



United States Department of the Interior

NATIONAL PARK SERVICE
George Washington Memorial Parkway
c/o Turkey Run Park
McLean, Virginia 22101

IN REPLY REFER TO:

C3821 (3301)

October 5, 2020

Abi Learner, P.E.
VDOT Northern Virginia District Office
4975 Alliance Drive
Fairfax, VA 22030

Re: NPS Comments on 495 Express Lanes Northern Extension Project Environmental Assessment

Dear Mr. Lerner,

The National Park Service (NPS) has reviewed the Virginia Department of Transportation (VDOT) I-495 Express Lanes Northern Extension Environmental Assessment (EA), which evaluates an extension of the Interstate 495 (I-495) Express Lanes along approximately three miles of I-495, also referred to as the Capital Beltway, from their current northern terminus in the vicinity of the Old Dominion Drive overpass to the George Washington Memorial Parkway (Parkway) in the McLean area of Fairfax County, Virginia. The purpose of the project is to reduce congestion, provide additional travel choices and improve travel reliability by extending the I-495 Express Lanes from the existing terminus of the I-495 Express Lanes to the Parkway interchange in the vicinity of the American Legion Bridge. The proposed improvements entail new and reconfigured express lane ramps and general-purpose lane ramps at the Dulles Interchange and tie-in connections to the Route 123/I-495 interchange. Because of the project's impacts to the Parkway, the NPS is serving as a cooperating agency on this project and has been coordinating with VDOT and offers the following general comments with detailed comments attached.

The Build alternative includes modifications to the I-495/Parkway interchange to allow for express lane access from I-495 to and from the Parkway. VDOT will need to acquire use of NPS property through Highway Easement Deed (HED). The amount of area required is yet to be determined and will necessitate a survey prior to the completion of the EA decision document and Final Section 4(f) Evaluation. The area from which the easement would be acquired abuts the existing GWMP eastbound lanes and incorporates the removal of vegetation necessary for the construction of the tie-in and fly-over ramps (located outside the GWMP boundary) associated with the I-495 NEXT Project. Additionally, in various locations along the existing GWMP, VDOT proposes to add new express lane tolling signage. VDOT has determined that the Build Alternative would require the permanent and temporary use of land from the Parkway and has proposed the impacts under Section 4(f) (23 CFR 774.17) as de minimis. At this time, the NPS cannot concur as this does not constitute a final determination by VDOT. The Final Section

4(f) Evaluation will need to be submitted to the Department of Interior for review once a final determination has been made.

The VDOT has determined under Section 106 of the National Historic Preservation Act a determination of No Adverse Effect with the concurrence of the Virginia State Historic Preservation Officer. The NPS concurred with VDOT's No Adverse Effect determination for the project in correspondence on April 29, 2020, provided that VDOT selected design option 1 (no retaining wall on NPS property), and 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 mature forest canopy understory, and herbaceous plant community. Vistas and viewsheds are among the most significant features of the Parkway, framed by mature forest canopy understory, and herbaceous plant community. The forest is a character defining feature for the Parkway 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 further minimize the loss of forest at this entrance to the Parkway, the NPS would like VDOT to explore reducing the forest loss on their property. In addition, the NPS recommends a different wall treatment on VDOT property, which complements the Parkway architecture. These two changes would create an appropriate entry experience for drivers approaching the Parkway from the Beltway and would protect the character of this historic resource.

We appreciate the on-going coordination with the VDOT project team. This collaboration has led to a significant reduction in impacts to the Parkway from the original alternatives explored. This process should continue as the design progresses and through the completion of the EA to further avoid and minimize impacts to the Parkway. This project will require the NPS to issue a permit and to work with VDOT and Federal Highway Administration in the development of a HED. These actions will require the NPS to adopt this EA and develop a NPS Finding of No Significant Impact.

We look forward to our work with the VDOT team in continuing to refine the design to further 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 Maureen Joseph, GWMP Chief of Resource Management, at maureen_joseph@nps.gov or 202-734-0932.

Sincerely,

Charles Date:
Cuvelier 2020.10.05
13:31:49 -04'00'

