



**Rock Creek Park  
Washington, D.C.**

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**FINDING OF NO SIGNIFICANT IMPACT  
Metropolitan Branch Trail  
Rock Creek Park  
Washington, D.C.**

The District Department of Transportation (DDOT), in conjunction with the Federal Highway Administration (FHWA) and the National Park Service (NPS), proposes to construct and maintain part of the Metropolitan Branch Trail (MBT) on NPS land managed by Rock Creek Park as part of the Civil War Defenses of Washington (CWDW).

The purpose of this action is to connect the MBT system and augment the Fort Circle Parks Trail System<sup>1</sup>, while ensuring the protection of NPS cultural and natural resources. The project is needed because: 1) the MBT, a component of the regional multi-use trail system, will not be complete without the proposed trail; 2) the trail is called for in the Fort Circle Management Plan/Environmental Assessment (2003); 3) Fort Totten currently lacks adequate pedestrian and bicycle access; and 4) at present, there is no connection from the East Coast Greenway in Prince George's County, Maryland to the National Mall.

FHWA and DDOT, in cooperation with NPS, have prepared an Environmental Assessment (EA) for this project. The EA was written in accordance with the National Environmental Policy Act of 1969 (NEPA), the Council of Environmental Quality (CEQ) regulations (40 CFR 1500-1508), NPS Director's Order #12, FHWA's Environmental Impact and Related Procedures (23 CFR 771), and Section 106 of the National Historic Preservation Act of 1966 (NHPA) and its implementing regulations (36 CFR Part 800 Protection of Historic Properties). The EA analyzed impacts of project alternatives on NPS land. On November 15, 2010, DDOT and FHWA released a Draft EA for 30 days of public review and comment. A Final EA that addressed all agency and public comments was released on July 14, 2011.

The proposed project consists of constructing and maintaining three MBT segments. Segments 6 and 7 cross NPS land near Fort Totten and the Mamie D. Lee Community Garden, while Segment 8 borders NPS land near the intersection of Eastern Avenue and Piney Branch Road, NE. These three segments would become part of the eight-mile MBT, which connects Silver Spring, MD, to Union Station in Washington, D.C. The completed MBT, several segments of which already have been constructed, will consist of a variety of trail types, including shared roads, striped bicycle lanes, shared sidewalks, and off-street shared paths. The MBT will link to other regional and national trails, and provide recreational and commuting alternatives to surrounding communities.

On NPS property, the MBT will be 10 feet wide and paved. Signage, trail markings, lighting, and call boxes that comply with NPS standards may be installed as needed, after NPS approval. Similarly, waysides with seating and shade may be installed at appropriate locations, such as the area overlooking the Fort Totten Metrorail tunnel and to the east and west of the Mamie D. Lee Community Garden. All construction will be consistent with the Fort Circle Parks Management Plan/Environmental Assessment (2003).

After consultation with DDOT and FHWA<sup>2</sup>, and following a review of the EA, the NPS, in accordance with 43 CFR 46.320, is adopting the EA. The EA fulfills the requirements of NEPA and its applicable

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<sup>1</sup> CWDW was previously known as the Fort Circle Parks. CWDW and Fort Circle Parks are used interchangeably in this document.

<sup>2</sup> In 1977, FHWA approved a Negative Declaration/Section 4(f) Statement for Independent Bikeways or Walkway Projects. The Negative Declaration eliminates the reporting requirement for FHWA to prepare a separate Section 4(f) statement for Independent Bikeways or Walkway Projects occurring in parks or recreation areas. Consequently, a separate Section 4(f) statement is not required to construct the MBT on NPS land as described herein.

regulations. It also meets the policies set forth in the NPS's Director's Order 12, Conservation Planning, Environmental Impact Analysis and Decision-Making, and its accompanying Handbook. The NPS will issue a Special Use Permit for construction of the MBT on NPS land, as described in this FONSI.

### **NPS SELECTED ALTERNATIVE**

As shown in the Final EA, the MBT is divided geographically into nine segments, three of which (Segments 6-8) affect NPS land. Proposed alternatives are described for each of these three segments (A1-A4 for Segment 6, B1-B2 for Segment 7, and C1-C3 for Segment 8), and the overall NPS selected alternative is a combination of three alternatives – one from each segment.

