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## Categorical Exclusion Form

**Project:** Rehabilitate Reservation 149

**PEPC Project Number:** 31628

**Project Description:**

The National Park Service (NPS) in partnership with the Dupont Circle Citizens' Association (DCCA) and the Historic Dupont Circle Main Streets (HDCMS) is proposing to rehabilitate Reservation 149, a triangle park located between 20th Street NW, Q Street NW and Connecticut Avenue NW (Project). Reservation 149 is within the administrative jurisdiction of National Mall and Memorial Parks (NAMA). The park has not had significant rehabilitation since the 1960's. The site's masonry and hardened surfaces are currently in need of replacement with cracked concrete paving stones and curbs. The close proximity to two WMATA bus stops and the Dupont Circle Metro entrance results in heavy pedestrian traffic causing chronic turf damage and the development of social trails on the Q Street and Connecticut Avenue side of the park. NPS trash receptacles on the site are out of date and need replacement with current NPS standard equipment. The park is lacking trees that were included in the 1969 tree plan.

The proposal includes the following measures:

- 1) Remove/Reset flagstone replacing pieces as needed and adjust slope to allow for proper drainage. Remove and replace damaged historic quarter-round curb to match as close as possible.
- (2) Furnish and install wrought iron fence around southern perimeter of park as identified on the attached site plan.
- (3) Round the southeastern corner of the park to ease pedestrian access.
- (4) Remove existing "tulip" style trash receptacles. Furnish and install two new trash receptacles with NPS standard Victor Stanley style receptacles.
- (5) Remove and reset concrete flat work that borders the stone pavers and under the concrete benches.
- (6) Repair hardened soil areas around the benches and along the sidewalk by replacing with topsoil and sodding all disturbed areas.
- (7) Remove concrete around benches and replace with new concrete.

(8) Plant a new tree (consistent with 1969 tree plan) in southeastern corner of the park; replace one of the cherry trees and plant a new Chinese fringe tree where a tree used to exist in the northern portion of the park.

This work is being performed through a generous donation of services by the Historic Dupont Circle Main Streets to the National Parks Service (NPS) National Mall and Memorial Parks (NAMA) . The work is anticipated to occur during 2011-2012.

The contractor will coordinate with NPS resource protection staff to review submittals and match new materials including stone, trash receptacles and other materials to NPS specification to best match existing site materials. A more detailed workplan is attached to this project description.

#### SUMMARY OF PUBLIC COMMENT

On August 2, 2011, NAMA initiated a public comment period in order to solicit input from the community with regard to the proposal. During the 30-day comment period, NAMA received 32 letters, which collectively contained 24 general comments that may be grouped into 10 general categories. The table below summarizes these comments and provides NAMA staff's response. For the reasons described in the table, the NPS finds that the proposed project would not have significant environmental impacts, and with the described coordination with the District of Columbia and Washington Metropolitan Area Transit Authority (WMATA), would not be controversial and therefore warrants this Categorical Exclusion.

Public comments (grouped as appropriate)	NAMA Response
(1) The needs of current, modern pedestrian uses (including relating to the metro station and bus stop) should take priority over preservation of the historic design of the park; (2) NPS should pave new paths in order to meet the current needs of pedestrians; (3) NPS should pave the bus stop area; (4) NPS should redirect park walkways to the corners of 20 <sup>th</sup> Street & Q Street and Connecticut Avenue and Q Street; and (5) the proposal will not benefit the community or address current function of the park.	NPS' mission is to preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. NAMA may implement minor adjustments where necessary to protect resources (i.e., the rounded corner and the new fencing) or for safety, in consultation with the State Historic Preservation Office, but cannot change the overall character and design of a park based on pedestrian or traffic patterns that are temporal in nature and could change in the future. In addition, although the proposal would result in negligible to minor impacts to pedestrians, who would likely spend an extra several seconds navigating the sidewalk instead of walking directly through the park, there would be beneficial impacts to park visitors, as the character of the park would be enhanced.
(6) The sidewalk along Connecticut Avenue, particularly near the #42 bus stop, is too narrow for two-way pedestrian traffic,	The NPS does not manage the sidewalk surrounding Reservation 149. NPS proposes to significantly round the southeastern corner of

