



Suitland Parkway
National Capital Parks – East, Washington, D.C.

FINDING OF NO SIGNIFICANT IMPACT

MD 4 at Suitland Parkway Interchange Construction

National Capital Parks East,
Prince George's County, Maryland

INTRODUCTION

The Maryland State Highway Administration (SHA) is proposing transportation improvements to the existing intersection of MD 4 and Suitland Parkway in Maryland. A portion of the Suitland Parkway is administered by the United States Government and under the jurisdiction of the National Park Service (NPS) National Capital Parks-East. As such, construction activities tied to the proposed improvements will require temporary occupancy of NPS lands through issuance of a Special Use Permit. Additionally, improvements at this intersection will require a transfer of NPS land to SHA via a land exchange at the eastern terminus of the Suitland Parkway. NPS will receive a 12.8 acre parcel of land adjacent to Fort Foote Park. The transferred lands will accommodate the expanded footprint of the interchange and the relocation of a fuel pipeline. The project area is located immediately northeast of Joint Base Andrews Naval Air Facility Washington (JBA) and approximately one mile south of the Capital Beltway (I-95/I-495).

The purpose of the action is to facilitate transportation improvements at the intersection of MD 4 and Suitland Parkway. This action will increase roadway capacity to meet existing and projected travel demands along the MD 4 corridor and address safety concerns. The action is needed because the corridor currently experiences excessive traffic congestion, which is projected to increase as future development brings more commuters to the area.

The NPS, FHWA, and SHA completed an Environmental Assessment (EA) that analyzed the environmental consequences of alternatives considered for the project. This EA was prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), its implementing regulations, and the NPS's Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making, which requires that impacts to park resources be analyzed in terms of their context, duration, and intensity (NPS 2001). Based on the analysis presented in the EA, the Selected Alternative, as described in the text that follows does not constitute an action that normally requires preparation of an EIS.

SELECTED ALTERNATIVE

Based on the analysis of an SHA Value Engineering Study completed in 2004, the Section 4(f) Evaluation, and the analysis presented in the EA, SHA has identified Alternative 3: Signalized Diamond Interchange with Directional Ramp as the Selected Alternative because it will best meet the project purpose and need and has comparable environmental impacts as the other alternatives evaluated. Through continued coordination with SHA and FHWA, the NPS agreed that Alternative 3 is the Selected Alternative. Following public availability of the EA, NPS identifies Alternative 3 as the Selected Alternative.

The Selected Alternative will include the construction of a grade-separated, signalized diamond interchange with a directional ramp at the intersection of MD 4 and Suitland Parkway/Presidential Parkway. MD 4 will be lowered and Suitland Parkway will be raised to an overpass. The centerline of MD 4 will be shifted approximately 75 feet east to reduce impacts to Suitland Parkway. The elimination of an at-grade intersection in favor of a grade-separated interchange will remove a major conflict point caused by the signal on MD 4, and will separate through traffic on MD 4 from Suitland Parkway. In addition, providing separated free-flow lanes for the main movements – from northbound MD 4 to westbound Suitland Parkway and from eastbound Suitland Parkway to southbound MD 4 – will substantially improve operations at the interchange. The left-turns at the ramp terminal signalized intersections on the overpass will have fewer opposing vehicles, compared to the existing signal on MD 4, because of the grade separation from MD 4.

The existing ramp from Old Marlboro Pike to westbound Suitland Parkway will be removed. Access between westbound Suitland Parkway and JBA North Gate will be maintained. The existing ramp from eastbound Suitland Parkway to JBA North Gate will be maintained. The access from JBA North Gate to eastbound Suitland Parkway and Old Marlboro Pike will be via a newly constructed spur diverging from the outbound ramp (from JBA North Gate to westbound Suitland Parkway). This spur will connect (in a T-intersection) to a newly constructed two-lane road between Old Marlboro Pike and the ramp from southbound MD 4 to Suitland Parkway. This two-lane road will terminate at the ramp from southbound MD 4 to Suitland Parkway as a right-in and right-out connection. This will allow travel to eastbound Suitland Parkway and further to southbound MD 4.

