FINDING OF NO SIGNIFICANT IMPACT
For
MOUNT VERNON CIRCLE PARKING AND TRAIL IMPROVEMENTS

-ENVIRONMENTAL ASSESSMENT-

GEORGE WASHINGTON MEMORIAL PARKWAY
Virginia and Washington, DC

BACKGROUND
George Washington's Mount Vernon Estate and Gardens (Mount Vernon) is located in southeastern Fairfax County, Virginia, along the Potomac River. The property surrounding Mount Vernon is owned in part by the Mount Vernon Ladies' Association (MVLA), and in part by the Federal Government, managed by the National Park Service (NPS). In general, Mount Vernon owns the land south of the wall along Route 235 West, as well as the forested area between Route 235 North and Route 235 West. The George Washington Memorial Parkway (GWMP), a unit of the NPS, begins south of the Mount Vernon Traffic Circle ("the circle"). The land on both sides of the parkway is owned in part by the MVLA and NPS. The Mount Vernon Trail, a multi-use trail maintained by the NPS, begins in the East Parking Lot for Mount Vernon. Virginia Route 235 enters the study area from the west and turns to the north just west of the circle.

The western edge of the study area extends to just west of Old Mount Vernon Road while the eastern edge of the study area reaches almost to Little Hunting Creek. The southern edge of the study area is located just south of the circle, while the northern edge of the study area is located just north of Surrey Drive in the Mount Vernon Estate subdivision.

Currently, three parking lots accommodate automobile and RV traffic to Mount Vernon. All parking facilities are administered and maintained by the GWMP. During peak visitation in the spring, summer, and fall, the NPS has allowed vehicle parking in the circle to accommodate overflow. Tour bus parking is located along the southern edge of Route 235 beginning where the highway turns north and extends approximately 1,450 feet west of the circle.

The purpose of this project is to provide improvements (including parking, roadway, sidewalks, and multi-use trails) to accommodate current and planned demand for parking, to improve traffic operations, and to enhance the safety of pedestrians, motorists, and cyclists in the vicinity of Mount Vernon. To accommodate the current and planned future facilities at Mount Vernon, remove parking from the circle, and enhance pedestrian, motorist, and cyclist safety in the vicinity of Mount Vernon, additional improvements are necessary. Project need is based on several cumulative factors, including:

- Analysis of existing conditions shows that a deficiency currently exists for parking during periods of peak visitation
- At certain times, pedestrians must cross congested roads to access Mount Vernon from the existing parking areas
- Recent and planned expansion and renovations to the Mount Vernon Estate and Gardens will lead to changes in visitor and pedestrian patterns, including increases in parking demand
- Frequent use of circle as an overflow parking lot impacts the cultural landscape of Mount Vernon and the GWMP

- No multi-use path exists around the circle to separate through trail users from users wishing to tour Mount Vernon

PREFERRED ALTERNATIVE

The preferred alternative proposes to expand parking facilities and improve trail resources.

Preferred Build Parking Alternative

The Preferred Parking Alternative would provide 150 additional parking spaces in the expanded West Parking Lot and an additional 140-space overflow parking lot behind the wall on Mount Vernon property west of Route 235. The Preferred Parking Alternative is shown on the attached site plan. Although the proposed Preferred Parking Alternative will accommodate visitors a majority of the time, remote parking with shuttles will continue to be used on the days with significantly higher visitation, such as George Washington's birthday. During the June 16, 2004 meeting between the Federal Highway Administration (FHWA), NPS, Mount Vernon, and the Stakeholders Participation Panel (SPP), it was agreed that the proposed Preferred Parking Alternative would meet the project purpose and need and addresses community concerns while minimizing the impacts on natural and cultural resources. The parking lots are proposed to be built in two phases. The West Lot expansion will be constructed first in order to alleviate parking on the circle. The overflow lot behind the wall will be constructed when necessary, to be determined by MVLA.

Preferred Trail Improvement Alternative

The Preferred Trail Alternative is also shown on the attached site plan. The Preferred Trail Alternative provides a new multi-use trail beginning at the south end of the existing Mount Vernon Trail on the north end of the existing East Parking Lot, and connects with the Potomac Heritage National Scenic Trail on the north side of the Mount Vernon Memorial Highway. The trail section along the circle will be paved, with a highly-textured surface to force cyclists to walk their bikes on this portion of the trail. In addition, the crosswalks across the circle and Route 235 will be textured and rehabilitated. Signs will be installed on both ends of the circle advising cyclists to walk their bikes. Additional intelligent crosswalk technologies that enhance pedestrian and bicyclist detection also may be employed at this intersection to improve pedestrian and bicyclist safety.

ALTERNATIVES CONSIDERED

Parking Alternatives

Based on an understanding of the Mount Vernon area and findings of earlier studies, several principles guided the definition of potential improvements. The alternatives recommended at the public meetings were also included in the analysis. A full range of alternatives were developed within the following specific goals and objectives of this project:

- Increase parking capacity for visitors
- Improve pedestrian and bike trail connectivity
- Enhance pedestrian, motorist, and cyclist safety
- Provide for extensive opportunities for public involvement
- Meet NPS Management Plan goals for the GWMP
- Make best use of resources
- Preserve significant resources

Many of the preliminary concepts came from previous studies and/or as a result of the coordination with the SPP, federal and state agencies, and local jurisdictions. Factors considered in the development of the alternatives included the number of spaces needed, traffic operations and safety, and environment and community concerns.

A range of alternatives was suggested to meet the project purpose and need. All alternatives that were proposed during the conceptual stage as well as those recommended later in meetings with the SPP, public, and agency representatives were considered. As a result of the alternative screening and refinement, several of the original concepts were eliminated from detailed analysis.

The concepts considered and eliminated because they did not meet purpose and need included shuttle bus service, Metro rail extension, and parking demand management. The concepts considered and eliminated because of agency concerns and community included parking structures and alternatives with realignment of Route 235 North. The concepts considered and eliminated because of resource impacts or because they were not consistent with management goals of NPS or the MVLA included parking expansion only on NPS property or only on Mount Vernon property behind the wall.

