvert installed between the existing culverts, under the proposed road. Roads are flooded, under existing conditions, at the 10-year storm event elevations. Proposed flows would pass through the drainage system without flooding the road if the following improvements were made: the 24-inch pipe would be upgraded to a twin 24-inch concrete pipe; the twin 21-inch pipe would be upgraded to twin 2-foot-high by 6-foot-wide box culverts; and a new twin 36-inch culvert would be installed under the new road. These improvements would allow flows equal to and less than the 10-year storm event to drain without flooding any roads. However, storm events greater than the 10-year return frequency would continue to flood JPP due to Potomac River influences. Residences would not be affected by culvert influences; however, Potomac River flooding would continue to threaten residences. The proposed improvements to JPP would not increase Potomac River flooding.

The flooding solution chosen would not change the inverts of the pipes in the park, just make the pipes larger. Water would flow more quickly through the park, yet water below the pipe inverts would remain. Existing wetlands would continue to have the same water available under proposed conditions. Wetlands would not be affected by upgrading the culverts.

The action alternatives would have a beneficial, local, long-term, major effect on stormwater flow in JPP by expanding the capacity of the storm drainage system to handle stormwater runoff and reducing the potential flooding of roads. The proposed improvements to storm drain culverts would not impair park resources.

Cultural Resources

There would be a negligible indirect or cumulative impact to archeological resources as no ground-disturbing activities would occur.

Natural Resources

Cumulative impacts to tidal and/or nontidal wetlands and waterways, vegetation, terrestrial habitats, and wildlife are not expected to occur within the JPP area, as no further transportation, park, or other improvement plans are anticipated. The JPP project improvements would mitigate for the impacts as well as contain the spread of invasive porcelain berry vine which would benefit the park.

M. Sustainability and Long-Term Management

The NPS has adopted the concept of sustainable design as a guiding principle for facility planning and development. Director's Order 12 defines sustainable development as "that which meets the needs of the present without compromising the ability of future generations to meet their needs" (World Commission on Environment and Development).

The objectives of sustainability are to design park facilities to minimize adverse effects on natural and cultural values, to reflect their environmental setting, and to maintain and encourage biodiversity; to construct and retrofit facilities using energy-efficient materials and building techniques; to operate and maintain facilities to promote their sustainability; and to illustrate and promote conservation principles and practices through the sustainable design and ecologically sensitive use.

The action alternatives are consistent with NPS concepts on sustainability as the project would be implemented in a manner so as to minimize impacts to the natural and built environments. The materials and design of the perimeter barriers would reflect the environmental setting. All rehabilitation and preservation work at the Jones Point Lighthouse and D.C. South Cornerstone would be completed in accordance with the *Park Interpretation Plan* for the site, using compatible construction materials and completed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Any upgrades to the water, sewer, phone, and electrical systems would be accomplished using energy-efficient equipment, materials, and procedures.

Short-Term Effects vs. Long-Term Productivity

All of the action alternatives would have short-term effects from dust, noise, and excavation associated with construction activities. Access to the Mt. Vernon Trail would remain open to the public during construction of the JPP improvements. The recreation fields, fishing areas, and other park resources would remain open to the extent that they can maintain safe conditions during construction of the improvements. The project would develop comprehensive phasing and mitigation efforts to lessen the short-term effects. Notification of pending construction activities would occur through press releases; notices on the NPS, City of Alexandria, and WWB Replacement Project websites; and posted signs at the park. The NPS would continue public involvement activities throughout planning and design activities.

Long-term effects of the action alternatives include the loss of forest, understory vegetation, and wetlands, as described in other sections of this document. However, the action alternatives fulfill the Purpose and Need for the project (refer to Chapter 1.0 of this document), the NPS resource management goals for JPP (refer to Chapter 2.0 of this document), and conditions relevant to JPP as stated in the MOA and the ROD for the WWB Replacement Project (refer to the Appendix).

An extensive agency coordination and public involvement program, established during the *Woodrow Wilson Bridge Improvement Study*, was continued during planning activities for JPP. The public involvement activities included an interagency coordination group, citizens advisory committee, design review working group, technical coordination teams, website, open house, and other opportunities for participation. Although there are competing interests for improving JPP,

the action alternatives present a balanced program of active recreation, passive recreation, and interpretation of archeological, historic, cultural, and natural park features that would benefit local and regional park patrons.