<p>especially given the existing obstructions (e.g., lamps and trash receptacles); and (7) the proposed fencing in this area is inappropriate due to safety-related and/or access restrictions at the sidewalk near the bus drop-off area.</p>	<p>the park in order to widen the sidewalk in this area and facilitate pedestrian flow to-and-from the metro station and bus stop. The proposed fencing is needed in order to protect the restored turf, trees, aesthetics, and visitor use at the park. However, NAMA acknowledges that, even with the rounding of the corner, the immediate vicinity of the WMATA bus drop-off would remain narrow and crowded due the presence of a District-owned street lamp and trash receptacle at the site of the bus stop. The proposed fence would require pedestrians to navigate through this narrow area (31 inches at the street lamp), rather than spilling into the park. In response to public comments, NPS and HDCMS met on September 21, 2011, with representatives from WMATA and the Ward 2 Councilman's office for the Dupont Circle neighborhood to discuss these conditions. WMATA has erected a replacement bus shelter a block south of Reservation 149 and plans on completing the relocation of the #42 bus stop by November. Additionally, the District of Columbia trash receptacle has been removed. The sidewalk will be clear of impediments except for the existing street lamp.</p>
<p>(8) The 42 bus should off-load across the street or at an alternate location.</p>	<p>This bus is under WMATA's jurisdiction. However, because the NPS proposal would exacerbate this pre-existing condition, NPS staff and Historic Dupont Circle Main Street are working with WMATA in an effort to move the bus stop to a less constricted location, as noted above.</p>
<p>(9) NPS should consider some low border fence protection for grassy areas, rather than a tall fence.</p>	<p>A short fence may not effectively protect resources and may pose a tripping hazard. A low border fence would not solve the problem of the constricted sidewalk width, as discussed above, in that it would still create a barrier.</p>
<p>(10) The NPS proposal is appropriate, as a fence is necessary to protect grass, and NPS should not encourage short cuts through the park; and (11) improvements at this park are needed and supported.</p>	<p>NAMA is pleased to be working with a partner to improve this historic park and benefit park visitors.</p>
<p>(12) NPS presents barriers to organizations</p>	<p>NAMA directs its resources and staff to</p>

that wish to improve parks.	address a list of priorities, which are determined across the entirety of the National Mall and Memorial Parks. In addition, all NPS proposals are subject to environmental and cultural compliance procedures, as well as review by federal commissions, park design reviews and construction permitting, which impact the length of the planning process. We appreciate the patience of park partners that are cooperating with us to move forward on improvement projects and the public's participation in the process.
<p>(13) NPS should install benches for bus users along Connecticut Avenue;</p> <p>(14) the sidewalk along Connecticut Avenue should be widened;</p> <p>(15) the new fence would be acceptable if the sidewalk is widened;</p> <p>(16) NPS should coordinate with District Department of Transportation to make changes to Connecticut Avenue; and</p> <p>(17) NPS should transfer jurisdiction of the reservation to the District.</p>	The sidewalk surrounding the park, as well as the street, are under the District's jurisdiction, and therefore outside the scope of this proposal. The NPS takes seriously its responsibility to manage many of the original open spaces in the city, as designed by the L'Enfant Plan, in the U.S. Reservations.
(18) NPS should allow vending at the park.	This is outside the scope of the current proposal, which is focused on park rehabilitation.
(19) Please ensure that construction will not interfere with use of this area as a market.	The park-issued special use permit for construction would address conflicting use/access issues; construction would not occur during the weekends.
<p>(20) NPS should consider not using black paint color for benches;</p> <p>(21) NPS should move two of the trash receptacles within the fenced area to the corners, against the fencing;</p> <p>(22) consider a willow oak in place of the Chinese fringe tree, as it may grow taller, is more colorful in the fall, and has narrow leaves;</p> <p>(23) consider reducing the number of benches from 9 to 7 and use new, sturdier models; and</p> <p>(24) consider installing irrigation at the park</p>	Repairs and replacements to park furnishings will be in-kind and consistent with other uptown reservations, as consistent detailing is the primary means of maintaining the NPS identity at reservations throughout DC. The black color is classic and unobtrusive. Once fencing is installed, trash receptacles will be placed to facilitate circulation. The fringe tree is a replacement for a tree on the historic planting plan and was requested by members of the community early in the process. Maintenance of the benches and trash receptacles is part of this project. There is a manual irrigation system in the park.

**Project Locations:**

**Location**

**County:** NA

**State:** DC

**District:**

**Section:**

**Geo. Marker:**

**Other:**

**Mitigation(s):**

- No mitigations identified.

**Describe the category used to exclude action from further NEPA analysis and indicate the number of the category (see Section 3-4 of DO-12):**

C.4 Routine maintenance and repairs to cultural resource sites, structures, utilities and grounds under an approved Historic Structures Preservation Guide or Cyclic Maintenance Guide; or if the action would not adversely affect the cultural resource.

**On the basis of the environmental impact information in the statutory compliance file, with which I am familiar, I am categorically excluding the described project from further NEPA analysis. No exceptional circumstances (e.g. all boxes in the ESF are marked "no") or conditions in Section 3-6 apply, and the action is fully described in Section 3-4 of DO-12.**

**Superintendent:** Stephen Locantelli **Date:** 10/12/11

**NPS Contact:** Kristen Murphy **Date:** 10/11/11