Charles Cuvelier
Superintendent

Attachment: NPS Comments on EA

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
1	NPS	General	EA	Clearly articulate the nature of the GWMP as a National Park Service unit especially in the introductory section and Section 3. NPS has a federal action and will adopt this EA as our own NEPA document so there should be language included that emphasizes the national importance of the GWMP.	Comment accepted; language will be added. In addition, NPS comments throughout will be addressed to allow NPS adoption of the EA. VDOT project NEPA team will coordinate with FHWA and NPS to update and issue a Revised EA to allow NPS to adopt the document.	NPS agrees
2	NPS	General	Mapping	Graphically depict the NPS lands differently than other parklands and open spaces. This EA will be adopted by NPS so it's important the lands are graphically depicted separately.	Comment accepted; figures will be revised to show NPS lands as distinct from other lands.	NPS agrees
3	NPS	General	EA	The resources impacted, limit of disturbance and no other mention of existing utilities infrastructure facilities. The study area and EA should mention the 230Kv power transmission line (Dominion 2029) along the wooded area where trees are anticipated to be impacted.	Comment partially accepted; while a detailed description of utilities will not be added within the study area because final design has not been completed, the utilities within the protected areas will be referenced to address comment.	NPS agrees
4	NPS	General	EA	Include in the introduction a discussion of the expected revenue for the P3 partner over time and how it will be shared with those who have been impacted by the construction on public land.	Comment partially accepted; the EA will be revised to note that there will be a P3 partner. Impacts to public land are mitigated and compensated in accordance with federal and state requirements through established processes and procedures. Virginia law restricts the use of toll revenue to uses that are reasonably related to or benefit the users of the toll facility.	NPS agrees
5	NPS	General	EA	Potomac Heritage Trail Designation - Please note that the official name of this trail is "Potomac Heritage National Scenic Trail". The evolving PHT network is managed by various governmental agencies and nonprofit organizations.	Comment accepted; text will be modified.	NPS agrees
6	NPS	General	General	In order for NPS to adopt this EA, somewhere in chapter 3 the park-specific impacts to GWMP need to be called out specifically	Comment accepted; text will be modified throughout Chapter 3.	Comment addressed
7	NPS	1-1	1.1	Need to mention within the project limits narrative the link to the Maryland project and ALB.	Comment accepted; text will be modified. It is important to note that the Virginia project is being coordinated with Maryland's project, but I-495 NEXT has independent utility and need.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
8	NPS	1-1	1.2 - General - Study Area	Replace the word "improvements" with "construction" or "project"	Comment accepted; text will be modified.	Comment addressed
9	NPS	1-4	1.2	Study Area - Add Georgetown Pike to this description - The auxiliary lanes on the outer loop connect to the GWMP and Georgetown Pike in Virginia.	Comment accepted; text will be modified.	Comment addressed
10	NPS	1-4	1.2	Study Area - Add clarification to the statement - The Scotts Run Nature Preserve is Fairfax County parkland.	Comment accepted; text will be modified.	Comment addressed
11	NPS	1-4	1.2	What does "open federal parkland" mean? Change this to "...is primarily National Park Service parkland associated with the GWMP to the east..."	Comment accepted; text will be modified.	Comment addressed
12	NPS	1-8	1.3.1	To be consistent with how other projects are listed please include timeline or schedule for the I-495 and I-270 Managed Lanes Study and EIS.	Comment accepted; text will be modified so information about the Maryland project is at the same level of detail as other projects, and the EA clarifies which projects are under VDOT purview.	Comment addressed
13	NPS	2-5	Other Roadway and Bicycle/Pedestrian Improvements	Consider updating the design drawings to prohibit passage beyond Live Oak Drive until the connection to the ALB shared use path is complete. Visitors should not be allowed to travel far along a path that dead ends.	Comment noted; the EA represents the full design, not Phase 1, so the graphics will not be revised, but the text will be modified to clarify that logical sections between interim termini will be available for use as they are opened.	Comment addressed
14	NPS	3-1	3.1.1	Replace the word "improvements" with "construction" or "project"	Comment accepted; text will be modified.	Comment addressed
15	NPS	3-6	Table - Section 4(f)	Build Alternative - "Final impacts to the GWMP are yet to be determined, but is within LOD." These impacts need to be determined and spelled out plainly for public comment.	Comment accepted; text and figures will be modified as needed for correctness and consistency to identify I-495 NEXT design and impacts, while still pointing to future design and permitting which will identify final design and impacts.	Comment addressed
16	NPS	3-8	Table - Water Quality	Please clarify. "The Potomac River is not within the LOD and is not expected to be impacted." The Potomac River is shown within the LOD is Fig. 3.1 and many other figures.	Comment accepted; text and figures will be modified as needed for correctness and consistency.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
17	NPS	3-8	Table - Floodplains	Build Alternative - "Approximately 60 acres of floodplains are located within the LOD. The project design would be consistent with federal policies and would not be a "significant encroachment;" therefore no increase in flood levels or probability of flooding are expected." What portion of this is NPS land?	Comment accepted; this information will be provided to NPS.	Comment addressed
18	NPS	3-9	Table - Wildlife and Habitat	Statement "edge habitat is low-quality." More information and context is needed to understand the meaning of "edge" and "low quality"	Comment accepted; additional text will be added.	Comment addressed
19	NPS	3-9	Table - Wildlife and Habitat	Existing Resource Summary - "A total of 68 species are likely to occur or are confirmed to occur within a 2-mile radius of the study area." This number is far too low. See citations of papers below that document the number of species in Turkey Run Park, including state listed species, species new to Virginia, and species new to science. Additionally 292 species of birds have been documented from GWMP. The majority of these pass through or nest in the project area. A survey of springtails in GWMP documented 145 species including 37 species new to science (many of which may occur in the project area). A survey of nematodes in GWMP documented 260 species including 30 species probably new to science.	Comment partially accepted; the list in the EA is only species within the study area (LOD), not within the entire GWMP. The additional information will be included in an appendix and will be referenced in the body of the EA.	Comment addressed
20	NPS	3-9	Table - Threatened, Endangered, and Special Status Species	Existing Resource Summary - Threatened, Endangered, and Special Status Species - These are only the federally listed species. See list of state listed species, species new to Virginia (more rare than state listed species because they were just documented from the state), and species new to science (generally documented from only a few sites in the world) that have been found in the project area.	Comment acknowledged; the conclusions in the EA are based on database research and field visits, following FHWA environmental document guidelines. See response above for means of providing listing of all species requested by NPS.	Comment addressed
21	NPS	3-9	Table - Threatened, Endangered, and Special Status Species	No Build Alternative - "No changes to populations of threatened or endangered species, or their respective habitats, would result." - Cite study supporting this claim.	Comment acknowledged; there would be no action with the No Build Alternative, and therefore no changes as a result of of this project. The No Build impact conclusions do not refer to other changes possible in the environment unrelated to the I-495 NEXT project. There is no specific study to reference.	Comment addressed