Irreversible or Irretrievable Commitment of Resources

Irreversible impacts are those effects that cannot be changed over the long-term or are permanent. An irretrievable commitment of resources consists of the effects to resources that, once gone, cannot be replaced. The action alternatives involve the irreversible and irretrievable commitment of forested land (up to 5.6 acres), mature trees (up to six trees greater than 24 inch dbh), and wetlands (up to 0.5 acres) for the construction of recreational facilities. Fossil fuels, labor, and construction materials would be used to construct the action alternatives. The materials used in the construction process are irretrievable, however, they are not in short supply and their use should not have an adverse effect on continued availability of these resources. The commitment of these resources is established on the premise that local and regional park patrons would benefit from the proposed park improvements. Benefits would include increased safety and security, and expanded recreational opportunities within JPP.

Unavoidable Adverse Impacts

Unavoidable adverse impacts are those that cannot be fully mitigated or avoided and, therefore, would remain throughout the duration of the action. The following list describes potential unavoidable adverse impacts related to the action alternatives.

- The clearing of trees and understory vegetation would reduce the amount of habitat for forest and forest edge birds and other wildlife. However, impacts to wildlife are anticipated to be minimal and are not expected to result in the loss of species in the park.
- The addition of a new access road, parking areas, and multi-use fields would have visual effects. Bollards, if used as a perimeter barrier, would have a less natural appearance in the landscape than would dense plantings.
- The action alternatives increase the distance between the new parking area(s) to the new water access area (compared with existing conditions). This would require park visitors to transport water recreational gear for longer distances.

N. The Preferred and Environmentally Preferred Alternatives

The Preferred Alternative

Alternative 4 fulfills the objectives of the 2001 JPP EA, to enhance recreation opportunities in JPP and complies with the stated design goals in the MOA and ROD for the WWB Replacement Project. Construction of these improvements would provide recreational opportunities within JPP that currently do not exist and represent an improvement over the conditions that currently exist today under and around the WWB.

In particular, Alternative 4 fulfills the objectives of the 2001 JPP EA and the federal TSA's security recommendations by:

- Creating multi-use fields or improving existing multi-use field and tot lot.
- Creating new bike and footpaths in the southern portion of the park.
- Removing (existing) parking from under the WWB.

The Preferred Alternative minimizes impacts to resources (i.e.: forest cover and wetlands – through mitigation) and improves drainage conditions. Proposed drainage improvements consist of upgrading existing culverts and a new culvert installed between the existing culverts, under the proposed access road. The Preferred Alternative would increase the stormwater runoff in the park as the drainage area to the culverts would be increased in size and contain more impervious area. However, the drainage improvements would expand the capacity of the storm drainage system to handle stormwater runoff and reduce the potential flooding of roads.

The NPS recognizes the need to perform the improvements in JPP. This document acknowledges the issues highlighted through citizen comments and supports the proposed action to minimize, as much as possible, the potential effects of improvements to JPP. Though both supporting and dissenting comments were received, the Preferred Alternative considers all of the comments and serves as a compromise that provides a balance between them.

The Environmentally Preferred Alternative

The NPS is required to identify the "environmentally preferred alternative" in accordance with NPS Director's Order 12 (2001). The environmentally preferred alternative is determined by applying the criteria suggested in National Environmental Policy Act of 1969, which is guided by the CEQ. The CEQ provides direction that "[t]he environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in Section 101 of the National Environmental Policy Act, which considers:

- A. Fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations.
- B. Assuring for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings.
- C. Attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.
- D. Preserving important historic, cultural, and natural aspects of our national heritage and maintaining, whenever possible, an environment that supports diversity and variety of individual choice.
- E. Achieving a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities.
- F. Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources (National Environmental Policy Act, Section 101)."

Alternative 4 is the environmentally preferred alternative based on its protection of environmental and cultural resources, widest range of beneficial uses without degradation, and benefits to visitor use and experience.