After the initial analysis of the preliminary concepts, the build concepts were refined. In addition, a No Action Alternative was retained to serve as the baseline against which all other alternatives were compared. The No Action Alternative provided no additional parking spaces or improvements to pedestrian, motorist, or cyclist safety and therefore does not meet the project purpose and need. The preliminary build alternatives that were retained for further evaluation included:

- New Parking Lot on Mount Vernon property west of Route 235: This alternative provided a single additional parking lot on Mount Vernon property west of existing Route 235 North, with access onto both Routes 235 North and West. After further evaluation, this alternative was eliminated due to community and safety concerns with an access on Route 235 North.
- Expand East and West Parking Lots: The alternative added approximately 260 spaces to the West Parking Lot and 30 spaces to the East Parking Lot. Visitors would access the parking lot expansions through existing driveways. After further evaluation, this alternative was eliminated because of impact to NPS resources.
- Expand West Parking Lot and expand employee parking lot behind the wall on Mount Vernon property for overflow parking: The proposed alternative expanded the existing West Parking Lot with 150 spaces and provide an additional 140 overflow parking spaces in the employee parking lot behind the wall. After further evaluation, this alternative was eliminated because the mix of visitor and employee parking in one lot would pose security and management concerns for Mount Vernon.
- Expand West Parking Lot and construct overflow parking lot behind the wall on Mount Vernon property west of Route 235: This alternative expanded the West Parking Lot by 150 spaces and construct an overflow parking lot on Mount Vernon property behind the wall to accommodate 140 spaces. The overflow lot would be located in the west fields of Mount Vernon Estate, with a new driveway onto Route 235 West. This alternative was selected as the Preferred Alternative. The Preferred Alternative described in the Environmental Assessment included an expansion of the West Lot to the north of the existing parking lot. Following the January 29, 2004 public meeting and further discussion with NPS and FHWA, the location of the West Lot expansion was shifted to the west of the existing parking lot. This location preserves a greater number of old-growth trees on NPS land and does not have any negative impacts compared with the design presented in the EA. The final design is shown in the attached site plan.

Trail Alternatives

In addition to new parking, this project also includes a proposal to connect Potomac Heritage National Scenic Trail (also Interstate Route 1 Bikeway) along Mount Vernon Memorial Highway (Route 235 West)

with the Mount Vernon Trail. The new trail connection begins at the north end of the East Parking Lot and joins with the existing trail on the west side of the circle. In addition to a No Action Alternative, the following preliminary trail alternatives were considered:

- Alternative A: This alternative crossed over the GWMP with a bridge north of the circle and connects with the existing Mount Vernon Trail generally west of the post office.
- Alternative B: Alternative B extended the existing trail generally east of the East Parking Lot along the existing brick wall and joined the existing sidewalk on the south side of the Mount Vernon Memorial Highway.
- Alternative C: This alternative crossed the GWMP with a bridge north of the circle as in Alternative A, and then carries along the north side of the West Parking Lot to connect with the existing trail at the intersection of Route 235 North and Route 235 West.

Alternatives A and C were found to have significant impacts on GWMP. The community also had many concerns with those two alternatives. Therefore, Alternatives A and C were dropped from further consideration. Alternative B was modified to develop two additional alternatives:

- Alternative B1: This alternative extended the trail between the GWMP Parkway and the East Parking Lot, and ran along the inside of the circle.
- Alternative B2: The modified alternative ran along the wall east of the East Parking Lot and crosses over to the inside of the circle at the south end of the East Parking Lot as in Alternative B1. This alternative was not selected because of the impact to vegetation between the parking lot and the wall.
- Alternative B1 Modified: Following further evaluation of Alternative B1 for pedestrian, cyclist, and automobile conflicts, a modified Alternative B1 was developed as the Preferred Alternative. This alignment remained along the outside of the circle. This alignment is anticipated to have minimum safety concerns and separates pedestrians and cyclists from the vehicular traffic.

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

The proposed resource protection measures described in the EA are adopted. Although the Preferred Alternatives would have short and long-term impacts on natural and cultural resources, they would be minimized and mitigated as described in the EA. No impairment of the NPS resource would result. A summary of environmental consequences follows.

Definitions

1. *Temporary impacts* – Impacts anticipated occurring during construction only. Upon completion of the construction activities, conditions are likely to return to those that existed prior to construction.
2. *Short-term Impacts* – Impacts that may extend past the construction period, but are not anticipated lasting more than a couple years.
3. *Long-term impacts* – Impacts that may extend past the construction period, and are anticipated lasting more than a couple years.
4. *Negligible* – Little or no impact (not measurable).
5. *Minor* – Changes or disruptions may occur, but does not result in a substantial resource impact.
6. *Major* – Easily defined and measurable. Results in a substantial resource impact.
7. *Impairment* – An impact that would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values.

General Environmental Setting

Natural Resources and Physical Environment

The impact of the Preferred Parking and Preferred Trail Alternatives were analyzed for a wide array of environmental conditions. It was concluded that neither Preferred Alternative would impact the following categories: wetlands, air quality, floodplains and floodways, hazardous materials and waste, energy, land use and community facilities, Section 6(f), and environmental justice. Impacts on the remaining categories studied are described below.

Vegetation

Approximately 77 trees over 6 inches in diameter on 1.3 forested acres on NPS property, two trees over 6 inches in diameter adjacent to the road, and 21 trees on 2.1 acres of maintained grassy land on Mount Vernon property will be impacted by the Preferred Parking Alternative. Approximately 28 trees on 0.2 acres of forested land would be impacted by the Preferred Trail Alternative. The placement and design of the parking lot was intended to minimize the impacts to trees. The design incorporates the use of islands to allow for the replanting of trees within the parking lot.

Wildlife

Some impacts to wildlife resources are anticipated under the Preferred Parking and Preferred Trail Alternatives, due to the impacted 1.5 acres of forested land. Due to the fragmented nature of the land by existing roads, parking lots, and development, the land to be used for the Preferred Parking and Preferred Trail Alternatives is not considered of high habitat value and therefore impacts will be minimal.

Threatened and Endangered Species

To determine the potential for threatened or endangered species to exist within the study area, the Virginia Department of Game and Inland Fisheries (VDGIF), Virginia Fish and Wildlife Information Service and the U.S. Fish and Wildlife Service (FWS) were consulted for threatened and endangered animal species. The Virginia Department of Conservation and Recreation's Division of Natural Heritage (DCR) was consulted for threatened and endangered plant and insect species. Based on a letter received from the VDGIF dated June 24, 2002, only the federal and state threatened bald eagle (Haliaeetus leucocephalus) has been documented in the project area. According a letter received by the FWS, "it appears that this project is not likely to adversely affect any federally listed or proposed species or their designated critical habitat."

The DCR search was site-specific to the study area, and searched for natural heritage resources in the project area. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations. From a letter received from the DCR dated June 7, 2002, the presence of natural heritage resources was documented, but "due to the scope of the activity and the distance to the resources, we do not anticipate that this project will adversely impact these natural heritage resources." In addition, the letter stated that "the current activity will not affect any documented state-listed plants or insects," and that their files "do not indicate the presence of any State Natural Area Preserves under DCR's jurisdiction in the project vicinity."

No impacts on threatened and endangered species would occur under the Preferred Parking and Preferred Trail Alternatives, as stated by the DCR, FWS, and VDGIF.

Water Resources and Quality

The study area is adjacent to two streams. Dogue Creek is located west of the study area and Little Hunting Creek is located east of the study area. Both streams flow into the Potomac River. The study area is located within both the Dogue Creek watershed and the Little Hunting Creek watershed. These watersheds drain into the Lower Potomac River subbasin. This subbasin drains into the Potomac and Shenandoah River Basin, which in turn drains into the Chesapeake Bay.