I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking

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22	NPS	3-14	3.2.2	Have a TBD for potential impacts to GWMP lands. Can you put an estimate of the acreage for permanent and temporary impacts to GWMP lands?	Comment accepted; text will be modified to reflect additional information that is now available. Impacts will be calculated as area within the permanent and temporary limits of the project, but will not be defined as "conversion" since easements or other agreements may be made. Further detail will be provided to NPS outside of the EA.	Comment addressed
23	NPS	3-17	3.4.3	Build alternatives have negative affects on the environment and these need to be stated here: reduced habitat, reduced water quality, risks to endangered species, reduced air quality due to increased traffic volume, reduced oxygen production due to tree loss, increased temperature of microclimate due to loss of canopy cover, etc. These are what need to be listed in this section.	Comment acknowledged; Section 3.4.3 is summarizing impacts to economic resources (e.g., travel time, employment). Reference to environmental impacts are not necessary here. These are covered elsewhere in the document.	This comment was dismissed because VDOT said it was not appropriate for section 3.4.3. However, VDOT's response states this comments is more appropriate for the "environmental impacts" section but did not say it would be reflected in the environmental impacts section. Please clarify?
24	NPS	3-17	3.5.1	GWMP is a National Park Service property, and should not be compared to the Scott's Run Nature Preserve and "parkland" but should be referred to and a National Park Service property and depicted differently on all graphics and referred to as a NPS property to elevate its importance.	Comment accepted; text will be modified.	Comment addressed
25	NPS	3-17	3.5.1	Maybe update this to say - "VDOT has coordinated and will continue to coordinate with both the Fairfax County Park Authority (FCPA) and the National Park Service (NPS) throughout development of this project and will continue to seek ways to minimize and mitigate the project's design."	Comment accepted; text will be modified.	Comment addressed
26	NPS	3-17	3.5.1	These aren't just recreational resources, there are natural and cultural resources. Please update accordingly.	Comment accepted; text will be modified.	Comment addressed
27	NPS	3-17	3.5.1	Last paragraph is a little confusing, state parkway + surrounding park land is NPS	Comment accepted; text will be modified.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
28	NPS	3-18	3.5.2	Are we sure this is what will be the direction for use of GWMP lands, property acquisition? I did not think this was the direction NPS provided. In an earlier part of the EA it stated that this is still being discussed. TBD	Comment accepted; this section of the EA assumed all property within the easement would be temporary, and all other property within the proposed right-of-way would be permanent acquisition. This section of the EA will be revised to differentiate for GWMP lands, and will include conclusions of the discussions if available at the time of completion of the revised EA. Parkland impacts could be described as converted, special use permit, or other designation. Table 3-2 will be revised.	Comment addressed
29	NPS	3-22	3.7	It seems like the APE for indirect effects should be stated as the "study area" as mapped on figure 3-5.	Comment accepted; Figure 3-5 will be revised to label the pink area (currently labeled as "Historic Architecture Area of Potential Effects") as the APE for indirect effects. The LOD is the APE for direct effects.	Comment addressed
30	NPS	3-22	3.7	Discuss character defining features of GWMP	Comment accepted; language will be added from the Cultural Landscape Report.	Comment addressed
31	NPS	3-24	3.7.2	This section needs to be updated with a determination of effect and plan for resolving adverse effects in greater detail.	Comment accepted; language will be added.	Comment addressed
32	NPS	3-23	Figure 3-5	The NPS property boundary and NRHP Listed Architectural Resources should be the same boundary. NPS can provide the correct GIS boundary file.	Comment accepted; figures will be revised.	Comment addressed
33	NPS	3-23	3.7.1	Add information in this section regarding--George Washington Memorial Parkway in addition to being on the National Register of Historic Places, the George Washington Memorial Parkway is designated as an official All-American Road (2005). An All-American Road must meet the same criteria as a National Scenic Byway, but possess multiple intrinsic qualities that are of national significance and the byway must be considered a destination and reason for travel unto itself. https://www.nps.gov/gwmp/learn/management/index.htm	Comment accepted; text will be modified to add reference to All-American Road.	Comment addressed
34	NPS	3-23	3.7.1	Need more information here to provide more description about the character defining features for the GWMP. NPS can provide language, if needed.	Comment accepted; language will be added from the Cultural Landscape Report.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