The NPS selected alternative is A1 for Segment 6, B2 for Segment 7, and C1 for Segment 8. This combination of alternatives provides continuous trail access while minimizing impacts to parkland. It utilizes existing roads and sidewalks where feasible, creates continuous sidewalks where gaps exist, and provides off-street connections where necessary:

- **Alternative A1** (North/South alignments north of the Fort Totten Metrorail Station): This alternative will use existing roadways and sidewalks from Kansas Avenue, NE to 1<sup>st</sup> Place NE, then connect to a proposed off-road, multi-use trail through NPS land.<sup>3</sup>

The proposed new, off-road, multi-use trail will start at 1<sup>st</sup> Place NE and pass through approximately 1,000 feet of Fort Totten on the west side of the Metrorail tunnel embankment. The trail will then turn (first east and then south) near the Fort Totten Metrorail Station and run parallel along the west side of the Metrorail and CSX tracks. This proposed new trail segment will pass through portions of Fort Totten previously disturbed by the construction of the Metrorail system, and will remain approximately 1,000 feet away from historic Fort Totten earthworks and several hundred feet away from the Mamie D. Lee Community Garden. This parkland is characterized by wooded landscape populated almost entirely by invasive, non-native plant species.

- **Alternative B2** (Prince George's County Spur from Fort Totten Metrorail Station to Prince George's County line): this alternative will use existing roads and sidewalks primarily, but will also include a new trail through parkland.

This alignment will use a shared sidewalk along Galloway Street, NE to South Dakota Avenue, NE.<sup>4</sup> From South Dakota Avenue, NE, the trail will move to the street, running south and then turning west along Gallatin Street, NE. At a point roughly opposite 16<sup>th</sup> Street, NE and southeast of St. Anne's Infant and Maternity Home, the trail will turn northeast and pass through approximately 220 feet of NPS land on a new, off-street, multi-use path to join with existing Prince George's County trails. This parkland is characterized by a grassy field that transitions to woods.

- **Alternative C1** (North/South alignments between Cedar Street, NE and the Prince George's County line): This alternative will use existing roadways and sidewalks along Eastern Avenue. Unlike other alternatives for this segment of the MBT, Alternative C1 will not involve construction of a trail on NPS land.

DDOT will construct the MBT on NPS land subject to a Special Use Permit and design review/approval from the NPS. After construction, MBT segments on NPS land will be maintained by DDOT under an agreement with the NPS.

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<sup>3</sup> Alternative A1 is presented with an amendment from the Environmental Assessment. The NPS selected alternative remains on 1<sup>st</sup> Street, NE and does not utilize an existing social trail passing to the east of private residences between Riggs Road, NE and Kennedy Street, NE.

<sup>4</sup> At present, this sidewalk is not continuous along Galloway Street, NE. The NPS supports making it so. However, this segment of proposed trail is not on NPS land.

## OTHER ALTERNATIVES CONSIDERED

In addition to the NPS selected alternative, the EA analyzed a no action alternative and multiple alternatives within each trail segment.

**No Action:** Under the no action alternative, DDOT would not construct the MBT on NPS property. The MBT would remain incomplete until a non-park route alternative was developed, the Fort Circle Parks Management Plan/Environmental Assessment (2003) would go unfulfilled, Fort Totten would continue to lack adequate pedestrian and bicycle access, and there would be no connection from the East Coast Greenway in Prince George's County, Maryland to the National Mall.

**Segment A:** In addition to Alternative A1, there are three alternative alignments that differ in how they reach an end point at the intersection of Oglethorpe Street, NE and Blair Road, NE.

**Alternative A2** is identical to alternative A1 with the exception of the proposed trail section between Riggs Road, NE and Madison Street, NE. Instead of using the 1st Street, NE route, Alternative A2 would proceed to Madison and 1st Streets, NE via wooded NPS land paralleling the CSX tracks. This alternative was not selected because it would cause a greater adverse impact on natural resources than the selected alternative (A1).

**Alternative A3** differs from Alternative A1 by proceeding down South Dakota Avenue, NE (instead of McDonald Place, NE) and on the service road through the Mamie D. Lee Community Garden to Oglethorpe Street, NE, then to Blair Road, NE on Oglethorpe Street, NE. This alternative was not selected because it would cause a greater adverse impact on existing community uses and natural resources than the selected alternative (A1).

**Alternative A4**, like alternative A2, would proceed through the wooded area on NPS land adjacent to the CSX tracks to Madison and 1st Streets, NE, down South Dakota Avenue, NE (instead of McDonald Place, NE) and on the service road through the Mamie D. Lee Community Garden to Oglethorpe Street, NE and to Blair Road, NE on Oglethorpe Street, NE. This alternative was not selected because it would cause a greater adverse impact on existing community uses and natural resources than the selected alternative (A1).

**Segment B:** In addition to Alternative B2, there is **Alternative B1**. It differs from Alternative B2 by proposing to construct a new 12-foot hard surface path on NPS land adjacent to Gallatin Street, NE, terminating at the Prince George's County Border. This alternative was not selected because it would cause a greater adverse impact on natural resources than the selected alternative (B2).