Coastal Zone Management
The Virginia Coastal Resources Management Program was established in 1986 to protect and manage an area known as Virginia's "Coastal Zone." This zone encompasses 29 counties (including Fairfax County), 15 cities, and 43 towns in Tidewater Virginia and all of the waters therein and out to the 3-mile Territorial Sea boundary. The tidal portion of the river extends from the mouth of the Chesapeake Bay to Chain Bridge in Washington, D.C. As such, the general study area is within the Virginia Coastal Zone. Construction and other activities related to the implementation of the proposed safety improvements would comply with local stormwater management, sedimentation and erosion control and other water quality protection regulations.

Chesapeake Bay Preservation Area
Fairfax County is responsible for delineating the Chesapeake Bay Preservation Act areas (CBPAs) and adopting programs that implement the performance specified in the language of the Chesapeake Bay Preservation Act. The NPS is a member of the Chesapeake Bay Program which also helps implement the act. The CBPAs are divided into two designations by the Commonwealth of Virginia's regulations. These areas are resource protection areas (RPAs) and resource management areas (RMAs). The majority of the study area is an RMA, in which there are no restrictions to building parking lots or paved trails.

The water quality impacts associated with the proposed Preferred Parking Alternative would be mitigated with the proposed stormwater system. Impacts from the Preferred Trail Alternative would be minimal, and are not anticipated to require mitigation beyond proposed vegetation.

Physiography, Geology, and Soils
The Preferred Parking Alternative would require the clearing of 1.3 acres of forested land on NPS property and 2.1 acres of maintained grassy land on Mount Vernon property. The Preferred Trail Alternative would require the clearing of 0.2 acres of forested land. Construction activities would incorporate re-vegetation. The Preferred Parking Alternative will result in the protection of the circle.

Noise
No long-term noise impacts would occur under the Preferred Parking and Preferred Trail Alternatives. Construction of the Preferred Parking and Preferred Trail Alternatives would result in short-term noise impacts during construction.

Parkland — Section 4(f) Resources

The affected area qualifies under Section 4(f) as a publicly owned park and a historic site. The trail portion of the project is not a Section 4(f) use of Park property since the trail is a Park use. The additional parking is expected to enhance the GWMP by removing parking from the circle and protecting the cultural landscape. Therefore, under Section 138 of Title 23 of the United States Cod, this project qualifies as an exception to Section 4(f) analysis. Although clearing of NPS land would be necessary, the proposed actions are also expected to enhance Park resources by resolving parking and access issues and concerns. Therefore, no impairment to the existing Park resources would occur, and a Section 4(f) resources analysis is not required.

Historic and Cultural Resources

Historic Architectural Resources
Mount Vernon is listed on the National Register of Historic Places, the Virginia Landmarks Register, and is a National Historic Landmark. The National Register boundaries include 420 acres consisting of three tracts. The Mount Vernon Memorial Highway is listed on the National Register of Historic Places and the Virginia Landmarks Register. No adverse impacts on architectural resources are anticipated to occur under the Preferred Parking and Preferred Trail Alternatives. The Virginia State Historic Preservation Office (SHPO) concurred with the findings of the report in a letter dated May 7, 2004 and with the updated project design having no adverse affects in a letter dated July 26, 2004.

Archaeological Resources

Several archaeological sites have been recorded within the study area, the majority of which are recorded within the National Register boundaries of Mount Vernon. There are 15 prehistoric sites, three historic sites, and ten prehistoric/historic multicomponent sites. No impact on significant archaeological resources is anticipated under the Preferred Parking and Preferred Trail Alternatives. The Virginia SHPO concurred with the findings of the report in a letter dated May 7, 2004 and with the updated project design having no impact on significant archaeological resources in a letter dated July 26, 2004.

Aesthetics and Viewsheds

No adverse impacts are anticipated to occur to the aesthetics and viewsheds of Mount Vernon and the GWMP under the Preferred Parking and Preferred Trail Alternatives. Consultation with the Virginia State Historic Preservation Office as stipulated by Section 106 of the National Historic Preservation Act of 1966, as amended, will be necessary to reach a consensus determination of effect on historic properties for the aesthetics and viewshed of Mount Vernon and the GWMP.

Mount Vernon Visitation

No changes to visitation would occur under the Preferred Parking Alternative. A minor increase in visitation is anticipated under the Preferred Trail Alternative.

Existing Roadways

The roadway network around Mount Vernon consists of the GWMP, Route 235, and local streets. The Preferred Parking and Trail Alternatives would not have any impacts on the existing road network.

Mount Vernon Parking

Mount Vernon Parking Capacity

The NPS has two visitor parking lots for Mount Vernon visitors. The East Parking Lot (land owned by Mount Vernon) is located east of the GWMP and contains 238 parking spaces. It has one entrance from the circle and one exit onto the GWMP. This parking lot also contains parking for recreational vehicles. The Mount Vernon Trail ends at the northern end of this parking lot. The West Parking Lot is located east of Route 235 North. The exit is located on the GWMP while the entrance is located on Route 235. The West Parking Lot contains 144 spaces. There is also a 42-space parking lot on Route 235 West approximately 300 feet northwest of the circle. This also serves a post office, and the land is owned by MVLA with a perpetual parking easement to NPS. Post office patrons and Mount Vernon visitors share this lot. Tour bus parking is located along the southern edge of Route 235 West. Overflow parking is currently accommodated in the circle. Shuttles are also used on peak days, such as George Washington's birthday.

Existing Mount Vernon Parking Demand

It was determined that the East Parking Lot, West Parking Lot, and Route 235 West Parking Lot could hold a total of 424 vehicles. During busy days in the spring, summer, and fall, the NPS allows Mount Vernon visitors to park on the circle. The circle is estimated to accommodate 150 vehicles. On very busy days when the circle is full, people also park illegally along the roadways. By summing the amount of parking spaces in the parking lots and the estimate for the circle, the demand for parking spaces during a peak season weekend day was calculated to be 599 spaces.

Future Mount Vernon Parking Demand

The parking situation for visitors at Mount Vernon was analyzed for current conditions and projections made for future conditions. Mount Vernon does not expect the number of annual or daily visitors to increase in the future. Thus, the primary difference between the current and future conditions is the average length of time that visitors are expected to spend at Mount Vernon. The predicted increase is from 135 minutes (2.25 hours) to 236 minutes (3.93 hours).

In the future, in order to park 90% of the vehicles in visitor lots (not including parking in the circle), an additional 290 spaces must be constructed. If 290 spaces were added to the existing 424 existing visitor spaces, visitors would be unable to find a space in a parking lot only 37 days a year (10%). This 90% level was determined to be an appropriate goal for planning the number of parking spaces needed. The Preferred Parking and Preferred Trail Alternatives would meet the current and projected need for parking, alleviate the parking need at the circle, and provide much needed trail connectivity in the area.

Traffic Operations

The Preferred Parking Alternative would not have a negative impact on traffic operations in the area. The Preferred Trail Alternative would have a minor positive impact to reduce the conflicts between automobiles, pedestrians, and cyclists in the study area.