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35	NPS	3-23	3.7.1	Potomac Heritage National Scenic Trail and GWMP Interchange are the only items called out and they are the non-contributing features. If you are doing this, need to include the contributing features list then (see character defining features description that is needed as well)	Comment accepted; text will be modified to add reference to all contributing features. Text will also be added to Section 3.7 noting that the indirect APE accommodates a potential change in view resulting from the project.	Comment addressed
36	NPS	3-23	3.7.1	Georgetown Pike has the distinction of being the state's first scenic and historic byway, designated in 1974. Please include this information here.	Comment accepted; language will be added.	Comment addressed
37	NPS	3-25	3.8.1	Section 4(f) - Summary of the GWMP is inadequate. Need to include its protection of the Potomac River Gorge and the natural scenery within (forest vegetative community). This is from the park's Enabling Legislation.	Comment accepted; language will be added.	Comment addressed
38	NPS	3-26	3.8.1	Not Potomac Natural Heritage Trail. Please note that the official name of this trail is "Potomac Heritage National Scenic Trail". The evolving PHT network is managed by various governmental agencies and nonprofit organizations.	Comment accepted; text will be modified.	Comment addressed
39	NPS	3-26	3.8.1	The PHT will be impacted more so by the ALB project, but there is potential the trail connections to Scott's Run Nature Preserve will be impacted so PHT may be a 4(f) property.	Comment acknowledged; this will be addressed as part of Maryland's project to improve the ALB.	Comment addressed
40	NPS	3-29	Table 3-4	Can you put an estimate of the acreage for permanent and temporary impacts to GWMP lands?	Comment accepted; text will be modified to reflect additional information that is now available. Impacts will be calculated as area within the permanent and temporary limits of the project, but will not be defined as "conversion" since easements or other agreements may be made. Further detail will be provided to NPS outside of the EA.	Comment addressed
41	NPS	3-29	Table 3-4 and narrative	Just to be clear, the NPS has not agreed with this determination of de minimis impact to the GWMP	Comment accepted; the EA will capture the impacts and agreements known at time of completion, and text will be modified to more clearly represent status of those agreements.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
42	NPS	3-29	Table 3-4, Note	This note indicates that NPS will "issue VDOT a permit or a permanent easement within NPS lands for the construction of the I-495 NEXT Project." If there will be perpetual impacts to the GWMP as a result of this project, the NPS prefers that these be authorized through a highway easement deed that that FHWA would execute on behalf of the USA, in accordance with 23 USC 107. Thus, the easement would not be "issued by the NPS". It would be issued by the United States and executed by FHWA, on behalf of the United States, in accordance with 23 USC 107. NPS would prefer to authorize temporary construction impacts by a special use permit, which would be issued by GWMP.	Comment accepted; text will be modified to reflect additional information that is now available. Impacts will be calculated as area within the permanent and temporary limits of the project, but will not be defined as "conversion" since easements or other agreements may be made. Further detail will be provided to NPS outside of the EA.	Need to see EA to see how this comment was addressed.
43	NPS	3-30	3.9	Please consider verifying the first sentence of this section, specifically whether section 6(f) of LWCF concerns federal acquisitions, as it currently appears to suggest. Also consider verifying/clarifying the second sentence, concerning conversion, specifically whether the conversion provision applies to lands acquired/developed through State-side LWCF only and not the Federal side. This is not clear from the text as written.	Comment accepted; this text will be reviewed and revised as appropriate.	Comment addressed
44	NPS	3-36	General - Noise	Although they are not shown as being proposed, NPS is not in support of installing any noise barriers on NPS lands	NPS's comments on the EA will be captured in the Revised EA appendix. No change is needed within the body of the Revised EA.	Comment addressed
45	NPS	3-49	3.13	Why are the dynamic message boards mentioned in the VDOT EA in the vicinity of Dead Run? This is MDOT element that is not included or needed for the VDOT project. Remove reference to this sign and only refer to the one within the VDOT ROW off NPS lands if needed in this section of the EA.	Comment accepted; text and figures will be modified as needed for correctness and consistency.	Comment addressed
46	NPS	3-49	3.13.2	All Dynamic message signs requiring power or fiber will need separate Right of Way permits with NPS for the utility including its own survey and legal description for each permit.	Comment acknowledged; no change needed in the EA.	Comment addressed