**Segment C:** In addition to Alternative C1, there are two alternative alignments that cross NPS Reservation 531, at the intersection of Eastern Avenue and Piney Branch Road, NE.

**Alternative C2** would cross Piney Branch Road, NE on a bridge to the west of the tracks (to be constructed) or descend to Piney Branch Road, NE using a switchback alignment. Stairs on both sides of Piney Branch Road, NE were also proposed. Depending on the option selected, the trail would proceed by sidewalk along the north or south side of Piney Branch Road, NE past the Cady-Lee Mansion. This alternative was not selected because it would cause a greater adverse impact on natural resources than the selected alternative (C1).

**Alternative C3** would follow a path on an elevated structure adjacent to the Metrorail tracks, running behind cooperative apartments on Eastern Avenue and the Cady-Lee Mansion. The trail would pass between the Metrorail tracks and the Cady-Lee Mansion, crossing Piney Branch Road, NE on a newly-constructed bridge. This alternative was not selected because it would cause a greater adverse impact on natural resources than the selected alternative (C1).

## **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

The NPS is required to identify the Environmentally Preferable Alternative in its NEPA documents. The NPS, in accordance with DOI and NPS policies and guidance and CEQ's NEPA's Forty Most Asked Questions, defines the Environmentally Preferable Option as the one that "causes the least damage to the biological and physical environment." It is the alternative "which best protects, preserves, and enhances historic, cultural and natural resources."

After a thorough review of the Final EA, the NPS identifies the no-action alternative as the Environmentally Preferred Alternative. Any trail system constructed on NPS land will adversely impact natural resources and cultural resources, although in negligible or minor ways in this case, whereas doing nothing will not have an adverse impact on these resources.

## **MITIGATION MEASURES**

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures will be implemented as part of the selected alternative (These measures will appear as conditions of the Special Use Permit issued by the NPS.) .

### **Soils**

- Use of a DDOE-approved erosion and sediment control plan, including use of silt fences and hay bales.

### **Vegetation**

- Revegetate areas disturbed during construction with native plant species.
- Within the project's limits of disturbance (LOD), encircle trees with snow fencing along their drip lines. This will prevent heavy equipment from damaging the trees' root zones.
- Use of boardwalks in areas where large tree roots could be impacted endangered to prevent the roots from being damaged by foot and/or bike traffic.

### **Wildlife**

- New lighting in or around natural areas will be avoided if possible. If lights are used, they will be directed downward onto the trail to reduce light pollution that might disrupt wildlife.

### **Cultural Resources**

- If archeological resources are discovered on NPS property during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy developed. Consultation with the DC SHPO, NPS staff, and/or the NPS Regional Archeologist will be coordinated to ensure resources are protected. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 will be followed.
- The trail design will include measures that deter off trail bike use (i.e., signage and/or fencing) that could damage earthworks.

### **Viewsheds**

- Signage, trail markings, lighting, and call boxes will comply with NPS standards.

### **Visitor Use and Experience**

- Outdoor recreation accessibility standards will be followed, including the Rehabilitation Act (1973) and Americans with Disabilities Act (1990), where applicable, in order to minimize impacts on natural (currently unpaved) portions of parkland.
- Disruptions to visitor use and enjoyment of park land will be minimized by not permitting trail construction work to occur on weekends and evenings and/or mandating that staging areas on park land are small and fenced.

- DDOT will provide and maintain proper signs, barricades and/or other means of warning the general public of dangers inherent in the project.

The NPS will include other conditions in the Special Use Permit as needed, and the NPS will implement an appropriate level of monitoring throughout the construction process to ensure that protective measures are properly carried out and achieving their intended results.

### **WHY THE SELECTED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT**

As documented in the EA, the NPS determined that the NPS selected alternative, Alternatives A1, B2 and C1, can be implemented without significant adverse effects. As defined in 40 CFR §1508.27, significance is determined by examining the following criteria:

***Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial, but that may still have significant adverse impacts that require analysis in an Environmental Impact Statement (EIS):*** No significant adverse impacts were identified. The selected alternative will not have greater than minor adverse impacts on soils, vegetation, wildlife, cultural resources, viewsheds, land use, or visitor use and experience. In addition, the project will have several beneficial impacts, such as encouraging recreation on NPS lands and facilitating connectivity among neighboring communities and from those communities to mass transit. The NPS selected alternative may also raise the visibility of the CWDW by encouraging community members to visit Fort Totten via walking or cycling.