Cumulative Impacts

A number of additional improvements are currently underway in the vicinity of Mount Vernon and the southern end of the GWMP that may have a minimal cumulative impact on this project, including:

- Repaving the Mount Vernon Trail from Mount Vernon to Fort Hunt (NPS)
- Placing headwalls and endwalls along the Mount Vernon Trail to prevent flooding (NPS)
- Applying for a cell tower to be located in the Fort Hunt area (the tower would be located on school property but would impact the GWMP viewshed) (NPS)

The following additional projects are in progress in the vicinity of Mount Vernon and the GWMP, but are not expected to impact the current project:

- Drafting an Environmental Assessment to study the possibility of widening US 1 from the Stafford County line south of Fairfax County to Alexandria (VDOT)
- Stabilizing the Riverside Park shoreline (NPS)
- Reconstructing the two bridges along the Mount Vernon Trail — Bridge 6 is located south of Fort Hunt, and Bridge 12 is located just north of Fort Hunt (NPS)
- Installing a vault toilet at Riverside Park (NPS)

Development of the proposed parking lots will remove the parking from the circle, therefore adding to the aesthetic and cultural landscape of the GWMP and Mount Vernon. The improvements to the Mount Vernon Trail result in much needed connectivity to the trail system. The proposed extension of the trail to connect with the Fairfax County trail system will enhance the experience of cyclists and pedestrians using the trail, and potentially encourage more trail users.

None of the alternatives are anticipated to have an impact on neighborhoods in the study area, the socioeconomic environment or cultural resources, including architectural and archaeological resources. None of the alternatives are anticipated to have an impact on traffic patterns outside of the study area. The project assumes that the number of visitors to Mount Vernon will not change, and that parking facilities for the current visitors will be improved.

IMPAIRMENT OF PARK RESOURCES

National Park service may use its discretion to allow impacts to Park resources and values when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values. An impact to any Park resource or value may constitute an impairment when the conservation of that resource is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- Key to the natural or cultural integrity of the Park or to opportunities for enjoyment of the park; or
- Identified as a goal in the Park's general management plan or other relevant NPS planning documents.

An impact would be less likely to constitute an impairment to the extent that it is an unavoidable result, which cannot reasonably be further mitigated, of an action necessary to preserve or restore the integrity of Park resources or values.

The portion of George Washington Memorial Parkway where this project is proposed (Mount Vernon Memorial Highway) was established as a memorial to George Washington to connect Mount Vernon with the south end of the Memorial Bridge. This memorial highway, the first federally funded highway, "would be unsurpassed in beauty by any highway in the country, and would form a recreational driveway unsurpassed in any capital city of the world." Its design intent "was to provide a thoroughfare of sufficient width over which traffic could move with the least possible interruption, and the greatest possible enjoyment."[1] Roadway alignment, topography, vistas, and parkway structure were the landscape elements employed by the Highway designers to achieve the desired "memorial character."[2] It is this "memorial character" that establishes a large portion of the Park's values. The 1927 Senate Park Commission recommended the development of such a road because of the beautiful views it would reveal. The views, not the historical association with Mount Vernon, convinced the Commission that the Highway's inclusion in the park system of Washington was of utmost significance.[3]

Parking conditions at Mount Vernon Estate and Gardens was a major issue to be resolved in the design of the parkway in 1929. Pedestrian and vehicular conflicts existed as did the cluttered appearance around the entrance into the Estate. The terminus at Mount Vernon was designed to provide parking facilities for automobiles and buses according to the final landscape report written by Wilbur H. Simpson, Senior Landscape Architect in 1932. Parking facilities for 350 passenger cars and 60 buses were developed to meet "ordinary requirements". The report went on to state that by utilizing additional natural ground surface as overflow parking for 2,500 or more vehicles is permissible. The incidental features of the roadside were carefully designed and located along the highway with respect to adjacent features so as to harmonize as unobtrusively as possible with the informal surroundings. The conservation and preservation of existing natural scenery was however permanently assured through buffer strips of land protecting each side of the roadway.

The current parking situation in the Mount Vernon area allows visitors to park on the circle when the existing visitor parking lots are at capacity. There are approximately 50 days a year when visitors are directed to park in the circle, and for 15 of those days, the circle also is filled to capacity. Projected increased parking demand as a result of expanded programs at Mount Vernon will substantially increase the number of days that additional parking is needed. This results in an undesirable situation for the NPS and the MVLA, since parked vehicles negatively impacts the aesthetics of the GWMP and Mount Vernon, soils and vegetation on the circle, and traffic operations in the area. The Preferred Parking Alternative proposes a 150-space expansion of the existing West Lot on NPS land, and a 140-space overflow lot

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[1] Final Report: The Mount Vernon Memorial Highway, The Landscape Architectural Problems in its Development by Wilbur H. Simpson, Senior Landscape Architect, 1932.

[2] Cultural Landscape Report, Mount Vernon Memorial Highway, EDAW, Inc.

[3] United States Congress, Senate Report, Mount Vernon Memorial Highway, Report No. 469, 70th Session, January, 1927.

behind the wall south of Route 235 West on Mount Vernon property. Since it is estimated that the circle currently accommodates a maximum of 150 parked vehicles, the West Lot expansion would allow visitors to use one of the parking lots rather than parking in the circle (which would no longer be allowed). On the days when the number of visitors exceeds the available spaces in the West and East Lots, vehicles would be directed to park in the overflow lot on Mount Vernon property. The Preferred Parking Alternative would restore the integrity of the circle.

The West Lot expansion shown in the site plan will impact approximately 1.3 acres of forested land, including approximately 77 trees on NPS property. The overflow lot will impact approximately 2.1 acres of maintained grassy land, including 21 trees less than six inches in diameter on Mount Vernon property. Two oak trees larger than six inches in diameter will be removed for the driveway to the overflow lot.

The Preferred Trail Alternative will impact approximately 0.2 acres of sparsely forested land. The trail has been designed to avoid large trees where possible, and will impact approximately 28 trees larger than 6 inches. The trail improvement will join two existing trails, both enhancing the recreational value of the existing trails and improving the safety benefits for pedestrians, cyclists, and motorists in the Mount Vernon area. The trail extension may increase the use of bikes to commute rather than personal vehicles, improving quality of life in the area by decreasing congestion and air/noise pollution. The trail extension is also anticipated to have a positive impact on the East Parking Lot, since it will direct cyclists and recreational pedestrians away from the vehicular traffic in the East Lot, improving safety conditions for cyclists, pedestrians, and drivers.

The NPS has determined that the implementation of the preferred alternatives will not constitute impairment to the GWMP's resources or values or violate the NPS Organic Act. This conclusion is based on a thorough analysis of the environmental impacts described in the EA, and the professional judgment of the decision-maker guided by the direction in *NPS Management Policies 2001*. Although the proposed action does have some impacts to the natural, cultural, and historic environment, in all cases they are a result of actions taken to resolve parking and access concerns and maintain accessibility to the Mount Vernon Estate. The location and design of the additional parking is in keeping with the design intent of the parkway and maintains the "memorial character" of the road. Overall, the plan results in benefits to park resources and values, and opportunities for public enjoyment in a safe manner. As described in the environmental assessment, implementation of the preferred alternative will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the George Washington Memorial Parkway; (2) key to the natural or cultural integrity of the park; or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents.