I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
47	NPS	3-52	3.15	Existing Conditions - See list of citations below that describe the existing conditions in Turkey Run Park (GWMP). Cite these in this section and summarize each citation from the information given below.	Comment partially accepted; the list of citations will be added to Section 5 (References), and a short summary of the collective resources will be added to Section 3.	Additional papers have been published since NPS completed our review. One such publication documents more rare resources from Turkey Run Park. (such as the species of soldier beetle new to science and known in the world only from Turkey Run). This is further proof that Turkey Run Park (including the LOD) have innumerable resources, some not known from anywhere else in the world, and other still awaiting discovery, that could be destroyed by this construction.
48	NPS	3-52	3.15.1	Do not mention NPS lands in this context as a natural forest cover and its connection to the larger sensitive Potomac Gorge conservation area.	Comment partially accepted. The only reference to NPS in Section 3.15.1 is "Parks owned by the FCPA or NPS can be seen in Figure 3-13." This is in context of discussing parks and natural areas near the project.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
49	NPS	3-56	Table 3-11	This table only includes the federally listed species. Since NPS gives the same level of protection to state listed and federally listed species it should include the state listed species as well. Special emphasis should also be given to species newly documented from Virginia that are not state listed yet (due to newness of discovery) and to species that are new to science found in the study area. See below for a list of these species.	Comment partially accepted; the list in the EA is only species within the study area (LOD), not within the entire GWMP. The additional information will be included in an appendix and will be referenced in the body of the EA.	We will await the final EA review to determine whether the updated text acknowledges the potential of some of the rare resources being in the project area even though they were only documented in Turkey Run Park and not within the LOD specifically. Since we do not have a 100% survey of the LOD, there is a still a possibility that they could be within the LOD (VDOT has not proven to that they are not present). The only survey that has been completed is for plants MDOT project or VDOT - need to verify this with Brent before sending. Two species of state listed plants were found in the LOD (one being very common there). Are they going to survey for all the other species? How will they document that they are not there? Many of the species fly and so could come into the LOD between the time of the survey and construction. Other species (salamanders, snails, turtles, etc.) are less mobile and will be doomed by construction unless they are removed from the LOD.
50	NPS	3-62	3.18	Indirect impacts - how about views? Aren't views considered an indirect impact?	Comment accepted; views are accounted for in resource-specific direct impact discussions such as cultural resources and community impacts.	Comment addressed

I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking

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51	NPS	3-68	3.18.2	Cumulative impact discussion omits discussion of GWMP. As noted in Table 4.1, NPS had requested this information during agency scoping.	Comment accepted; language will be added.	Comment addressed
52	NPS	5-1	References	Include all of the references cited below in the References section starting on page 5-1.	Comment accepted; language will be added.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

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53	NPS	Virginia State listed species and their rankings documented from Turkey Run Park (GWMP)		<p>PLANTS - Arabis patens (spreading rockcress), S2 G3; Arabis shortii (Boechera dentata) (short's rockcress), S2 G5; Carex careyana (carey's sedge), S3 G4G5; Cerastium arvense var. velutinum (field chickweed), S2? G5T4?; Eriginea bulbosa (harbinger-of-spring), S3 G5; Erythronium albidum (white trout-lily), S2 G5; Floerkea proserpinacoides (false mermaid-weed), S3 G5; Hasteola suaveolens (Senecio suaveolens) (sweet-scented indian-plantain), S2 G4; Juglans cinerea (butternut), S3? G4; Maianthemum stellatum (starry false solomon's seal), S2 G5; Matteuccia struthiopteris (ostrich fern), S1 G5T5; Panax quinquefolius (american ginseng), S3S4 G3G4 LT; Phacelia covillei (coville's phacelia), S1 G3; Spartina pectinata (freshwater cordgrass), S2 G5; Valeriana pauciflora (pink valerian), S2 G4.</p> <p>ANIMALS -Stygobromus pizzinii (groundwater amphipod), S1S2 G2; Stygobromus sextarius (groundwater amphipod), S1 G1; Fontigens bottimeri (appalachian springsnail), S1S2 G2; Striatura milium (fine-ribbed striate), SU G5; Acronicta radcliffei (Radcliffe's dagger moth), S2S4 G5; Oligia (Neoligia) crytora (mantled brocade), S2S4; Orthosia revicta (subdued quaker moth), S2S4 G?; Sphinx franckii (franck's sphinx), S2S3 G4; Cordulegaster erronea (tiger spiketail), S3 G4; Hydropsyche hoffmani (A Caddisfly, Trichoptera), G3G4, S3; Ithytrichia clavata (A Caddisfly, Trichoptera), G5, S2S4; Mayatrichia ayama (A Caddisfly, Trichoptera), G5, S2S4; Ochrotrichia tarsalis (A Caddisfly, Trichoptera); Rhyacophila invaria (A Caddisfly, Trichoptera), G5, S2S4; Hydropsyche brunneipennis (A Caddisfly, Trichoptera), G3G4, S1S3; NOTE rare moth species may have larvae that feed on common plant species.</p> <p>Loss of the host plant can lead to loss of the rare moth. The host plants for the larvae of Acronicta radcliffei are hawthorns and prunus sps., for , Orthosia revicta they are various trees including poplar and cherry, for</p>	See above response.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
54	NPS	Citations for Number of Species and Number of New State Records Documented from Turkey Run Park. Use these to determine number of species in the project area and add them to the tables of rare species in the study area.		<p>1) Barrows, E.M. & D.R. Smith. 2014. Sawflies (Hymenoptera, Symphyta) of three Mid-Atlantic Parks in the George Washington Memorial Parkway, U.S.A. <i>Journal of Hymenoptera Research</i> 39:17-31. 115 species of sawflies in Turkey Run Park. One species, Kerita fidala, is NEW TO VIRGINIA. 2) Brattain, M. R., B. W. Steury, A. F. Newton, M. K. Thayer, and J. D. Holland. 2019. The rove beetles (Coleoptera: Staphylinidae) of the George Washington Memorial Parkway, with a checklist of regional species. <i>Banisteria</i> 53: 27-71. 125 species of rove beetles in Turkey Run Park. 25 species are NEW TO VIRGINIA. 3) Cavey, J.F., B.W. Steury, & E.T. Oberg. 2013. Leaf beetles (Coleoptera: Bruchidae, Chrysomelidae, Orsodacnidae) from the George Washington Memorial Parkway, Fairfax County, Virginia. <i>Banisteria</i> 41:71-79. 41 species of leaf beetles in Turkey Run Park. 4) Cohn, J.P. 2004. The wildest urban river: Potomac River Gorge. <i>BioScience</i> 54:8-14. This would be an excellent paper to cite in the Existing Conditions section. 5) Evans, A.V. & B.W. Steury. 2012. The Cicada Parasite beetles (Coleoptera: Rhipiceridae) of Virginia. <i>Banisteria</i> 39:65-70. 2 species of cicada parasite beetles in Turkey Run Park. One species, Sandalus petrophya, is NEW TO VIRGINIA. 6) Flint, O.S., Jr. 2011. Trichoptera from the Great Falls and Turkey Run units of the George Washington Memorial Parkway, Fairfax Co., Virginia, USA. <i>Zoosymposia</i> 5:101-107. 76 species of caddisflies in Turkey Run Park. Two species, Ceraclea resurgens and Polycentropus carlsoni are NEW TO VIRGINIA. See below for an additional species of caddisfly new to science from Turkey Run Park. 7) Steury, B.W. 2014. Aquatic snails (Gastropoda) from national park sites in northern Virginia and adjacent Maryland, with an updated checklist of regional species. <i>Banisteria</i> 44:13-18. 6 species of aquatic snails in Turkey Run Park, including the only GWMP record of the limpit</p>	See above response.	The citations for the new publications that should be included in the EA are: Steury, B.W. 2020. <i>Cantharis sheraldi</i> Steury (Coleoptera: Cantharini), a New Species of Soldier Beetle from Virginia, USA. <i>The Coleopterists Bulletin</i> 74(3): 601-604; Steury, B.W., & R.M. Brattain. 2020. Six rove beetles (Coleoptera: Staphylinidae) new to Virginia. <i>Banisteria</i> 54: N4-N13.