**Soils:** The selected alternative will cause minor, adverse, short- and long-term impacts to previously disturbed soils from the construction of approximately 1,000 feet of paved trail. Removal of vegetation during site preparation could cause erosion, particularly around the Fort Totten Metrorail tunnel and moderately steep, wooded slopes just to the north of the tunnel. In addition there will be minor, adverse, short- and long-term impacts to soils from placement of fill, compaction, mixing, and augmentation of soils to accommodate 220 feet of new trail to the southeast of St. Anne's Home.

**Vegetation:** There will be long-term minor impacts to vegetation. To the south of the Metrorail tunnel, vegetation in the path of the trail, consisting of invasive, non-native plant species, will be removed. To the north of the tunnel, the trail passes through a wooded area, requiring the removal of several invasive, non-native trees. To the north of the wooded area, workers will remove maintained grass species to accommodate the trail. In addition, minor long-term adverse impacts to vegetation will occur under as a result of 220 feet of new trail will pass through a wooded area to the southeast of St. Anne's Home before connecting with an existing trail near the DC/MD border. This will require the removal of no more than two trees, depending on the trail alignment. Negligible impacts to vegetation will occur under Alternative C1, as the trail will be aligned on existing sidewalks or streets. The only removal of vegetation for this alternative would be associated with the installation of interpretive waysides. To mitigate these impacts, where tree roots are present along the trail, mitigation will consist of boardwalks and/or root pruning. Also, vegetated areas removed because of the trail will be replanted with native species and maintained to ensure native species' establishment following construction. Erosion and sediment control practices will also be implemented to minimize potential for the spread of invasive species resulting from development of the trail.

**Wildlife:** Alternatives A1 and B2 will cause negligible, adverse, short- and long-term impacts to wildlife. Although trail construction will remove some trees that provide wildlife habitat north of the Metrorail tunnel and southeast of St. Anne's Home, the affected species are adapted to urban environments. These species will likely move to adjacent wooded habitats during trail construction and return following construction, although less mobile species could be killed or injured by construction equipment. Under Alternative C1, wildlife could endure minor, long-term impacts from new lighting, although such lighting in or around natural areas will be avoided if possible and, if used, directed downward onto the trail to reduce light pollution.

**Cultural Resources:** Alternative A1 will have negligible, adverse, short-term impacts on cultural and historic resources, as the MBT will be constructed 1,000 feet from the earthworks of Fort Totten and near the cultural management zone for Fort Totten. Under Alternative A1, the MBT will be situated in areas that have been severely graded and disturbed to accommodate previous construction of the Fort Totten Metrorail station and residential development. This disturbance makes it unlikely that subsurface resources are present. However, if archeological resources are discovered on NPS property during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented and an appropriate mitigation strategy developed in consultation with the DC SHPO, NPS staff, and/or the NPS Regional Archeologist. There are no known cultural resources within the Alternative B2 study area. Within the Alternative C1 study area, Cady-Lee Mansion, listed on both the National Register of Historic Places and D.C. Historic Landmarks, is situated at the corner of Piney Branch Road, NE and Eastern Avenue. Construction in the vicinity of the Cady-Lee Mansion will entail, at most, sidewalk widening, a wayside across the street, and crossing improvements, minor short- and long-term impacts.

**Viewsheds:** Alternative A1 will cause negligible long-term adverse impacts by slightly altering a viewshed that is an urban mix of single-family residences, commercial establishments, and public services such as the Fort Totten Metrorail station, and that does not provide a high point for views and vistas. Alternative B2 will cause negligible long-term adverse impacts by slightly altering a viewshed of forested land, is surrounded by the local transportation network and single-family residences, and does not provide a high point for views and vistas. Alternative C1 will cause negligible long-term adverse impacts by slightly altering a viewshed that comprises the local transportation network and single-family residences, as well as the Cady-Lee Mansion. Under Alternative C1, the MBT will be obstructed from the viewpoint of the Mansion by the Metrorail tracks and/or topography. Trail lighting throughout will come from existing street lights, and any additional lighting will be in character with existing lighting systems and surrounding cultural resources. Further, signage, trail markings, lighting, and call boxes on NPS land will comply with NPS standards.

**Land Use:** Alternative A1 will have minor long-term adverse impacts on land use. Under this alternative, the MBT will cross two NPS Fort Circle Parks management zones: the Natural Zone and the Recreational Zone. Under the Fort Circle Parks Management Plan, trails are appropriate within Natural and Recreational Zones, although the plan recommends that trails within Natural Zones remain unpaved. However, in light of current transit-oriented land uses surrounding the Fort Totten Metrorail station, the trail under Alternative A1 will be paved, an impact lessened by extensive prior land disturbance in the area. Alternative B2 will have no adverse impacts to land use. Under this alternative, DDOT will construct 220 feet of trail on parkland within a Connecting Corridor Zone, which the Fort Circle Parks Management Plan states was purchased for construction of a trail system connecting Fort Circle Parks resources. No adverse impacts to the use of NPS land will occur under Alternative C1 because the trail will follow sidewalks and roadways.