The No-Action Alternative fails to meet criteria C and D, listed above. In particular, the No-Action Alternative would not have the greatest beneficial uses without risk of health and safety (criterion C) as it does not address the recommendations contained in the *Vulnerability Reduction Design Considerations for the Woodrow Wilson Bridge Replacement Project* (June 2002). Further, the implementation of the No-Action Alternative would fail to preserve the Jones Point Lighthouse and D.C. South Cornerstone, leading to the continued deterioration of these resources due to water damage from the Potomac River and heavy rains (criterion D). As previously stated, the No-Action Alternative is not being considered for improvements to JPP (refer to Chapter 3.0, Section A).

The action alternatives fulfill all of the criteria listed above. In particular, the action alternatives address the recommendations contained in the *Vulnerability Reduction Design Considerations* for the Woodrow Wilson Bridge Replacement Project (June 2002). The differences between the action alternatives appear in the amount of impacts to wetlands, forests/vegetation, and community gardens, and provision of multi-use fields and water access.

6.0 COORDINATION AND PREPARERS

A. History of Public Involvement

An extensive agency coordination and public involvement program, established during the WWB Replacement Project was continued during planning activities for JPP. The design phase of the WWB Replacement Project included the establishment of several teams and working groups comprised of agency representatives, technical experts and citizens to continue the refinement of the WWB design that was selected during the planning phase of the project. The following teams were put in place for technical and agency support:

- The Interagency Coordination Group (ICG) represents 25 regulatory and resource agencies that reviewed the project-wide permit requirements, avoidance and minimization alternatives, and mitigation alternatives and proposals. The ICG continues to monitor adherence to the permits and monitors the design, viability and success of the mitigation. In this capacity, they have provided comments for the appropriate impact mitigation for JPP, as well as other aspects of the WWB Replacement Project.
- The MOA stipulated the formation of the Design Review Working Group (DRWG). The technical experience of this group allows for discussion of Section 106 coordination, review of design documents and confirms compliance with the MOA. They also served as the Historic Advisory Committee during the WWB Design Competition conducted in 1998. They have provided guidance on interim and ultimate

- plans for the enhancements in JPP as well as other aspects of the WWB Replacement Project.
- The Environmental Management Group (EMG) comprises environmental managers from the Sponsoring Agencies and the USCOE, provides input, expertise, and policy direction for environmental issues including types of mitigation and treatment.
- The Virginia Technical Coordination Team (VATCT), comprised of FHWA, VDOT, Fairfax County and City of Alexandria engineering staff, provides design direction for Virginia improvements and receives information about JPP.

The following public involvement and outreach activities have been underway during the planning processes for the WWB Replacement Project and the JPP improvements:

- Two offices were established with scheduled weekly public hours and other opportunities for the pubic to reach the technical staff by appointment. The offices offer a resource of graphic and report documentation and staff to answer questions. One of these offices is located in Alexandria.
- Citizen Advisory Committee for the 1998 WWB Design Competition, which included
 members of the local community, participated in the selection of a design concept for
 the new WWB. This particular Committee was interested in the bridge aesthetics and
 views from within JPP, including the Operator's Tower location.
- The establishment of four Stakeholder Participation Panels, one of which focused on JPP issues. Field visits were held and attendance and participation of the panel members was consistent. The members of the Stakeholder Participation Panel requested that they remain involved, on an as-needed basis, throughout subsequent phases of the project.
- Open Houses conducted in June and November 1998 and June and December 1999.
- "Fast Facts" summarizing key issues of the project, specific resource papers such as cultural resources in JPP and Freedmen's Cemetery as well as quarterly issues of the Connections newsletters and many pro-active media placements.
- A project website (www.wilsonbridge.com) that debuted in November 1998, as part of the planning process is regularly updated and includes notice of public meetings.

The Alexandria City Council has held many meetings, open to the public, during which the JPP improvements were discussed through their development. For instance, the City Council reviewed and endorsed the 30% design drawings for JPP and the Urban Deck at a City staff presentation of the park and deck plans during a work session on February 20, 1999.

The Mayor, staff, and the Chair of the Park and Recreation Commission presented the 30% design on the Mayor's monthly cable television show on March 8, 1999 and the plans were presented to a number of City Boards and Commissions.

Presentations on the current plans for JPP and the Urban Deck were made to members of City Boards and Commissions (August 14, 2000) and to approximately 120 people at a public informational meeting held on September 6, 2000. A City Council Public Hearing was

conducted on November 18, 2000. The Council discussed the topic during the December 8, 2000 City Council Meeting at which time the interim plan for JPP was approved with modifications of retention of a forested area. The Council conducted a City Council Public Hearing on December 16, 2001.