The Selected Alternative includes the construction of a bike/multi-use path connecting Presidential Parkway and developments north of the project with Old Marlboro Pike. The path will run parallel to the westbound lanes of Suitland Parkway across MD 4 then continue northwest via a spur road connection to Old Marlboro Pike.

Utility relocations are also required, including the relocation of an existing high pressure fuel line that runs parallel to the westbound lanes of Suitland Parkway and crosses under Suitland Parkway about 350 feet west of the intersection with MD 4. The relocation of the high pressure fuel line will include the removal of 3,250 linear feet of the existing fuel line from a tie-in location adjacent to the westbound lanes of Suitland Parkway to the existing JBA perimeter fence crossing, which is located adjacent to southbound MD 4. A 355 linear foot segment of fuel line will be abandoned in place as it travels along the rock walls paralleling the westbound lanes of Suitland Parkway and under the existing Suitland Parkway Bridge over the entrance ramp to the JBA North Gate. New fuel line (2,100 linear feet) will be laid between the tie-in location and a new crossing under the JBA perimeter fence, resulting in a reduction of 1,150 linear feet of fuel line within this area. The new fuel line will extend south under existing

Suitland Parkway, approximately 2,450 linear feet west of the existing intersection with MD 4. The fuel line will continue parallel to the eastbound lanes of Suitland Parkway until turning south to the new JBA perimeter fence crossing, located approximately 1,200 linear feet west of the existing intersection with MD 4.

Construction of the Selected Alternative will require an NPS construction permit to accommodate the interchange construction and requisite utility relocations. Additionally, a permanent transfer of 6.9 acres of land from NPS to SHA will occur via a land exchange between the agencies. Areas identified for transfer include:

- The land that will be occupied by the directional ramp from MD 4 northbound to Suitland Parkway westbound as it traverses Suitland Parkway property, north of the Suitland Parkway mainline;
- Suitland Parkway approaches to the proposed interchange from immediately east of the bridge over the entrance ramp to JBA to the existing SHA ROW; and
- The land that will be occupied by the directional ramp connecting eastbound Suitland Parkway with southbound MD 4.

In exchange for these lands SHA will transfer fee simple ROW of 12.8 acres located at 8801 Fort Foote Road to NPS – National Capital Parks East. This property is located adjacent to the NRHP boundary of Fort Foote and will provide substantial benefits to the regional park entity. This property was identified by NPS, National Capital Parks East and offers a natural area buffer between the Fort Foote Park and surrounding residential development.

OTHER ALTERNATIVES CONSIDERED

In addition to the NPS Selected Alternative described above, the EA analyzed a No Action Alternative and Alternative 2: Diamond Roundabout Interchange.

Under the No Action Alternative, the existing at-grade intersection would remain. The intersection of MD 4 and Suitland Parkway would continue to operate at a LOS F and congestion would remain an issue at the intersection.

Alternative 2 would construct a diamond roundabout interchange, requiring approximately nine acres of permanent land transfer. The interchange would consist of two roundabouts constructed on either side of the MD 4 overpass of Suitland Parkway, at the terminus of the MD 4 on- off-ramps. All traffic traversing the intersection would circumnavigate the two roundabouts located at the ramp terminals of the interchange. This alternative would include the same requisite utility relocations, including the fuel line relocation described under the Selected Alternative. This alternative would require a land transfer of 10.9 acres from NPS to SHA to facilitate the improvement and expansion of the intersection MD 4 and Suitland Parkway. The SHA Value Engineering Study completed in 2004 found that the roundabout interchange design of Alternative 2 would have failing traffic operations upon opening, resulting in lengthy queues along the ramp from northbound MD 4. Moreover, the east-west movement along Suitland Parkway through the interchange would be affected as the volume of traffic entering from the peak flow legs would consume the available capacity of the roundabout and prevent other traffic from

entering the roundabout. The interchange would also operate with less efficient weave conditions for traffic leaving JBA toward southbound MD 4, creating additional potential conflict points and reducing the effective management of congestion for this movement. The roundabout design would be difficult for pedestrians and bicycles to navigate safely. Therefore, it was determined that this alternative would not adequately meet the operational and capacity requirements to meet the project purpose and need.