**Visitor Use and Experience:** Under Alternatives A1, B2, and C1, access to some NPS lands may be temporarily disturbed during the construction process, creating short-term, minor, adverse impacts. These impacts will last only during construction. After construction, the MBT will have a beneficial impact on visitor use and experience by providing visitors to Rock Creek Park with new recreation options and supporting the Fort Circle Parks Management Plan's goal of connecting fort resources for visitor enjoyment.

***Degree of effect on public health or safety:*** Implementation of the selected alternative will not adversely affect public health and safety. During the construction phase, the NPS will work with DDOT to create safe street crossings and provide signs, sidewalks, and other amenities where necessary to ensure the safety of all park visitors.

***Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, wetlands, prime farmlands, wild and scenic rivers, or ecologically critical areas:*** No wetlands, prime farmlands, wild and scenic rivers, ecologically critical areas, sites sacred to American Indians, or other significant ethnographic resources occur within or adjacent to the proposed project area, and none

will be impacted by the actions associated with the selected alternative. Furthermore, the selected alternative will not jeopardize historic or cultural resources in or around the project area. The MBT will be located approximately 1000 feet away from the historic Fort Totten earthworks and several hundred feet away from Mamie D. Lee Community Garden.

***Degree to which effects on the quality of the human environment are likely to be highly controversial:*** There were no highly controversial effects identified during the preparation of the EA or the public review period.

***Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:*** There were no highly uncertain or unique or unknown risks identified during preparation of the EA or the public review period. This project is similar to other trail projects undertaken in Rock Creek Park.

***Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:*** The selected alternative neither establishes a NPS precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

***Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:*** Implementation of the selected alternative will have no significant cumulative impacts. As described in the EA, past, present, and future actions and projects within the vicinity of the project area adversely affecting soils, vegetation, wildlife, cultural resources, viewsheds, land use and visitor use and experience include the following: (1) A proposed mixed-use development by the Cafritz Group in the vicinity of the Fort Totten Metrorail station; (2) A proposed residential development by Eakin Youngentob Associates (EYA) at the Takoma Metrorail Station; (3) The continuation of the MBT into Prince George's County; and (4) Improvements to the Fort Totten Metrorail Station. Although these actions (if undertaken) will occur in an urban environment characterized by extensive development (past and present), each will result in the removal of vegetation and wildlife habitat, at least temporarily. Furthermore, the developments will likely displace soils, add infrastructure that changes viewsheds and impinges on cultural resources such as Fort Totten, change land uses, and alter the experience of visitors to properties in and around the project area. Although adverse cumulative impacts will be short-term to long-term, and negligible to minor, the contribution of the selected alternative will be negligible.<sup>5</sup>

***Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources:*** Cultural and historical resources exist within the vicinity of the selected alternative. The MBT will pass Fort Totten (about 1,000 feet from the earthworks and outside the cultural management zone), near the Mamie D. Lee Community Garden, and across the street from the Cady-Lee Mansion, although adverse effects on these resources will be minor or less. The trail will pass through areas previously disturbed to accommodate urban development; therefore, the potential for adversely impacting archeological resources is low. The DC Historic Preservation Officer (DC SHPO) was contacted for consultation and to fulfill the requirements of Section 106 of the National Historic Preservation Act. In a letter dated December 17, 2010, the DC SHPO determined that the Metropolitan Branch Trail will have no adverse effect on historic properties.

***Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:*** In accordance with Section 7 of the Endangered Species Act of 1973, DDOT sent a letter to the

<sup>5</sup> The Final EA contains a discrepancy regarding the impact of Alternative A1 on a "natural zone" near Fort Totten. On page 101, in a section addressing environmental consequences to land use, the Final EA states, "[d]ue to previous land disturbance and current transit oriented land uses surrounding the Fort Totten Metrorail station, impacts resulting from the proposed paved trail within the Natural Zone are considered long-term but minor." However, in a summary chart on page 32, the EA mistakenly states that this impact would be moderate.

U.S. Fish and Wildlife Service (USFWS) regarding potential occurrences of endangered species within the project area. The USFWS responded on November 30, 2010, stating that there were no documented occurrences of any federally listed species within the project area. No impacts to any state-listed or federally listed species are anticipated.