Joint Public Hearings on the Draft SEIS and Joint Permit Application were held February 8 and 10, 2000. The Joint Public Hearings were held to afford interested parties the opportunity to review project information and to present their views regarding the information contained in the Draft SEIS. This information focused on the geometric refinements of conceptual mitigation plans, as well as current status of the JPP conceptual interim and ultimate improvements. Cultural resource findings, threatened and endangered species findings and other concerns of the refinements to WWB Alternative 4A were described at this time as Current Design Alternative 4A. Public and private oral testimony was recorded and transcribed. In addition, written comments were received, both at the Joint Public Hearing and during a comment period. Following the Joint Public Hearing and the receipt of public comments on the Draft SEIS, sponsoring agencies assessed the comments and directed revisions to complete the FSEIS in April 2000.

During December 2000, the City of Alexandria established a Neighborhood Task Force for the WWB Replacement Project. The Neighborhood Task Force is comprised of 10 members, two of whom are City Council members. A WWB Replacement Project representative is a liaison to the Task Force.

On June 27, 2005, the City of Alexandria held a public hearing on the design concepts under consideration for the JPP improvements. The City Council voted to recommend "Scheme A" to the NPS for consideration (this EA identifies the Council's recommendations as Alternative 1). The Council's Scheme A featured two 110 x 60 yard multi-use athletic fields north of the WWB, one oriented in an east-west direction and the other oriented north-south, and provision of 110 parking spaces between Royal and Lee Streets. The Council also specified that appropriate tree buffers should be provided to mitigate the impact on adjoining neighborhoods.

This EA will be circulated for public and agency review with a comment period of 60 days. The EA will be available for review at area public libraries and on the NPS website. The website address is http://parkplanning.nps.gov/gwmp. You may fill out a comment form online during the public comment period. Refer to the cover letter at the front of this document for the list of libraries and the dates for public circulation and receipt of comments.

The NPS will consider the public and agency comments prior to determining the final decision document that would be sent to the National Capital Region Director for approval and signature. Responses to comments would be incorporated in the Final EA and a Finding of No Significant Impact (FONSI) issued. The elements of the FONSI would then be included in the final design. The NPS will continue coordination with the Virginia SHPO pursuant to Section 106 of the NHPA and other interested parties, as appropriate. Interested parties and the general public will be offered continuing opportunities to comment during the planning and design for the project.

B. Summary of Public Input in the Planning Process

Public Involvement Activities

Table 2 lists the opportunities for public input in the planning process. The planning process included the JPP Stakeholder Participation Panel's recommendation to the City and the NPS for parking and access concepts to be presented in the EA. At the same time, the City of Alexandria's Neighborhood Task Force for the WWB Replacement Project and the Yates Gardens Civic Association considered the concepts and provided their own recommendations to the City and NPS. The action alternatives that are assessed in this EA reflect the recommendations by these three groups. In July 2005, the Alexandria City Council held a public hearing and voted to support an action alternative that accommodates two multi-use fields on the north side of the WWB and 110 parking spaces between Royal Street and Lee Street.

TABLE 2
PUBLIC INPUT IN THE JPP PLANNING PROCESS

Public Involvement Activity	Date	Purpose/Issues
Stakeholder Participation Panel Meeting	December 1998	JPP project introduction.
Stakeholder Participation Panel Meeting	May 1999	Recommended location of multi-use fields, hard surface areas, and pathways.
City of Alexandria Board and Commission Meetings	August 2000	Presentation of conceptual mitigation plan.
City of Alexandria City Council Public Hearing	November 2000	Presentation of JPP concepts as approved by the SPP.
2001 EA Public Comment Period	January – February 2002	2001 EA available for public inspection and comment
Joint Meeting of the SPP and the City of Alexandria Neighborhood Task Force (NTF)	June 2004	Presentation of JPP parking and access concepts.
Stakeholder Participation Panel Meeting	September 2004	Presentation of revised JPP parking alternatives
Yates Gardens Civic Association Meeting	October 2004	Present current alternatives and obtain comments.
City of Alexandria Public Hearing and Vote	June 2005	City of Alexandria obtained public comment on proposed concepts and voted to support an action alternative that accommodates two multi-use fields on the north side of the WWB and 110 parking spaces between Royal and Lee Streets.
Citizens for a Historical and Natural Jones Point Park (CHNJP)	September 2005	Present current alternatives, clarify NEPA process and NPS Management Policies, and obtain comments.
Open House	October 2005	Present the current alternatives under consideration for improvements to JPP in an informal, open house setting.
Public Hearing	September 2006	Provide a formal opportunity for public comment on the project.