PUBLIC INVOLVEMENT

The public has been involved with this project on two levels. First, the Stakeholders Participation Panel (SPP) is composed of citizens who represent the interests of the community near Mount Vernon. These citizens were appointed by Fairfax County Supervisor Gerry Hyland, who also sits on the panel. Regular meetings have been held between the FHWA, NPS, the MVLA, and the SPP to discuss the project and alternatives, and to receive feedback and guidance from these groups. The SPP was comprised of the following members:

- Gerry Hyland, Fairfax County Supervisor
- Jim Cossey, Committee Chair, Mount Vernon Council of Citizens Associations (MVCCA) Transportation
- Frank Cohn, Committee Vice Chair, MVCCA Transportation
- Jim Davis, Environment and Recreation Committee, MVCCA
- Earl Flanagan, Mount Vernon Transportation Commissioner

- Mark Gionet, Wessynton At-Large
- Sheldon W. Hoenig, Wessynton Homeowners Association
- Milt Kabler, Wessynton Homeowners Association
- Chris Ragland, Wessynton At Large
- Dallas Shawkey, MVCCA Public Safety
- Larry Zaragoza, Environment and Recreation Committee, MVCCA

The SPP met June 16, 2004 to discuss the findings in the Environmental Assessment. Prior to the meeting, the NPS had reviewed the results of the study and had modified the layout of the West Lot expansion while retaining the number of spaces provided. The SPP endorsed the new layout unanimously, but recommended that lighting within the parking lot be extended to illuminate all portions of the lot; the FHWA agreed to modify the design to accommodate this recommendation.

The general public was involved through workshops and written comments. At the two public workshops (June 26, 2002 and January 21, 2003), citizens were given the opportunity to discuss their thoughts and concerns with representatives from the FHWA, NPS, VDOT, and Fairfax County. A third public workshop was held January 29, 2004 to present the recommendations in the EA. A summary of comments received after the public meeting and availability of the EA for public review is included in Appendix B.

AGENCY COORDINATION

Coordination and consultation was held with regulatory and resource agencies and organizations throughout the course of the study. An interagency kickoff meeting was held on April 18, 2002, which introduced participating agencies to the project and requested their areas of interest and concerns. Agencies also provided additional information regarding the study area and related projects. Those agencies attending the kickoff meeting included Federal Highway Administration, National Park Service, Virginia Department of Transportation, Fairfax County Departments of Planning and Transportation, and Mount Vernon Ladies Association. Concerns expressed by agencies involved visual impacts, traffic, parking, the bike trail, Mount Vernon visitation, Mount Vernon employee parking, and the NEPA planning process in general.

The following agencies were invited to public meetings and also were sent copies of project newsletters and the Environmental Assessment.

- U.S. Department of Transportation, Federal Highway Administration, Eastern Federal Lands Highway Division
- U.S. Department of Transportation, Federal Highway Administration, Virginia Division
- U.S. Department of Interior, National Park Service, GWMP Unit
- Honorable James P. Moran, U.S. House of Representatives
- Honorable Gerry Hyland, Supervisor, Mount Vernon District, Fairfax County
- Honorable Anthony H. Griffin, Fairfax County Executive
- National Capital Planning Commission
- U.S. Commission of Fine Arts
- Virginia State Historic Preservation Officer
- Advisory Council on Historic Preservation
- Virginia Department of Transportation

- Virginia Department of Environmental Quality
- Virginia Department of Agriculture and Consumer Services
- Virginia Marine Resources Commission
- Virginia Department of Forestry
- Chesapeake Bay Local Assistance Department
- Fairfax County Department of Transportation
- Fairfax County Department of Planning and Zoning
- Fairfax County, Virginia, Department of Public Works and Environmental Services
- U.S. Fish and Wildlife Service
- U.S. Environmental Protection Agency
- U.S. Army Corps of Engineers
- Mount Vernon Ladies' Association
- Fairfax County Wetlands Board
- Northern Virginia Regional Commission

Agencies providing written comments included:

- Virginia State Historic Preservation Officer
- Virginia Department of Transportation
- Virginia Department of Environmental Quality
- Virginia Department of Agriculture and Consumer Services
- Virginia Marine Resources Commission
- Virginia Department of Forestry
- Chesapeake Bay Local Assistance Department
- Fairfax County Department of Planning and Zoning
- Fairfax County, Virginia, Department of Public Works and Environmental Services
- Northern Virginia Regional Commission

Comments and responses are included in Appendix A.

CONCLUSION

The NPS and FHWA conclude that the selected action will not constitute a major Federal action having significant effect on the human environment within the definition of Section 102(2)(C) of the National Environmental Policy Act of 1969. Therefore, the preparation of an Environmental Impact Statement is not required. The environmental impacts resulting from the implementation of the proposed action will be mitigated. This project will not violate any Federal, State, or local environmental protection law.

RECOMMENDED: 8-19-04

for Audrey F. Calhoun, Superintendent
George Washington Memorial Parkway
Date

APPROVED: 9/27/04

Terry R. Carlstrom, Regional Director
National Capital Region
National Park Service
Date

10.13.04

Melisa L. Ridenour, Division Engineer
Eastern Federal Lands Highway Division
Federal Highway Administration
Date

APPENDIX A

Response to Agency Comments

Response to Agency Comments

Northern Virginia Regional Commission (NVRC)
Mr. James Van Zee – Director, Regional Planning Services
March 23, 2004

Comment: The area's Resource Management Area (RMA) designation requires that all development result in a no-net-increase standard for phosphorus loadings.

> Response: The proposed underground stormwater management system will include filtering and/or settling to meet these requirements.

Comment: The developing agency must adhere to the post development water quality requirements set forth by the Virginia Stormwater Management Regulations.

> Response: The stormwater management system will be designed to meet these requirements.

Comment: Where possible, opportunities for retrofit of existing stormwater quantity facilities to stormwater quality facilities through new construction activities are suggested to be explored.

> Response: The parking lot design will investigate the feasibility of retrofitting existing stormwater quantity facilities to provide for the treatment for water quality as part of this project.

Commonwealth of Virginia Department of Historic Resources (DHR)
Mr. Marc Holma, Architectural Historian, Office of Review and Compliance
March 31, 2004

Comment: Any proposed changes to Mount Vernon and the George Washington Memorial Parkway must be done in such a way to minimize any potential to adversely affect contributing architectural resources, archaeological sites, and important landscape features. We concur that there will be No Adverse Effect on known architectural resources listed in or eligible for the National Register, namely Mount Vernon and the George Washington Memorial Parkway.

> Response: No response necessary.

Comment: We are unable to comment on the potential of the project to affect archaeological resources without additional information.

> Response: Two copies of the report titled *Cultural Resources Identification Survey: Improvements to Traffic and Visitor Parking, George Washington's Mount Vernon Estate and Gardens* (2003) were sent as requested and approved by DHR (see letter below, dated May 7, 2004).