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
55	NPS	Citations for Number of Species and Number of New State Records Documented from Turkey Run Park - Continued from above		<p>8) Steury, B.W. 2017. First record of the rove beetle <i>Trigonodemus striatus</i> LeConte (Coleoptera: Staphylinidae) from Virginia and additional new park records (Coleoptera: Anthicidae, Buprestidae, Carabidae, Cerambycidae, Chrysomelidae) for the George Washington Memorial Parkway. Banisteria 48:14-16. One species, <i>Trigonodemus striatus</i>, is NEW TO VIRGINIA. 9) Steury, B. W. 2018. Annotated checklist of some fungivorous beetles (Coleoptera: Anamorphidae, Biphyllidae, Derodontidae, Endomychidae, Erotylidae, and Tetratomidae) of the George Washington Memorial Parkway. Banisteria 50: 21-28. 27 species of fungus beetles in Turkey Run Park. Four species, <i>Tritoma erythrocephala</i>, <i>Microsternus ulkei</i>, <i>Tritoma mimetica</i> and <i>Hallomenus scapularis</i>, are NEW TO VIRGINIA. 10) Steury, B. W. 2018. Four longhorned beetles (Coleoptera: Cerambycidae) new to Virginia and additional new park records (Coleoptera: Anthicidae, Buprestidae, Cantharidae, Carabidae, Cerambycidae, Chrysomelidae) for the George Washington Memorial Parkway. Banisteria 50: 29-31. One species, <i>Obrium rubidum</i>, from Turkey Run Park NEW TO VIRGINIA. 11) Steury, B. W. 2019. The ant-like leaf beetles (Coleoptera, Aderidae) of the George Washington Memorial Parkway, Fairfax County, Virginia. Banisteria 52: 46-49. Four species of ant-like leaf beetles from Turkey Run Park including the FIRST VIRGINIA RECORD of <i>Aderus brunnipennis</i>. 12) Steury, B.W., J. Glaser, & C.S. Hobson. 2007. A survey of macrolepidopteran moths of Turkey Run and Great Falls National Parks, Fairfax County, Virginia. Banisteria 29:17-31. 222 moth species documented from Turkey Run Park including the FIRST VIRGINIA RECORD of <i>Abrostola urentis</i>. 13) Steury, B. W. & J. M. Leavengood, Jr. 2018. Annotated Checklist of Checkered Beetles from the George Washington Memorial Parkway,</p>	See above response.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
56	NPS	Citations for Number of Species and Number of New State Records Documented from Turkey Run Park - Continued from above		<p>15) Steury, B.W. & T.A. Pearce. 2014. Land Snails and Slugs (Gastropoda: Caenogastropoda and Pulmonata) of two National Parks along the Potomac River near Washington, District of Columbia. <i>Banisteria</i> 43:3-20. 22 species of land snails and slugs in Turkey Run Park. 16) Steury, B.W. & T.C. MacRae. 2014. The longhorned beetles (Insecta: Coleoptera: Cerambycidae) of the George Washington Memorial Parkway. <i>Banisteria</i> 44:7-12. 37 species of longhorned beetles in Turkey Run Park. Four species, <i>Centrodera decolorata</i>, <i>Trachysida mutabilis</i>, <i>Clytus ruricola</i>, and <i>Saperda puncticollis</i> are NEW TO VIRGINIA. 17) Steury, B.W., T.C. MacRae, & E.T. Oberg. 2012. Annotated list of the metallic wood-boring beetles (Insecta: Coleoptera: Buprestidae) of the George Washington Memorial Parkway, Fairfax County, Virginia. <i>Banisteria</i> 39:71-75. Five species of metallic wood-boring beetle are documented from Turkey Run Park. 18) Steury, B.W, W.E. Steiner, Jr., & F.W. Shockley. 2018. The soldier beetles and false soldier beetles (Coleoptera: Cantharidae and Omethidae) of the George Washington Memorial Parkway. <i>The Maryland Entomologist</i> 7:11-27. 14 species of soldier beetles in Turkey Run Park. Seven species are First Records for Virginia.</p>		Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
57	NPS	Species New to Science from Turkey Run Park. These are species newly discovered and described by science that occur in the project area.		1) Flint, O.S., Jr. & K.M. Kjer. 2011. A new species of <i>Neophylax</i> from northern Virginia, USA (Trichoptera: Uenoidae). <i>Proceedings of the Entomological Society of Washington</i> 113:7-13. A new species of caddisfly from Turkey Run Park, <i>Neophylax virginica</i> . 2) Holsinger, J.R. 2009. Three new species of the subterranean amphipod crustacean genus <i>Stygobromus</i> (Crangonyctidae) from the District of Columbia, Maryland, and Virginia. Pp. 261-276 In S. M. Roble and J. C. Mitchell (eds.). <i>A Lifetime of Contributions to Myriapodology and the Natural History of Virginia: A Festschrift in Honor of Richard L. Hoffman's 80th Birthday</i> . Virginia Museum of Natural History Special Publication No. 16, Martinsville, VA. A new species of amphipod from Turkey Run Park, <i>Stygobromus sextarius</i> . 3) Mathis, W. N., K.V. Knutson & W.L. Murphy. 2009. A new species of the snail-killing fly of the genus <i>Dictya</i> Meigen from the Delmarva States (Diptera: Sciomyzidae). <i>Proceedings of the Entomological Society of Washington</i> 111(4): 785-794. A new species of fly from Turkey Run Park, <i>Dictya orthi</i> . 4) Mathis, W. N. & T. Zatzwarnicki. 2010. New species and other taxonomic modifications for shore flies from the Delmarva States (Diptera: Ephydriidae). <i>Proceedings of the Entomological Society of Washington</i> 112: 97-128. 4 new species of flies from Turkey Run Park, <i>Hydrochasma aquia</i> , <i>H. avanae</i> , <i>H. garvinorum</i> (Dead Run Mouth), and <i>Allotrichoma deonieri</i> .	See above response.	Comment addressed
58	NPS	Appendices	Table 3.1	de minimis determination is pre-decisional at this point and can not be known and thus should not be stated.	Comment accepted; See previous response above - text will be modified. If a 4(f) conclusion is made before the Revised EA is completed, these sections will be revised again.	Comment addressed
59	NPS	Appendices	9	Features and functions: Add description of the Potomac Gorge and its values to wildlife using citations below.	Comment accepted; language will be added.	Comment addressed
60	NPS	Appendices	10	Unusual characteristics: Add Potomac Gorge	Comment accepted; language will be added.	Comment addressed
61	NPS	4(f)	General	Section 4f references and easement that would likely be acquired. Text should indicate that this will be a Highway Easement Deed and that the 4f and the NEPA need to cover this action.	Comment accepted; language will be added.	Comment addressed