Written Comments on the 2001 JPP EA

The 2001 JPP EA was circulated for public comment between January 11, 2002 and February 11, 2002. The NPS received two written comments: (a) from the City of Alexandria Transportation and Environmental Services Division and (b) from Leslie Jones, resident. The City of Alexandria (letter, dated February 8, 2002) suggested editorial revisions and corrections. Leslie Jones (letter, dated February 11, 2002) expressed her concern regarding active versus passive recreation opportunities in JPP and noted her sightings of beaver along the shore of the Potomac River. This EA reflects the editorial suggestions and addresses the comments contained in this correspondence.

Written Comments Received During Subsequent Planning Activities

The NPS has received written comments from citizens during the planning activities for JPP. Some comments objected to removing trees to accommodate a multi-use field on the north side of the bridge. Other comments asked about the potential effects on the archeological and historical character of JPP and other cultural resources such as the Alexandria Historic District and the VSC. Still other comments remarked on the potential loss of trees, wetlands, and floodplains, and the effect on natural water flow. Others identified potential neighborhood impacts from visual, noise, traffic and parking as concerns. Copies of the written correspondence are available for inspection at the NPS and at the WWB Replacement Project offices during normal business hours.

The NPS held an open house on October 15, 2005 to present information on JPP improvements. The NPS received approximately 200 written comments from citizens. The written correspondence encompassed the following major topics: environmental issues (tree removal and flooding); community issues (parking, traffic, and safety on Royal Street); location of recreational fields; protection of cultural resources; and environmental documentation issues. Copies of the written correspondence are available for inspection at the NPS and the WWB Replacement Project offices during normal business hours. The following lists the number of comments received by topic:

Alternative 1: 15 comments

• Alternative 4: 14 comments

• Environment: 32 comments

(tree removal = 13, flooding = 9, "other" = 8, general = 2)

No development

(no parking/no fields): 22 comments

• EIS (should be done): 17 comments

Historic Resources: 5 comments

• St. Mary's Elementary School (parking on S. Royal Street, safety, traffic): 133 comments.

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7.0 REFERENCES

A. Bibliography

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(no appointment necessary) (no appointment necessary)

Alexandria City Council. (Adopted) February 9, 1999. Resolution No. 1908.

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B. Glossary

Below is a selection of the terms, definitions and acronyms believed to be of most use to the readers of the JPP EA.

- Alternatives: For purposes of this EA, two or more reasonable options for addressing park improvements.
- Baseline Conditions: Existing conditions from which the environmental effects (wetlands, vegetation, etc.) are measured.
- Conceptual Engineering/Plan: The level of design at which the basic characteristics of each alternative are defined, including location of proposed facilities, dimensions, and general capital, operating and maintenance costs.
- **Development Concept Plan:** An overall plan stating public policy intentions and official guidelines for the future development of a public park, including the general location and character of development.
- Effect/Impact: For purposes of this EA, refers to a measurable change precipitated by the proposed park improvements.
- Environmental Assessment (EA): A document prepared for an action where the significance of the environmental impact is minimal or is not clearly established. The National Environmental Policy Act of 1969 requires an EA.
- Environmentally Preferred Alternative: The Council on Environmental Quality (CEQ) provides direction that "[t]he environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in Section 101 of the National Environmental Policy Act..."
- Federal Highway Administration (FHWA): A component of the U.S. Department of Transportation, established to oversee the development of a national road and highway