Commonwealth of Virginia Department of Historic Resources
Mr. Marc Holma, Architectural Historian, Office of Review and Compliance
May 7, 2004

Comment: Based upon the information provided we concur with the recommendation that no further investigation of the project area is necessary. We have determined, therefore, that there will be no adverse effect to historic resources as a result of the planned improvements.

> Response: No response necessary.

Fairfax County Department of Planning and Zoning
Mr. Fred R. Selden – Director, Planning Division
April 14, 2004

Comment: There may be some displacement of animals resulting from construction of the two parking areas, and the bald eagle was identified as a Federal and State Threatened Species which inhabits the project area. However, the EA notes that according to a letter from the U.S. Fish and Wildlife Service, "it appears that this project is not likely to adversely affect any federally or proposed species or their designated habitat."

Response: No response necessary.

Comment: There are no specific provisions made for water quality improvements.

Response: An underground stormwater management system has been proposed to manage water runoff and improve water quality of the runoff.

Comment: The study does not specify what days of the week noise measurements were taken or the date on which they were taken. Also, the text indicates that four 30-minute noise samples were taken, and Figure A4 notes that three 15-minute samples and a single 24-hour noise sample were taken.

Response: The 24-hour measurement was performed Wednesday, June 26, 2002. The AM peak period noise measurements were performed on Thursday, June 27, 2002. The peak period measurements were performed for 30-minute periods (not 15 minutes as shown in Figure A4) at the four locations indicated on the figure.

Comment: For the trail, the 10-foot wide trail for both pedestrians and bicycle traffic in the circle area appears too narrow. It is suggested that the width of this trail be increased to 12 feet and that the "passenger loading area" be narrowed. It is not clear if there will be a physical barrier between the trail and vehicular lanes. As a safety measure, it is recommended that a physical barrier such as flexible bollards be provided between the trail and vehicular lanes. The provision of bicycle lockers at the Estate is also recommended.

Response: The 10-foot-wide trail is consistent with NPS standards and with the existing Mount Vernon Trail. A physical barrier will be provided between the trail and vehicular traffic on the circle as shown on the site plan. Bicycle lockers will be considered during final design of the trail.

Comment: Staff remains concerned that the EA does not fully support the approach of the Preferred Alternative. The EA does not fully discuss other points of justification for the Preferred Alternative such as economics and security issues that may reinforce the argument to proceed with the Preferred Alternative in its current form.

Response: Economics, security, and other issues that reinforce the Preferred Alternative are discussed in Chapter 2, specifically in the discussion of alternatives that were considered and eliminated (pages 2-5 through 2-7).

Virginia Department of Transportation (VDOT)
Ms. Jan S. Vaughan – Assistant District Location and Design Engineer
March 3, 2004

Comment: For the proposed driveway at the overflow lot, is appears that there will be inadequate sight distance at the new entrance. If this is the case, a formal design exception must be granted by the State Location and Design Engineer before an entrance permit would be granted.

Response: If it is determined by VDOT that the final design does not provide adequate sight distance, a design exception will be requested.

Comment: Based on the determination above, it is our recommendation that the overflow lot be constructed as Phase II of the project.

Response: No response necessary.

Fairfax County Planning Design Division, Department of Public Works and Environmental Services
Mr. Ahmed I. Rayyan – Chief, Planning Support Branch
April 6, 2004

Comment: We have no comments.

Response: No response necessary.

Virginia Department of Environmental Quality (DEQ)
Ms. Ellie L. Irons – Program Manager, Office of Environmental Impact Review
April 15, 2004
(As State Clearinghouse, DEQ comments incorporated those of Department of Agriculture and Consumer Services (VDACS), Department of Conservation and Recreation (DCR), Department of Health, Department of Transportation (VDOT);
Marine Resources Commission, Department of Historic Resources(DHR), Department of Forestry, Chesapeake Bay Local Assistance Department, Northern Virginia Regional Commission, and Fairfax County)

Comment: Provided that these projects are constructed according to the following recommendations and that laws and regulations are followed, the Commonwealth has no objection to a Finding of No Significant Impact.

Response: Please see responses to specific recommendations.

Comment: VDACS concurs that the proposed project would not affect the bald eagle, as concluded by the DCR.

Response: No response necessary.

Comment: Agencies should take all reasonable precautions to limit emissions of VOCs and NOx, principally by controlling or limiting the burning of fossil fuels. A second precaution...is...limitations on the use of "cut-back" ...that may apply in the construction of parking lot or trails. The asphalt must be "emulsified"...except when specified circumstances apply. Moreover, there are time-of-year restrictions on its use....

Response: The burning of fossil fuels during construction will be limited to the extent practicable. If liquefied asphalt cement ("cut-back") is used, it will be emulsified to comply with regulations and will only be used during the months of April through October.

Comment: The proposed action includes no mitigation provisions for fugitive dust during construction. Fugitive dust must be kept to a minimum by using control methods outlined in 9 VAC 5-50-60 et seq. of the Regulations for the Control and Abatement of Air Pollution. The EA dismisses both long-term and short-term air quality impacts as negligible, and so does not address either in detail.

Response: Dust will be controlled during construction as specified in the cited regulations.

Comment: If project activities include the burning of construction or demolition material, this activity must meet the requirements of the regulations for open burning (9 VAC 5-40-5600 et seq.) and it may require a permit.

Response: Any burning will be conducted in accordance with the cited regulations and any applicable local ordinances. Any required permits will be obtained prior to construction.

Comment: Since two of the disturbed parcels involve land disturbance activities of one acre or more, Virginia Pollution Discharge Elimination System (VPDES) stormwater general permit coverage will be required for stormwater discharges during construction.

Response: Any required permits will be obtained prior to construction.

Comment: Based on information in the EA, the project is unlikely, in DEQ's judgment, to significantly affect water resources or wetlands. It is recommended by the DEQ Northern Virginia Regional Office that any wetlands be delineated to determine wetland boundaries in the project area.

Response: Wetlands will be delineated, if required, during design of the parking lot. A Virginia Water Protection Permit will be obtained if required.

Comment: The EA addressed hazardous waste issues and sites, but did not address solid waste resulting from the proposed project. DEQ's Waste Division did a cursory review of its data files and did not find any additional contamination sites that might affect, or be affected by, the project. The EA did not address pollution prevention. DEQ encourages proponents to implement pollution prevention principles.

Response: Construction will be performed in such a manner as to reduce wastes at the source, re-use materials, and recycle waste materials to the maximum extent practicable.

Comments on historic structures and archaeological resources were the same as received from Department of Historic Resources.

Response: See previous response to DHR.

Comment on Chesapeake Bay preservation areas was the same as received from Northern Virginia Regional Commission)

Response: See previous response to NVRC.

Comment: This project must comply with the Virginia Erosion and Sediment Control Law, the Virginia Stormwater Management Law, and other applicable federal non-point source pollution control mandates such as section 313 of the Clean Water Act and the federal consistency requirements of the Coastal Management Act. Proponent agencies should prepare and implement Erosion and Sediment Control Plans and Stormwater Management Plans that comply with state law.