***Whether the action threatens a violation of federal, state, or local environmental protection law:*** The selected alternative violates no federal, state, or local environmental protection law.

## **PUBLIC INVOLVEMENT**

Three public meetings were held to present trail alternatives to the public and to obtain community feedback. Meetings were held in June 2004 for planned trail sections in the vicinities of Brookland, the Rhode Island Avenue Metrorail station, and Fort Totten. The meeting held for Fort Totten included public scoping for the EA process. In 2010, DDOT updated the public about the project by email and by trail and neighborhood listserv notification. Going forward, information will be disseminated through the project website (<http://www.metbranchtrail.com>).

The Draft EA for the MBT was available for public review and comment for 30 days, starting on November 15, 2010. The NPS posted a link to an electronic copy of the EA to the NPS Planning, Environment and Public Comment (PEPC) website. Additionally, paper copies were available at DDOT, Rock Creek Park Headquarters, and the District of Columbia's Martin Luther King Jr. Memorial Library.

DDOT received six public comments regarding the draft EA. In general, comments reflected support for the MBT, although some citizens expressed a concern that project infrastructure was **not** extensive enough (see Appendix A). For example, one commenter expressed a desire to connect the MBT to the North Michigan Park neighborhood, while another asked for a bridge across Riggs Road, NE. No changes were made to the EA based on public comment.<sup>6</sup>

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<sup>6</sup> In its responses to public comments, DDOT stated that its preferred alternative was a combination of Alternatives A1, B2 and C2. To clarify, the NPS selected alternative is a combination of Alternatives A1, B2 and C1.





**CONCLUSION**

The NPS has selected Alternatives A1, B2 and C1 for implementation. Taking into consideration the impacts described in the Final EA and related documentation, the NHPA Section 106 process, consultation with FHWA and DDOT, NPS and DOI laws, regulations and guidance, professional judgment of an interdisciplinary team, and agency and public comments, we conclude that no significant impacts will be caused by the selected alternative and adverse impacts will be negligible to minor in intensity. Further, impacts will not impair any park resources or values, and the selected alternative will not violate any federal, state, or local environmental protection law.

This is a finding of no significant impact. An EIS is not required for this action.

**Recommended:**   
\_\_\_\_\_  
Tara Morrison  
Superintendent  
Rock Creek Park

July 3, 2012  
Date

**Approved:**   
\_\_\_\_\_  
 Stephen Whitesell  
Regional Director  
National Capital Region

July 31, 2012  
Date

## **IMPAIRMENT OF PARK RESOURCES OR VALUES**

In addition to reviewing the list of criteria for significant impacts, the NPS has determined that implementing the selected alternative will not constitute an impairment of park resources or values. This conclusion is based on a thorough analysis of the impacts described in the EA, agency and public comments received, and the professional judgment of the decision-makers in accordance with NPS *Management Policies 2006*. As described in the EA, implementation of the selected alternative will not result in impairment of Rock Creek Park resources or values whose conservation is (1) necessary to fulfill specific purposes identified in the park's establishing legislation, (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or (3) identified in the park's management plan or other relevant NPS planning documents as being of significance.

The selected alternative will adversely impact some of the park's resources, including soils, vegetation, wildlife and cultural resources. Although these resources are necessary to fulfill the purposes for which the park was established, key to opportunities for enjoyment within the park, and/or identified as significant resources in the park's planning documents, the selected alternative does not constitute an impairment because it does not cause a major, adverse impact to these resources. Indeed, all adverse impacts of the selected alternative on these resources are negligible or minor. Furthermore, these impacts were contemplated in the Fort Circle Parks Management Plan/Environmental Assessment (2003), which proposed the "Fort Circle Parks Trail System." The MBT will contribute to this system.