FHWA and SHA prepared a Section 4(f) Evaluation that further evaluated numerous alternatives, including the No Action Alternative (Alternative 1), a diamond roundabout interchange (Alternative 2), and a signalized diamond interchange with directional ramp (the Selected Alternative), and other alternatives that would avoid or minimize impacts to Suitland Parkway. Based on the alternatives analysis presented in the Section 4(f) Evaluation, there is no feasible and prudent avoidance alternative to the proposed use, the Selected Alternative is the alternative that causes the least overall harm to Section 4(f) properties, and the Selected Alternative includes all possible planning to minimize harm to Section 4(f) resources (Suitland Parkway).

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The NPS is required to identify the “environmentally preferable alternative” for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and CEQ's NEPA's Forty Most Asked Questions, defines the environmentally preferable alternative (or alternatives) as the alternative that best promotes the national environmental policy expressed in NEPA (Section 101(b) (516 DM 4.10). In their *Forty Most Asked Questions*, CEQ further clarifies the identification of the environmentally preferable alternative, stating “Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources” (Q6a).

As evaluated, pursuant to the CEQ regulations, Alternative 1: the No Action Alternative is the Environmentally Preferable Alternative, as it would have minimal environmental impacts. Alternative 1 would result in impacts to transportation as traffic volumes increase. Lengthy queues and delays would continue along Suitland Parkway and MD 4. However, there would be no impacts to soils, vegetation, wetlands, wildlife, and cultural resources from Alternative 1. Implementation of either of the action alternatives would improve traffic conditions in the project area; however, the impacts to soils, vegetation, wetlands, wildlife, and cultural resources within the project area would far exceed those impacts that would occur under Alternative 1: the No Action Alternative.

MITIGATION MEASURES

The NPS places a strong emphasis on avoiding, minimizing, and mitigating potential adverse environmental impacts. The SHA will ensure all appropriate regulations are implemented to assure compliance during the construction of the Selected Alternative. The NPS will implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures will be properly implemented to achieve their intended results. Mitigation measures are outlined in **Table 1**, below.

Table 1: Mitigation Measures

Impacted Resource	Mitigation Measures
Soils	<ul style="list-style-type: none"> A Sediment Erosion/Sediment Control (SE/SC) plan, prepared in accordance with MDE 2011 <i>Maryland Standards and Specifications for Soil Erosion and</i>