Response: The project will comply with all applicable requirements listed in the above comment.

Comment: The Department of Forestry indicates that the project will not significantly affect the forests of the Commonwealth. In order to protect trees in the vicinity of the project from the effects of the project, the proponent agencies should mark and fence them at least to the dripline or the end of the root system, whichever extends farther from the tree stem. If parking and stacking are unavoidable, temporary crossing bridges or mats should be used to minimize soil compaction and mechanical injury to plants. Any stockpiling of soil should take place away from trees, and stockpiles should be covered to prevent soil erosion and fugitive dust.

Response: Trees to be protected will be marked and the driplines or root systems will be indicated. Any soil stockpiles will be stored aware from trees and covered as required.

Comment: According to the DCR, no state natural area preserves, scenic resources, or recreation facilities under DCR jurisdiction would be affected by this project.

Response: No response necessary.

Comment: DEQ offered several pollution prevision recommendations:

- Consider development of an Environmental Management System (EMS)
- Consider environmental attributes when purchasing materials
- Consider contractors' commitments to the environment when choosing contractors
- Choose sustainable materials and practices for construction and design

Response: Selection of contractors and materials will be made using FHWA's standard procurement policies, which contain many of these environmental requirements.

Comment: Based on a review by VDOT of the adopted regional Transportation Improvement Program (TIP) and Constrained Long-Range Plan (CLRP), there are no road projects planned in the vicinity that would be affected by the project. The proposed expansion of the West Lot is not expected to increase congestion on Route 235; however, it may help reduce congestion in the circle by reducing the need for visitors to park on the edge of the circle. The proposed trail is not expected to affect Route 235 but will connect segments of the regional trail network, enhancing safety for trail users.

Response: No response necessary.

Comment: The highly textured surface proposed for the trail surface may have a detrimental effect on use of the trail by handicapped people using canes or wheelchairs.

Response: Handicapped people entering Mount Vernon from the parking lot will use the sidewalks rather than the trail. Other portions of Mount Vernon Trail are not constructed to ADA standards.

Comment: Placement of the trail at the same level as the roadway will, in the judgment of VDOT, provide a false sense of security between Route 235 and the circle's loading area. VDOT recommends either a five-foot separation on a physical barrier between the roadway and the trail. Fairfax County recommends that a physical barrier such as flexible bollards be provided between the trail and the road.

Response: A physical barrier will be provided between the trail and vehicular traffic on the circle as shown on the site plan.

Comment: The proposed trail design and location will have safety and aesthetic benefits.

Response: No response necessary.

Comment: The impact of using "intelligent crosswalk technologies" to enhance pedestrian and bicycle detection cannot be evaluated without identifying which technologies will be used.

Response: No specific intelligent crosswalk technologies have been evaluated. Some that could be used could range from push-button actuated pedestrian signals to audible signals to detection of pedestrians or cyclists. These issues will be addressed during final design.

Comment: Bicycle lockers at Mount Vernon are recommended for safe bicycle parking.

Response: Bicycle lockers will be considered during the final design of the trail.

Comments under Regional and Local Comments and Concerns were the same as received from Fairfax County Department of Planning and Zoning.

Response: See previous response to Fairfax County Department of Planning and Zoning.

Comment: The following permits and coordination may be required:

- Air pollution control permits for open burning of land-clearing or other debris as well as for the construction and operation of stationary or mobile fuel-burning construction equipment.
- Subaqueous lands encroachment permit if any parts of the trail or parking lots involve any encroachment channelward of ordinary high water along natural rivers or streams.
- All work which may affect roads or other transportation facilities should be coordinated with VDOT's Northern Virginia District Office.
- Analysis and submissions regarding the Virginia Coastal Resources Management Program Enforceable Policies.
- Consult with the U.S. Fish and Wildlife Service and VDGIF to ensure compliance with the Endangered Species Act and state protected species legislation.
- VPDES Stormwater General Permit for Construction and Virginia Water Protection Permit, administered by DEQ's Northern Virginia Regional Office.
- Consult with DCR's Potomac Watershed Office for erosion control and stormwater management advice.
- Consult with the Chesapeake Bay Local Assistance Department about compliance with the Chesapeake Bay Preservation Act and the Chesapeake Bay Preservation Area Designation and Management Regulations.
- Comply with applicable laws and regulations regarding solid and hazardous waste management.

Response: The above regulations will be complied with as applicable to this project.

APPENDIX B

Public Meeting Comment Summary
January 29, 2004

Comment Summary
January 29, 2004 Public Meeting
Mount Vernon Circle Environmental Assessment
Walt Whitman Middle School, Alexandria, Virginia

The following is a summary of comments from the third public information meeting held as a part of the public involvement process for the Mount Vernon Circle Environmental Assessment. The meeting was held on Thursday, January 29, 2004 from 6:30 PM to 8:30 PM at the Walt Whitman Middle School in Alexandria, Virginia. The middle school is located northwest of the study area. The public was able to review boards with information related to the project for the first 30 minutes, while personnel from the Federal Highway Administration Eastern Federal Lands Highway Division and Kimley-Horn and Associates, Inc. were available to answer questions. At 7:00 PM, Larry Meisner from Kimley-Horn made a presentation summarizing the project and the recommended parking and trail alternative.

Following the presentation, FHWA Project Manager Jack Van Dop facilitated a public comment period when the citizens attending the meeting had the opportunity to offer their opinions about the project and the alternative. The public was given the option of providing written comments at the meeting or sending in comments via mail until February 28, 2004. Responses to questions and comments given by citizens during the meeting will be posted to the FHWA website (http://www.efl.fhwa.dot.gov/planning/nepa/index.htm).

A total of 64 people attended the meeting on January 29, 2004. Of the people who attended, seven provided written comments at the meeting. During the 30-day comment period following the meeting, an additional 14 people submitted comments, including one citizen who had not attended the public meeting. A total of 20 citizens who attended the meeting commented on the project, providing a response rate of approximately 31% of those attending the meeting.

The comment form provided asked two questions. The questions are as follows:

- Is the Preferred Build Parking Alternative acceptable to you?
- Is the Preferred Trail Improvement Alternative acceptable to you?

The following paragraphs summarize the public's responses to each of these questions, based on the comment forms received.

Is the Preferred Build Parking Alternative acceptable to you?

Of the 19 citizens who responded to this question, 58 percent (11 citizens) said Yes, the Preferred Build Parking Alternative was acceptable. Of the eight citizens who said that this alternative was not acceptable, the primary suggestions were to either construct the full number of required parking spaces on Mount Vernon property behind the west wall, or to phase the two proposed parking areas beginning with the parking lot behind the west wall.

Is the Preferred Trail Improvement Alternative acceptable to you?

Of the 18 citizens who responded to this question, 56 percent (10 citizens) said Yes, the Preferred Trail Improvement Alternative was acceptable. Of the eight citizens who said that this alternative was not acceptable, the principal reason was that an improvement to the trail system around Mount Vernon was not necessary and would disturb the environment.