I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
62	NPS	4(f)	General	Impacts to the GWMP have not been quantified within the Section 4f while they were quantified for Scott's run.	Comment accepted; text will be modified to reflect additional information that is now available.	Comment addressed
63	NPS	4(f)	General	The EA and the 4f must be submitted to DOI for concurrence on the 4f determination. Without the impacts outlined, this cannot happen	Comment accepted; text will be revised to include impacts.	Comment addressed
64	NPS	4(f)	General	Needs more detailed information about the historic resources for the GWMP. Provide more description about the character defining features for the GWMP	Comment accepted; language will be added.	Comment addressed
65	NPS	4(f)	General	To the extent any temporary construction uses will occur on NPS lands, NPS's preference would be to authorize these uses through special use permits. If appropriate, you might consider, throughout the document, revising references to "temporary construction easements" or "temporary easements for construction" so as to include, reference construction permits or permits for construction.	Comment accepted; text will be modified.	Comment addressed
66	NPS	4(f), page 5	3.1	In bullet point re: GWMP, second line, technically the lands are owned by the United States and administered by the NPS. Suggest revising to: "...are owned by the United States and administered by the National Park Service (NPS)...".	Comment accepted; text will be modified.	Comment addressed
67	NPS	4(f), page 5	3.1	Has NPS been given the opportunity to verify the acreage (~4.7 ac) of the proposed LOD impacting NPS lands, such as through independent verification of the intersection of the project LOD shapefile with NPS's tract and boundary shapefile? If not, can this please be arranged?	Comment accepted; text will be modified to reflect additional information that is now available. Impacts will be calculated as area within the permanent and temporary limits of the project, but will not be defined as "conversion" since easements or other agreements may be made. Further detail will be provided to NPS outside of the EA.	NPS will look at the writeup in the EA to see how this comment has been address. If possible, please send NPS shapefiles for LOD.
68	NPS	4(f), page 9	3.2.1	In paragraph addressing "Ownership and type of Section 4(f) property": Technically the lands are owned by the United States and administered by the NPS. Suggest revising to: "...are owned by the United States and administered by the National Park Service (NPS)...".	Comment accepted; text will be modified.	Comment addressed
69	NPS	4(f), page 9	3.2.1	In paragraph addressing "Clauses affecting ownership": Again, land within the GWMP is owned by the United States and administered by the National Park Service. Please clarify the second sentence, the meaning is not clear.	Comment accepted; text will be modified.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
70	NPS	4(f), page 17	3.2.6	Recreational Area Impacts - Scenic Driving is considered a recreational use for the parkway. The full intent of designing the parkway was for the recreational scenic driving experience. The project will impact that experience if the entry area is marred by new features that are incompatible with the parkway character and if the forested vegetative community is impacted to build the new lanes (regrading the slopes that are vegetated).	Some mitigation is already proposed (such as revegetating the areas that are proposed to be cleared as part of the I-495 NEXT project). These mitigation measures will address concerns regarding impacts to vegetation, which is a part of the GWMP landscape.	Comment addressed
71	NPS	4(f), page 17	3.2.6	The characterization of GWMP as "a public land holding" seems a little awkward, unless this is a term of art. Would Federal parkland be acceptable substitute? Or a unit of the National Park System?	Comment accepted; text will be modified if appropriate.	Comment addressed
72	NPS	4(f), page 18	3.2.6	NPS continues to have on-going dialog with VDOT to reduce the removal of vegetation at the entry to the GWMP and on VDOT lands, to support a no adverse effect Section 106 finding.	Comment accepted; text will be modified if needed based on conclusions of discussions.	Comment addressed
73	NPS	4(f), page 18	3.2.6	In the first paragraph of the first bullet point, discussion of the proposed future easement is awkwardly and/or incorrectly written in several places. First, Figure 7 only depicts the LOD where it intersects with the GWMP boundary; it doesn't specifically address where easements might be conveyed for perpetual impacts or where special use permits might be conveyed for temporary construction impacts. Second, the text suggests that the project will "acquire an easement from the GWMP". If there will be perpetual impacts to the GWMP as a result of this project, the NPS prefers that these be authorized through a highway easement deed that FHWA would execute on behalf of the USA, in accordance with 23 USC 107. Thus, the easement would not be "from the GWMP". It would be from the United States and executed by FWHA, on behalf of the United States, in accordance with 23 USC 107. Third, one does not speak of the "amount" of an easement or "easement amounts." It would be more appropriate to reference the "area" and the "terms" of the proposed easement. Finally, the sentence about the area of the easement being determined through ongoing coordination with NPS should be revised to also include reference to a land survey.	Comment accepted; text and figures will be modified as needed for correctness and consistency to address highway easement deed.	Comment addressed