	<p><i>Sediment Control</i>, will include temporary best management practices (BMPs) such as installation of silt fence and sediment trapping or filtering. The SE/SC plan will be utilized during construction to minimize erosion and sedimentation from ground disturbing activities that expose bare soil as well as temporary impacts to water quality.</p> <ul style="list-style-type: none"> • The establishment of permanent vegetative cover in accordance with an approved landscaping plan, approved by the NPS, which will ensure the long-term stability of soils within the project area.
Water Quality	<ul style="list-style-type: none"> • Stormwater management will be prepared and implemented in accordance with the <i>2000 Maryland Stormwater Design Manual</i>, Volumes I & II (MDE 2000, revised 2009), addressing long-term stormwater runoff. • EPA approved BMPs as required under the Chesapeake Bay TMDL, Chesapeake Bay Agreement 2014, and EISA section 438
Wetlands and Surface Waters	<ul style="list-style-type: none"> • Areas designated for access of equipment and for the removal or disposal of material will avoid impacts to streams to the extent feasible.
Vegetation/Wildlife	<ul style="list-style-type: none"> • Areas designated for access of equipment and for the removal or disposal of material will avoid impacts to riparian vegetation. • Tree cutting will be minimized. This includes protection measures and BMPs as well as reducing the limit of disturbance compared to the preliminary designs. A maximum total of 58 trees will be removed to accommodate construction of the access road. • The limits of vegetation clearing will be clearly depicted on all construction documents. Additionally, “hard” protection and marking in the field will be used to ensure that the disturbance and alteration of vegetation and wildlife habitat is kept to a minimum. • A landscape plan has been developed by SHA, in consultation with NPS and MHT. Under this plan, afforestation and reforestation will occur on NPS lands. The landscape plan will be implemented following construction and will include the management of invasive species. The landscaping plan will incorporate grading and planting trees, shrubbery, and other plants that are visually and historically compatible with the existing historic and cultural landscape of the Suitland Parkway. Re-vegetation in accordance with the landscaping plan will incorporate native vegetation that, upon maturity, will provide food and shelter for wildlife species displaced by habitat removal during construction.
Cultural Resources	<ul style="list-style-type: none"> • A Memorandum of Agreement (MOA) was executed by NPS, FHWA, Maryland Historical Trust (MHT), and SHA October 17, 2014 (Attachment A). MHT acts as the Maryland State Historic Preservation Officer (SHPO). The MOA outlines measures to mitigate for adverse effects to Suitland Parkway, which include but are not limited to: salvaging and reusing the historic stone cladding from the North Gate Bridge; matching the color and texture of the mortar used on the south side of the bridge to the original; using a mason with at least five years of experience repointing historic masonry bridges; using a stone and mortar bonding pattern on the exterior of the parapets and abutments of the directional ramps that is similar to the pattern on the Suitland Parkway Bridge. • Through consultation with NPS and MHT, SHA has developed signage,

	<p>lighting, and surface treatments for the action alternatives that will be compatible with the cultural landscape.</p> <ul style="list-style-type: none"> • If during construction, archeological resources are discovered, all work in the immediate vicinity of the discovery would be halted until the resources can be identified and documented and an appropriate mitigation strategy developed. Consultation with NPS, and/or the NPS Regional Archeologist, and if necessary, with the SHPO, would be coordinated to ensure that the protection of resources is addressed. 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 of 1990 (25 USC 3001) would be followed. • As mitigation for the land transfer, SHA will transfer 12.8 acres of land adjacent to Fort Foote. Fort Foote is situated on the northern bank of the Potomac River, located in southeast Prince George's County, in Fort Washington, Maryland. Like Suitland Parkway, Fort Foote is managed by NPS National Capital Parks-East. The 12.8 acres proposed for transfer to NPS will provide a natural buffer between Fort Foote and the surrounding residential area.
Visitor Use and Experience	<ul style="list-style-type: none"> • Per the MOA, appropriate design and landscaping techniques will be utilized to maintain the parkway experience for visitors.
Transportation	<ul style="list-style-type: none"> • All work will be performed in accordance to the SHA work zone traffic control management strategies (SHA 2006). Construction of the interchange will cause changes in traffic patterns as well as road closures. A plan is being developed to maintain traffic and minimize impacts to commuters. Suitland Parkway users will be notified of changes in traffic patterns as well as road closures by public notification which will include; detour signage, NPS, and SHA websites, social media, email, and listserv notices.

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

As documented in the EA, NPS has determined that the Selected Alternative 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): Topography and soils, wetlands, vegetation, wildlife, historic structures and districts, cultural landscapes, visitor use and experience, and transportation will experience adverse impacts as a result of implementing the Selected Alternative; however, no significant impacts were identified that will require analysis in an EIS. Specific impacts identified for each impact topic are listed below:

Topography and Soils: There will be short- and long-term minor adverse impacts on topography and soils from grading and excavation during construction. Soils impacted by the proposed grading will primarily be Udorthents, or those whose original soil composition was previously altered for the construction of

Suitland Parkway and MD 4, or other development. An SE/SC plan, BMPs, and an approved landscaping plan will be utilized to ensure the long-stability of soils in the project area.