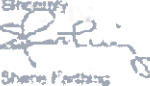
**Appendix A – Public Comments**

No.	Date	Comment	Response
001	11/16/2010	<p>Dear Ms. Deutsch,</p> <p>My name is Michael Lamm, I am a resident of the North Michigan Park neighborhood and I would like to suggest an alternative route for the bike trail from Fort Totten to the PGC park system. Many residents of the North Michigan Park neighborhood have been requesting a safe path through the woods between Galloway and Gallatin Streets that run from Fort Totten to South Dakota Avenue. The need for this path has also been identified in the Fort Totten Access Study which was conducted by WMATA (<a href="http://www.wmata.com/pdfs/planning/FortTottenFinal1022410_Revised.pdf">http://www.wmata.com/pdfs/planning/FortTottenFinal1022410_Revised.pdf</a> Section 3, page 22). So far NPS has been reluctant to put a safe path between Galloway and Gallatin Streets even though residents use these paths every day and they are simply not safe in their current state! But since DDOT/NPS is working together on adding a bike path from Fort Totten alongside Galloway and Gallatin Streets, it would be great if they would take the opportunity to make this neighborhood a safer place and add a bike/pedestrian path through the wooded area instead of running it along the park and missing the opportunity to connect the North Michigan Park neighborhood to Galloway Street.</p> <p>Thank you so much for your time.</p> <p>Kind Regards,</p> <p>Michael Lamm</p>	<p>Thank you for your comment, which will be included in the project Administrative Record. As a result of public input during the project scoping, DDOT considered a connection from the North Michigan Park neighborhood through the woods between Galloway and Gallatin Streets acting as a neighborhood connection to the metro and Prince George's County Spur. However, the connection was not supported by the National Park Service, landowner and cooperating agency, and was removed from Alternatives B1 and B2 in the draft Environmental Assessment.</p>

No.	Date	Comment	Response
002	11/1/6/20 10	<p>Dear Ms Deutsch,</p> <p>I enthusiastically support the extension of the Metropolitan Branch Trail from Fort Totten to the Takoma Station in the District of Columbia.</p> <p>The most important environmental reason to support the trail is that it provides a viable and practical alternative to driving, which consumes petroleum products and produces greenhouse gases and other pollutants. This alternative also alleviates traffic congestion and congestion on the Red line of Metro.</p> <p>Aside from the transportation benefit, trails provide a safe way for healthful exercise in the community - a significant environmental benefit.</p> <p>I have personally used the sections of the Trail that are complete and have taken the difficult and not nearly as safe temporary route that this extension would replace. As a 65-year old man and having seen children and people of all ages and races on the trail, I can attest to its universal attractiveness and usefulness.</p> <p>Sincerely yours,</p> <p>Richard Reis</p>	<p>Thank you for your comment, which will be included in the project Administrative Record. The Impact Topic "Visitor Use and Experience" notes that "Cumulative long-term and moderate to major beneficial impacts would occur in linking other planned trail networks and the remainder of the MBT".</p>
003	11/1/9/20 10	<p>A1 B2 C2 are the alternatives that I would choose for each of the areas. Given your suggestions as the most environmentally sound, I would choose those. That is very important, but also making sure the trail is safe for cyclists to use, otherwise the trail will not be used.</p> <p>I attended the ThinkBike Workshop and learned you were there, but never introduced myself. I really hope this happens and I entrust that you, along with other decision makers will be stewards of the environment as well as create a pleasant experience for cyclists to utilize the trails.</p> <p>Best, Paulo</p>	<p>Thank you for your comment, which will be included in the project Administrative Record. After consideration of the purpose of and need for the proposed action, analysis in the EA, and public and agency comments, DDOT has identified A1, B2, and C2 as the Preferred Alternatives.</p>

No.	Date	Comment	Response
004	11/30/2010	<p>Paul Meijer Notes to Heather</p> <p>I read most of the AE and after waiting all these years I am happy with most of the outline, except for one glaring exception: the crossing of Riggs road! This is murder.</p> <p>Riggs Rd. is according to DC traffic statistics, the second busiest road. A push button light would give a major traffic disturbance, all the way back to Georgia Ave.</p> <p>We have been battling the NPS to obtain a small piece of land south of Riggs Road for the abutment of the bridge. They gave us varying excuses, none of the very convincing.</p> <p>I am planning now to go to the newspapers to fight this.</p> <p>For the rest it is rather obvious:</p> <p>P. 21: A1 Except for the above mentioned crossing, lousy but acceptable.</p> <p>P. 27 B1 (B2 is acceptable.)</p> <p>P. 27 C3</p> <p>P. 28 the map is very unclear.</p> <p>In general: wildlife seems to be more important than human life, although I am happy to read that the NPS is in favor of enjoyment of the parks</p>	<p>Thank you for your comment, which will be included in the project Administrative Record. After consideration of the purpose of and needs for the proposed action, analysis of the EA, and public agency comments, DDOT has identified A1, B2, and C2 as the Preferred Alternatives. A bridge at Riggs Road was not supported by the National Park Service and was eliminated from detailed study in Environmental Assessment.</p>