- system. The FHWA assists states in constructing highways and roads and provides financial aid at the local level.
- Finding of No Significant Impact (FONSI): A document which briefly presents why an action does not have a significant impact. It must include/reference the Environmental Assessment.
- Jones Point Park (JPP): An approximately 65-acre park located in the southeastern corner of the City of Alexandria that is owned by the NPS under the jurisdiction of the George Washington Memorial Parkway.
- Memorandum of Agreement (MOA): In the event of a finding of adverse effect on cultural resources determined to be on or eligible for the National Register of Historic Places (NRHP), consultation is initiated among the agency sponsoring a proposed action, the State Historic Preservation Office (SHPO) and other concerned parties, as appropriate, that results in a MOA concerning measures to mitigate the adverse effect.
- Mitigation Measures: Steps taken to moderate or reduce the adverse effects of constructing or operating the park improvements.
- National Environmental Policy Act (NEPA) of 1969: A comprehensive law requiring an analysis of the environmental effects of federal or federally-assisted actions and projects that affect the quality of the human environment.
- National Historic Preservation Act (NHPA) of 1966: The nation's primary historic preservation law (16 U.S. C. 470). The Act was designed to bolster the preservation and wise use of our historic resources, and set forth the policy of the federal government regarding historic preservation, encouraging conditions in which historic properties can be preserved in harmony with modern society while fulfilling modern society's needs. The Act created 1) the National Register of Historic Places (NRHP); 2) a system of State Historic Preservation Officers (SHPOs) who administer the national historic preservation program at the state level; 3) a program of matching grants-in-aid through which the National Park Service assists SHPOs in carrying out their work; 4) the Advisory Council on Historic Preservation, an independent federal agency responsible for advising the President and Congress on historic preservation matters, as well as commenting on federal agency actions under Section 106 of the Act that may affect historic properties; and 5) federal agency responsibilities for the identification, nomination, and stewardship of historic properties under Section 110 of the Act.
- National Park Service (NPS): A component of the U.S. Department of the Interior established to oversee the acquisition, planning, and/or maintenance of parks and recreational lands owned by the United States of America.
- National Register of Historic Places (NRHP): The nation's official list of cultural resources worthy of preservation. Authorized under the NHPA of 1966, the NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect our historic and archeological resources. Properties listed in the NRHP include districts, sites, buildings, structures, and objects that are significant in

- American history, architecture, archeology, engineering, and cultures. The U.S. Department of the Interior administers the NRHP.
- **Preferred Alternative:** A single alternative chosen from a set of several alternatives that is believed to best address recreational, security, and other goals established for the project.
- Record of Decision (ROD): A document prepared by the Division Office of the Federal Highway Administration that presents the basis for selecting a specific transportation proposal that has been evaluated through the various environmental and engineering studies of the Transportation Project Development Process. Typically, the ROD identifies that alternative selected in the Final Environmental Impact Statement (FEIS), the alternatives considered, measures to minimize harm, monitoring or enforcement programs, and itemized mitigation commitments.
- Section 4(f): Refers to Section 4(f) of the U.S. Department of Transportation Act of 1966, which permits the Secretary of Transportation to approve a project that requires the use of publicly-owned land from a park, recreation area, or wildlife refuge, or any land from a historic site of national, state or local significance only if the following determinations have been made: "there is no feasible and prudent alternative to the use of such land, and all possible planning has been undertaken to minimize harm to the 4(f) lands resulting from such use."
- **Section 106:** Refers to Section 106 of the National Historic Preservation Act of 1966 that requires federal agencies to consider the potential effects of proposed federal actions on any historic, architectural or archeological resources listed, or eligible for listing, in the National Register of Historic Places (NRHP).
- Wetlands: Wetlands are areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas. Wetlands are broadly classified according to where they are located. The major classifications are marine (oceanic), estuarine (tidal), riverine (river), lacustrine (lake), and palustrine (marsh).
- Woodrow Wilson Bridge (WWB): The existing WWB is a 6-lane bridge that crosses the Potomac River and connects Maryland and Virginia. A portion of the WWB travels through JPP. The WWB Replacement Project, currently under construction, includes a new 12-lane bridge, improvements to four intersections, pedestrian and bicycle facilities, safety barriers, lighting, and signage that will connect parks and trails on both sides of the Potomac River.

8.0 APPENDICES

- A. JPP EA Distribution List
- B. Birds and Other Wildlife Observed In Or Flying Over JPP
- C. NPS Responses to City of Alexandria's "List of Conditions" for Alternative 1
- D. Wetland Statement of Findings
- E. Record of Decision (Excerpts Relevant to JPP)
- F. Memorandum of Agreement
- G. Settlement Agreement Between the City of Alexandria and the U.S. Department of Transportation
- H. Agency Coorespondence