Wetlands and Surface Waters: There will be short- and long-term minor adverse impacts to wetlands as result of grading and excavation during construction. The use of BMPs and treatment of stormwater quality and quantity will minimize impacts to wetlands. Construction activities will result in the temporary disturbance of less than 0.1 acre of wetland and the addition of 2.9 acres of impervious surface within the boundary of Suitland Parkway. This project is exempted from the statement of findings requirement of NPA DO 77-1: *Wetland Protection* because it includes a small area of impact and thus is an “exempted action” under DO 77-1. .

Vegetation: There will be short- and long- term moderate adverse impacts to vegetation from grading and excavation required for construction activities. The Selected Alternative will result in the clearing of approximately 20.7 acres of vegetation, including grasses, shrubs, and approximately 4.7 acres of forested area. Afforestation and reforestation of 5.5 acres on NPS land and invasive species management is also included.

Wildlife: Temporary disturbances as a result of construction will have short- and long-term minor adverse impacts to wildlife habitat. Temporary construction-related disturbances could cause species to relocate to similar suitable habitat in the area. The Selected Alternative will result in the disturbance of 4.7 acres of forested habitat and less than 0.1 acre of wetland habitat. Given the relatively small area of disturbance, species will likely reestablish themselves following construction in adjacent areas of sufficient habitat. Additionally, revegetation in accordance with an approved landscape plan will, upon maturity, provide sufficient food and shelter for the reestablishment of some species.

Historic Structures and Districts: The Selected Alternative will have a long-term moderate adverse impact to the Suitland Parkway Historic District as a result of the required land acquisition as well as the reconstruction of the North Gate and Suitland Parkway Bridges. These impacts will be mitigated through the stipulations in the MOA executed by NPS, FHWA, MHT, and SHA October 17, 2014. This alternative will not result in the Suitland Parkway being removed from listing on the National Register of Historic Places (NRHP).

Cultural Landscapes: Reconstruction of the eastern terminus of the Suitland Parkway will result in long-term moderate adverse impacts to the cultural landscape of Suitland Parkway. An NPS- and MHT- approved landscaping plan and the design features outlined in the MOA will minimize the effects and the perception of impact to the lay visitor on the cultural landscape. The implementation of the Selected Alternative will have short-term minor adverse impacts and a long-term benefit to transportation. Construction activities will result in detours and delays in the short-term. A plan to maintain traffic and minimize impacts to drivers during construction will be developed to mitigate for the short-term impacts. Following construction, the Selected Alternative will have a beneficial effect on transportation from the improved function and operation of the MD 4 and Suitland Parkway intersection.

Visitor Use and Experience: The implementation of the Selected Alternative will result in short-term minor adverse impacts to visitor use and experience due to construction activities that will last approximately four years. Following construction, the Selected Alternative will result in a long-term

benefit to visitor use and experience from the ability to accommodate future traffic volumes, thereby improving travel efficiency and preserving the Parkway utility for drivers.

Transportation: The Selected Alternative will result in short-term minor adverse impacts to transportation due to construction activities that will last approximately four years. Following construction the Selected Alternative will result in a long-term benefit to transportation due to improved function and operation within the interchange.

Degree of effect on public health or safety: The Selected Alternative will not result in a potential safety or health hazard to the public. Transportation improvements will result in increased safety for travelers on Suitland Parkway and MD 4.

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: The project area does not contain any prime farmlands, wild and scenic rivers, ecologically critical areas, or park lands other than the Suitland Parkway that is the subject of this EA.

Construction activities for the Selected Alternative will result in the temporary disturbance of less than 0.1 acre of wetland. This project is exempted from the statement of findings requirement of NPA DO 77-1: *Wetland Protection* because it includes a small area of impact and thus is an “exempted action” under DO 77-1.