Other Comments Received

Citizens had the opportunity to make additional comments about the project on the comment form and in additional letters. The summary of additional comments and their responses are as below:

Comment: Expand East Parking Lot rather than West Parking Lot to reduce conflict.
Response: East Parking Lot cannot accommodate additional 150 parking spaces in the surface lot. The option of a structured parking was considered and eliminated due to cultural, maintenance and construction costs, and security concerns.

Comment: As I recall, the land proposed for extension north of the West Parking Lot was ceded to the Estate on the condition that no construction be undertaken in that area.
Response: Based on the earlier comments from citizens and safety concerns on Route 235 North, parking expansion on Mount Vernon Estate property west of Route 235 north is not chosen as the preferred alternative. The proposed expansion of West Lot is on NPS property.

Comment: Is this EA going to analyze the effect on the environment of the proposed Mount Vernon Interpretive Buildings and their construction? How will the Mount Vernon stage construction for the Interpretive Buildings? Where will the contractor access the site?
Response: No. These buildings are not in the scope of this project.

Comment: The methodology used to generate baseline conditions for parking on the circle has not been endorsed by the public at the previous meetings.
Response: As requested in the previous meetings, parking analysis was made available for public review and was posted on the website.

Comment: Clarify who is paying for which portion of the project.
Response: Funding for construction has not yet been identified.

Comment: Who will sign the Record of Decision?
Response: The FHWA and NPS will sign the decision document.

Comment: Provide the details of access, bus parking and traffic circulation for the parking lot behind the wall.
Response: The preliminary site plan developed with the EA shows the approximate location of the parking lot behind the wall. Additional details for access and traffic circulation will be developed with the final plans.

Comment: Develop an alternative that includes parking but no change to the bike path. The trail relocation as shown creates multiple conflict points with vehicular traffic. The number of users does not justify the proposed improvements.
Response: The proposed trail improvements would provide a missing link between the Mount Vernon Trail and the Potomac Heritage Trail. It is anticipated that the proper signage and a well-delineated trail would eliminate the conflicts between pedestrians, vehicular traffic, and trail users.

Three citizens expressed that the project team (including the Federal Highway Administration (FHWA), Stakeholders Participation Panel (SPP), the National Park Service (NPS), Virginia Department of Transportation (VDOT), and the Mount Vernon Ladies' Association (MVLA)) achieved a reasonable compromise.

APPENDIX C

Tree Impact Summary

Summary of Impacted Trees

Mount Vernon, Virginia

Western Parking Expansion

Size (inches, dbh)	Number of Trees Removed
6	4
7	11
8	10
9	4
10	5
11	4
12	2
13	2
14	4
17	2
18	1
19	1
20	5
21	3
22	3
23	1
24	3
25	1
26	4
28	1
29	1
30	2
32	1
35	1
36	1
Total	**77**

Type	Number of Trees Removed
American Elm	2
Black Cherry	2
Black Locus	1
Black Oak	2
Cherry	6
Dogwood	1
Post Oak	8
Red Maple	7
Southern Red Oak	25
Sweet Gum	14
Virginia Pine	8
Unknown Species	1
Total	**77**

Trail

Size (inches, dbh)	Number of Trees Removed
6	15
7	1
8	8
10	3
15	1
Total	**28**

Type	Number of Trees Removed
Oak	21
Holly	6
Unknown Species	1
Total	**28**

Overflow Parking Lot

Size (inches, dbh)	Number of Trees Removed
Not Tabulated*	21
Total	**21**

* Un-tabulated trees were impacted but no information was given in tree survey tabulation. Based on available data, assume size of trees not tabulated is < 6 inches.

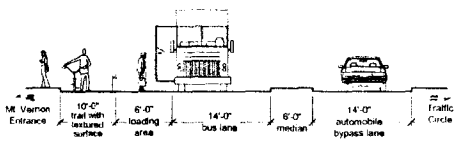
Project Total

Size (inches, dbh)	Number of Trees Removed
< 6*	21
6	19
7	12
8	18
9	4
10	8
11	4
12	2
13	2
14	4
15	1
17	2
18	1
19	1
20	5
21	3
22	3
23	1
24	3
25	1
26	4
28	1
29	1
30	2
32	1
35	1
36	1
Total	**126**

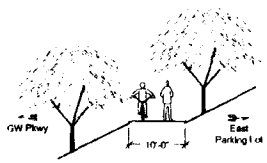
Type	Number of Trees Removed
American Elm	2
Black Cherry	2
Black Locus	1
Black Oak	2
Cherry	6
Dogwood	1
Holly	6
Oak (species unknown)	21
Post Oak	8
Red Maple	8
Southern Red Oak	25
Sweet Gum	14
Virginia Pine	8
Not Tabulated	21
Unknown Species	1
Total	**126**

MAP NOTE:
ALL EXISTING TOPOGRAPHIC INFORMATION SHOWN ON THIS SHEET WAS TAKEN FROM FAIRFAX COUNTY GIS DEPARTMENT. ORTHOGRAPHIC PHOTOS AND HARDCOPY PLANS PROVIDED BY OTHERS WERE USED TO BEST REPRESENT EXISTING SITE FEATURES.

Property Line
Right of Way Line
Proposed West Parking Lot Expansion 150 Net New Spaces
Existing West Parking Lot
GEORGE WASHINGTON MEMORIAL PARKWAY
MOUNT VERNON HIGHWAY
Existing Trail Head
Easement Line
Proposed Overflow Lot 140 Total Spaces Provided
Preferred Trail Alternative
Existing Freestanding Screenwall
Proposed Crosswalk (Typ.)
Right of Way Line
Post Office
Existing Gate
Existing Route 235 Parking Lot
Existing East Parking Lot
Existing West Parking Lot
Meandering Trail (avoid existing vegetation)
Existing Freestanding Screenwall
Re-stripe Parking for Reversed Circulation
Existing Trail Head
Existing Crosswalks
SIGN: Cyclists Must Walk Bikes
Restaurant and Gift Shop
Proposed Trail with Textured Surface and 6" Curb Adjacent to Vehicular Lane
Relocated Median
Bus Loading Area with Bollards
Mt. Vernon Entrance
SIGN: Cyclists Must Walk Bikes
GRAPHIC SCALE
(IN FEET)



Trail Option A - Section at Mt. Vernon Entrance (not to scale)



Trail Option A - Section Along GW Pkwy (not to scale)

Kimley-Horn and Associates, Inc.
PREPARED IN THE OFFICE OF
P.O. BOX 33068 - RALEIGH, NORTH CAROLINA 27636-3068
PHONE: (919) 677-2000 FAX: (919) 677-2050

PROJECT: MOUNT VERNON CIRCLE ENVIRONMENTAL ASSESSMENT
SHEET NUMBER: 1 of 1
DATE: 01/07/2003
DRAWN BY: E.K.G.
CHECKED BY: E.K.G.
APPROVED BY: LM

Figure B1
Preferred Build Parking Alternative and Preferred Trail Improvement Alternative Tree Survey

TRANSPORTATION & DEVELOPMENT