



United States Department of the Interior



NATIONAL PARK SERVICE
George Washington Memorial Parkway
700 George Washington Memorial Parkway
McLean, VA 22101

IN REPLY REFER TO:

1.A.1 (GWMP)

Ms. Sarah M. Clarke
Environmental Program Planner
Commonwealth of Virginia
Department of Transportation
1401 East Broad Street
Richmond, Virginia 23219-2000

Dear Ms. Clarke:

We are writing in reference to your March 17, 2020, Determination of Effect letter to the Virginia of Department of Historic Resources (VDHR) regarding the Virginia Department of Transportation (VDOT) proposed project to improve the I-495 corridor between the Dulles Toll Road and the George Washington Memorial Parkway interchange in the vicinity of the American Legion Bridge (I-495 NEXT). In this letter VDOT requested VDHR's review and concurrence to a No Adverse Effect determination for impacts on historic properties that fall within the project's revised Area of Potential Effect (APE) related to the I-495 NEXT project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended. The National Park Service (NPS) serves as a consulting party for this project due to the effects of the project on the George Washington Memorial Parkway (GWMP) and was copied on this letter.

The NPS has reviewed the project based on the information that was provided during a February 6, 2020, meeting and represented in a Visualizations Booklet with updated content provided on February 25, 2020.

The NPS concurs with VDOT's No Adverse Effect determination for the I-495 NEXT project provided that VDOT selects design option 1 (no retaining wall on NPS property), further minimizes the loss of forest, and mitigates the loss of forest. While option 1 provides the best solution to eliminating the introduction of new infrastructure design elements on NPS lands, option 1 has the greatest effect on the mature forest canopy, understory, and herbaceous plant community. The forest is a character defining feature for the GWMP, and the loss may never fully recover due to present day influences of invasive vegetation, difficulty in adapting to climate change, and lack of ecosystem resiliency even after replanting efforts. To minimize the loss of forest at this entrance to the GWMP, NPS would like VDOT to the extent possible reduce forest loss on their property as well as consider a different treatment of the walls on VDOT property. This would further diminish the effects of the project within this area, develop a harmonious transition of wall/barrier types complementary to the GWMP, and provide an appropriate entry experience for drivers approaching the Parkway from the Beltway.

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The NPS will provide further comment on the project through our review of the Environmental Assessment (EA) which is currently out for public review. We are very interested in what VDOT hears from the public regarding the alternatives that are include in the EA. Since the current COVID-19 pandemic has extended VDOT's process we look forward to hearing VDOT's plan to engage the public and further refine alternatives.

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We look forward to working with you and the rest of the VDOT team in refining the design to minimize and mitigate the impacts to the Parkway's historic landscape as this project progresses. If you have any questions or need additional information, you can contact either Matthew Virta, Cultural Resources

1 The VDOT design team worked closely with the NPS and consulting parties in order to develop a project that considers the setting and feeling of the GWMP. The goal behind the design is to minimize the visual and physical impact to the GWMP, while incorporating elements of design that creates a gateway entrance to the GWMP off I-495. Early in the Section 106 process, the NPS stated that a design clearly identifying the GWMP to drivers exiting I-495 was preferred. To meet this request, the design consultant presented a *George Washington Memorial Parkway Visualization Booklet* (the Booklet) at the February 6, 2020 consulting parties meeting. VDOT maintains that the design options presented in the Booklet minimize the effect of the I-495 NEXT project to the GWMP. While the proposed project may alter the setting and feeling of the GWMP, the project does not diminish any aspects of integrity that contribute to the significance of the resource. The VDOT presented the NPS an opportunity to review and comment on the four design options presented in the Booklet.

In an attempt to support the no adverse effect determination for the I-495 NEXT project, VDOT shall commit to the following conditions. The VDOT shall utilize Option 1, as described in the Booklet, at the entrance to the GWMP off I-495. The landscaping completed for the project shall meet NPS standards and specifications, apply the minimization and mitigations efforts requested by the NPS, as well as incorporate the results of the tree survey already completed for this project. VDOT shall consult with the NPS and consulting parties to ensure that the NPS-selected gateway design concept would avoid any adverse effects to the GWMP. VDOT shall develop a major milestones design review schedule in consultation with the Virginia SHPO, the NPS and other consulting parties. The major milestones design review schedule shall include at least two interim submissions for review.

The implementing regulations of Section 106 of the NHPA define an effect as an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the National Register" [36CFR800.16 (i)]. The effect is adverse only when the alteration of a qualifying characteristic occurs in a "manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" [36CFR800.5 (a)]. VDOT Cultural Resources staff have reviewed the plans for this project, which reflect VDOT's concerted efforts to minimize and avoid impacts to historic properties, as documented in part by the Booklet, and have determined that the project as proposed will alter but not diminish the integrity of historic properties within the project's APE. As such, VDOT has determined that the revised design of the I-495 NEXT Project would have No Adverse Effect on historic properties in accordance with 36 CFR 800.5(b), provided that conditions are imposed and implemented to avoid adverse effects on the GWMP (VDHR No.: 029-0228) and the Dead Run Ridges Archaeological District (44FX3922), as well as its contributing resources Archaeological Sites 44FX0374, 44FX0379, 44FX0389, and 44FX2430 (see discussion above and concurrence page). The Virginia Department of Historic Resources (DHR) has concurred with VDOT's determination of No Adverse Effect.

2 VDOT has held three public meetings, two question and answer sessions for the general public, two public hearings, 23 meetings with elected officials, 109 meetings with stakeholders and agencies, 22 meetings with homeowners associations, and 22 one-on-one meetings with property owners. The materials have been available online and in hard copy in several locations since February 2020, and the project team has been available for questions and comments via phone throughout the planning and design process. These public involvement opportunities exceed both FHWA and VDOT policies for this type of NEPA study. VDOT has developed a Revised EA based on comments from the public, NPS, and other agencies.

Program Manager via email at matthew_virta@nps.gov or phone at 202-439-7323 or Maureen Joseph, Chief of Resource Management, via email at maureen_joseph@nps.gov or phone 202-734-0932.

Sincerely,

Charles
Cuvelier

Date:
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Charles Cuvelier
Superintendent

cc:

VDOT – W. Moore
VDOT – A. Lerner
MD-SHA – S. Archer
VA-DHR – M. Holma
NPS-NCA - T. Stidham
NPS-GWMP – M. Joseph