The Selected Alternative will be constructed within and adjacent to the boundaries of the Suitland Parkway which is listed on the National Register of Historic Places. Construction will include raising the profile of Suitland Parkway as it approaches MD 4, the installation of additional roadway pavement to provide ramp access to southbound MD 4 from eastbound Suitland Parkway, and the construction of a directional ramp providing access to westbound Suitland Parkway from northbound MD 4. Additionally, the profile of Suitland Parkway will be widened to four lanes as it approaches the MD 4 overpass. This widening will require the reconstruction of the south side of the Suitland Parkway Bridge over the entrance to the JBA North Gate, a contributing resource to the Suitland Parkway Historic District. Reconstruction of this bridge will be completed in accordance with the aforementioned MOA. Further, the Selected Alternative will require the relocation of 3,250 linear feet of high pressure fuel line from a tie-in location adjacent to the westbound lanes of Suitland Parkway to the existing JBA perimeter fence crossing. Construction will require a land transfer of 6.9 acres from NPS to SHA.

Per consultation with MHT, dated March 31, 2010, the Selected Alternative will result in an *adverse effect*. However, the Selected Alternative will not result in Suitland Parkway being removed from listing on the NRHP and the adverse effects will be addressed by the stipulations outlined in the aforementioned MOA, which was executed on October 17, 2014 (**Attachment A**).

Degree to which effects on quality of the human environment are likely to be highly controversial: No highly controversial effects in terms of scientific uncertainties will result from the Selected Alternative, based on input received from the public and regulatory agencies on the EA.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks: No highly uncertain, unique, or unknown risks were identified during either preparation of the EA or by the public during the public comment period.

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: As described in the EA, past, present, and future actions and projects within the project area could affect soils and topography, surface waters, vegetation, wildlife, historic structures and districts, the cultural landscape, visitor use and experience, and transportation. Effects could result from the implementation of the Selected Alternative; past county, state, and Federal developments; implementation of the Westphalia Sector Plan and Sectional Map Amendment (2007), the JBA 25-Year Strategic Plan; other MD 4 corridor improvements; Westphalia Town Center; implementation of the JBA 25-Year Strategic Plan; previous surface widening of the Suitland Parkway Bridge and JBA North Gate Entrance; SHA and Prince George's County Transportation Projects; MDOT Consolidated Transportation Program for FY 2012 to 2017; and Prince George's County FY 2014-2019 Proposed Capital Improvement Program.

The EA addressed cumulative impacts for each of the resources affected by the Selected Alternative – soils and topography, wetlands and surface waters, vegetation, wildlife, historic structures and districts, cultural landscapes, visitor use and experience, and transportation – and the above referenced past, present and future actions.

Topography and Soils: The Selected Alternative will contribute to long-term minor adverse cumulative impacts on topography and soils. SE/SC plans and the implementation of appropriate BMPs will mitigate and minimize soils erosion in the project vicinity.

Wetlands and Surface Waters: The Selected Alternative will contribute to long-term minor adverse cumulative impacts on wetlands and surface waters. SE/SC plans, the implementation of appropriate BMPs, and adherence to MDE SWM regulations will mitigate and minimize the minor adverse impacts in the watershed.

Vegetation: The Selected Alternative will contribute to long-term minor adverse cumulative impacts on vegetation. BMPs, vegetation protection measures, tree save plans, and adherence to approved MHT and NPS landscape plans will mitigate and minimize the minor adverse impacts in the project vicinity.

Wildlife: The Selected Alternative will contribute to long-term minor adverse cumulative impacts on wildlife. Re-vegetation in accordance with approved landscape plans will mitigate and minimize the minor adverse impacts in the project vicinity.

Historic Structures and Districts: No present or future additional actions were identified in the project vicinity that will cause cumulative impacts to historic structures and districts.