No.	Date	Comment	Response
005	12/4/2010	<p>Ms. Deutsch.</p> <p>I would use the completed MBT often for commuting and recreation. With the completed MBT, I might be able to bike to work faster than I can drive there, with my home in Silver Spring and my workplace at Joint Base Anacostia-Bolling. When biking to work I have usually used the Sligo Creek Trail, which goes too far to the east so it is a much longer route to work than the MBT.</p> <p>For recreation, I prefer inline skating to biking, although it is a little slower. The current MBT temporary detours between Takoma and Catholic University are not safe for skating because of steep hills going into intersections. I often meet my skating friends near the White House before we do 10-20 mile long routes around the city. I usually drive to the White House for this but with the MBT complete I would go there on skates more often. I have skated and biked to the White House from home a few times and it takes about an hour when using Piney Branch Road, Kansas Ave. and 14th Street. But that is a somewhat dangerous route, especially in rush hour traffic.</p> <p>From looking at the alternatives on the maps, it seems like <i>alternative C3 going past the Takoma Metro Train Station is best</i>. It is close to the tracks so it would avoid hills better than the other alternatives. <i>In general, I like all the MBT route alternatives which minimize hills, especially hills that drop into busy intersections.</i> That makes them much better for inline skating, and also improves their utility for wheelchair athletes and bikers, especially the less fit bikers who would prefer trail biking to road biking.</p> <p>The Washington Area Roadskaters (<a href="http://www.skatedc.org">www.skatedc.org</a>) have used the MBT from Union Station to Catholic University a few times and we have been very happy with it. We look forward to going further on it during future recreational group skates.</p> <p>My 23 year old son has autism and he has done a lot of biking. His favorite route is Sligo Trail to Queens Chapel Road to Michigan Ave to Catholic University. He is too disabled to drive a car, so biking and public transportation are extra important to him. He would also like the completed MBT, which would be a much nicer way to get to Catholic University and other places he likes to visit in Washington.</p> <p>Thanks for accepting this under the Nov 15 - Dec 15 period for public comments.</p> <p>Bill English</p>	<p>Thank you for your comment, which will be included in the project Administrative Record. After consideration of the purpose of and need for the proposed action, analysis in the EA, and public and agency comments, DDOT has identified A1, B2, and C2 as the Preferred Alternatives. An alternative using Fort Totten Drive was not carried forward because it involved a gradient in excess of 11 percent greatly exceeding ADA standards as well as making it difficult to use for both cyclists and inline skaters.</p>

No.	Date	Comment	Response
006	12/15/2010	 <p>2000 Dakota Ave. NW Washington, DC 20002 703-824-9224 7-935-824-9224 WWW.WABA.ORG</p> <p>December 15, 2010</p> <p>Heather Deussen, Trail Planner, Planning, Policy and Sustainability Administration, District Department of Transportation, 2000 14th Street, NW, 2nd Floor, Washington DC 20004</p> <p>VIA EMAIL: heather.deussen@ddot.gov</p> <p>Dear Ms. Deussen,</p> <p>The Washington Area Bicyclist Association (WABA) is pleased to submit its comments on the draft Environmental Assessment for the Metropolitan Branch Trail on NPS Land. After over a decade of involvement in MBT related coordination and effort, we are pleased to have reached this point.</p> <p>We fully support the full funding and completion of this trail and its connections to existing bicyclist and pedestrian-serving infrastructure. We note our disappointment at the removal of the previously planned bridge allowing cyclists to cross Riggs Rd. and hope that DDOT will share with the cycling community the rationale for its removal. Yet we continue to support the alignment that will allow cyclists to most safely and efficiently travel along the trail with minimal detours, switchbacks, and at grade crossings. And we continue to support the MBT's construction as a stand-alone path of 10'-12" width.</p> <p>Therefore, we support the A2-B1-C3 linkage. We believe that this provides the most efficient route that results in efficient, off-road transportation usage for cyclists. We particularly wish to emphasize the importance of the "B" connection to the Anacostia Trails in Prince George's County, MD as a crucial link in the regional cycling network. Especially as land use interests in the surrounding area, including urban projects by the Calitz Foundation, UDC at Backus School, and several other significant District projects, transportation access to this area will be especially critical, and linkage to the broader trail network will be important for functional transportation, as well as recreational purposes. While the B2 configuration is suitable as an interim condition, the ultimate connection between the MBT and the Anacostia Trails System—two off-road paths—should similarly be off-road to ensure network accessibility to cyclists not comfortable in vehicular traffic.</p> <p>We look forward to continuing to work with the District and other project partners in completing and connecting the Metropolitan Branch Trail.</p> <p>Sincerely,            Shere Fordang          Executive Director</p>	<p>Thank you for your comment, which will be included in the project Administrative Record. After consideration of the purpose of and need for the proposed action, analysis in the EA, and public and agency comments, DDOT has identified A1, B1, and C2 as the Preferred Alternatives. A bridge at Riggs Road was not supported by the National Park Service and was eliminated from detailed study in Environmental Assessment.</p>