**I-495 VDOT Express Lane Extension Environmental Assessment
NPS Comment Tracking**

ID	Reviewer	Page	Section	NPS Comment	VDOT Response (1/11/21)	NPS Review 1/20/2021
74	NPS	4(f), page 18	3.2.6	In the second paragraph of the first bullet point, rewrite so that references are to "easements in land" and not "easements from an area". Also, this paragraph doesn't demonstrate a clear and explicit understanding that express lane tolling signage installed on GWMP lands will also require authorization through an easement.	Comment accepted; text will be modified.	Comment addressed
75	NPS	4(f), page 18	3.2.6	In the third paragraph of the first bullet point, discussion of "equipment access on GWMP" land should in some way reference the need for a special use permit, or that such access would be in accordance with a special use permit issued by GWMP.	Comment accepted; text will be modified.	Comment addressed
76	NPS	4(f), page 19	3.2.6	Please refer to the GWMP latest correspondence 4/27/2020 on minimizing and mitigating impacts to GWMP resources.	Comment accepted; text will be modified.	Comment addressed
77	NPS	4(f), page 21	Figure 7	Please indicate on Figure which signs are VDOT project signs. Only the DMS sign is for VDOT. All the others are from MDOT.	Comment accepted; figures will be revised.	Comment addressed
78	NPS	4(f), page 28	4.1	Please consider verifying/clarifying the sentence concerning conversion, specifically whether the conversion provision applies to lands acquired/developed through State-side LWCF only and not the Federal side. This is not clear from the text as written b/c the preceding sentence references both federal and state-side acquisition.	Comment accepted; text will be modified.	Comment addressed
79	NPS	4(f), page 30	5.0.	Please verify the first citation to LWCF section 6(f).	Comment accepted; citation will be verified.	Comment addressed