Cultural Landscapes: No present or future additional actions were identified in the project vicinity that will cause cumulative impacts to cultural landscapes.

Visitor Use and Experience: Other than the Selected Alternative, there are no planned projects that will affect visitor use and experience of the Suitland Parkway since it is the only NPS-owned or publicly-owned property to which visitor use and experience is applicable. Therefore, the Selected Alternative will not contribute to cumulative effects on visitor use and experience.

Transportation: As stated in the EA, long-term minor cumulative impacts to transportation will be expected as a result of past, present, and reasonably foreseeable actions occurring in the project vicinity. MD 4 Corridor improvements, including those at the MD 4 intersections with Westphalia Road and Dower House Road, in conjunction with the Selected Alternative will alleviate traffic congestion on MD 4 and on Suitland Parkway. This will result in a cumulative long-term benefit to transportation.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources: Suitland Parkway spans 9.18 miles through a 418.9-acre corridor managed by NPS. The entire parkway is a historic district listed in the NRHP as part of a multiple property submission for the “Parkways of the National Capital Region, 1913-1965,” under both Criterion A for transportation, and Criterion C for landscape architecture related to the parkway system developed during the first half of the twentieth century (NPS 1995).

Compliance with the National Historic Preservation Act of 1966, including Section 106, is being completed as a separate process. In letters dated March 6, 1998 and March 31, 2010, SHA contacted MHT regarding the proposed MD 4/Suitland Parkway Interchange project. The SHA considered possible physical, visual, atmospheric, and audible impacts to historic properties in determining the Area of Potential Effects (APE) for the project. Based on research to identify potentially significant architectural resources, SHA determined (and MHT concurred) that the Suitland Parkway is the only historic property within the APE of the project.

The Selected Alternative will result in 6.9 acres of the eastern terminus of Suitland Parkway to be transferred from NPS to SHA. The area to be transferred is currently an at-grade, four-way, signalized intersection. The primary future use of the property will remain transportation with an improved grade separated interchange to increase operational efficiency.

Per the consultation with MHT (March 31, 2010), the Selected Alternative will result in an *adverse effect* to Suitland Parkway. However, the alternative will not result in Suitland Parkway being removed from listing on the NRHP. The adverse effects will be addressed through stipulations outlined in the MOA, executed by FHWA, NPS, SHA, and MHT October 17, 2014.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat: Pursuant to Section 7 of the Endangered Species Act of 1973, the SHA solicited comments from the U.S. Fish and Wildlife Service (USFWS), Maryland Department of Natural Resources (MDNR) Wildlife and Heritage Division, and MDNR Environmental Review Unit regarding the existence of threatened or endangered species in the project area in March 2012 (**Attachment B**). In April 2012, the USFWS responded confirming, except for occasional transient individuals, no federal proposed or listed endangered or threatened species are known to exist within the project area. The MDNR responded in May 2012, stating, “There are no State or Federal records for rare, threatened, or endangered species identified within the boundaries of the project site”

In April 2012, the MDNR Environmental Review Unit requested the following commitments regarding fisheries resources within the project area:

- Existing riparian vegetation in the stream channel area will be preserved as much as possible to maintain aquatic habitat.
- Areas designated for equipment use and material disposal will avoid impacts to stream and associated riparian vegetation.
- Temporarily disturbed areas will be restored and re-vegetated.
- The use of concrete will be managed to assure curing processes do not impact the stream or modify stream PH.
- Potential fish species will should be adequately protected by the Use I instream work prohibition, time of year restriction through sediment and erosion control measures and other BMPs.

Prior to construction, during design review, MD SHA will consult the NPS to determine whether the Section 7 consultation is still valid or needs to be updated based on either new species listings or design changes. Additional consultation with USFWS and or MDNR will be done as required.

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 laws.

PUBLIC INVOLVEMENT

Per CEQ Regulations for Implementing NEPA Part 1501.7, “There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.”

The project team held an internal scoping meeting on December 12, 2013. During the meeting, the following topics were discussed: project schedule, project purpose and need, environmental issues and impact topics, and conceptual alternatives.

In addition to internal and agency scoping, public scoping for the EA began on February 26, 2014 and concluded March 26, 2014. Notice of the public scoping period was posted on the NPS Planning, Environment, and Public Comment website (PEPC) (<http://parkplanning.nps.gov/md4>). NPS also sent email notices of the meeting to individuals and organizations.

During the 30-day public comment period, comments were received from two individuals. One of the comments cited concerns for traffic within the project area, specifically citing the need for improvements to southbound MD 4 mainline between Dower House Road and Suitland Parkway in order to increase roadway capacity. The other commenter expressed interest in the project and requested to be included on the project mailing list.

The NPS released the MD 4 at Suitland Parkway Interchange Construction Environmental Assessment for public review and comment on June 11, 2014 via the PEPC website (<http://parkplanning.nps.gov/md4>). The public comment period concluded on July 23, 2014. During this period no public comments were received.

CONCLUSION

The NPS has selected Alternative 3: Signalized Diamond Interchange with Direction Ramp, for SHA's implementation. In light of the impacts described in the EA and with guidance from NPS *Management Policies 2006*, natural and cultural resources information, professional judgment, and consideration of agency and public comments, the impacts that will result from the Selected Alternative will not impair any NPS property resources and values. The Selected Alternative does not constitute an action that will require the preparation of an EIS. The Selected Alternative will not have a significant effect on the human environment. Long-term, adverse environmental impacts that will occur are negligible to moderate in intensity. There are no significant impacts on soils, water quality, wetlands, vegetation, wildlife and wildlife habitat, cultural resources, aesthetics, land use, human health and safety, and visitor/resident use and experience. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the Selected Alternative will not violate any federal, state, or local environmental protection law.

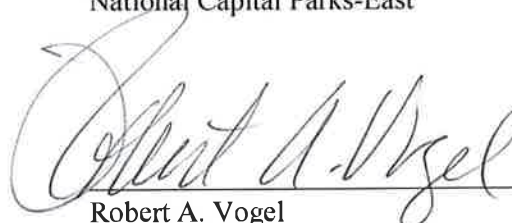
Based on the foregoing understanding, an EIS is not required for this action and thus will not be prepared. This is a finding of no significant impact.

Recommended:


Gopaul Noojibail
Superintendent
National Capital Parks-East

2/5/15
Date

Approved:


Robert A. Vogel
Regional Director
National Park Service, National Capital Region

2/25/15
Date

NON-IMPAIRMENT DETERMINATION

The determination on impairment has been prepared for the Selected Alternative. An impairment determination is made for all resource impact topics analyzed for the Selected Alternative. An impairment determination is not made for visitor use and experience, human health and safety, or neighborhoods because impairment findings relate back to Park resources and values, and these impact areas are not generally considered to be Park resources or values according to the Organic Act, and cannot be impaired in the same way that an action can impair Park resources and values.

The NPS currently uses their 1984 Park Road Standards to define the purpose and guidelines of their roadways. The Suitland Parkway is defined as a Class VII Urban Parkway meaning, “these facilities serve high volumes of park and non-park related traffic and are restricted, limited-access facilities in an urban area. This category of roads primarily encompasses the major parkways which serve as gateways to our nation’s capital. They serve as attractive, landscaped gateways and share many of the high-speed, high-volume traffic characteristics of expressways of the state and Federal highway network. Traffic safety must also be considered as well as the protection and enhancement of landscape, aesthetic, environmental, and cultural characteristics. These parkways are intended to blend high-volume traffic safety with the values of the NPS (NPS 1984).”

The NPS has determined that the implementation of the Selected Alternative will not constitute an impairment to the resources or values of Suitland Parkway. This conclusion is based on consideration of the thorough analysis of the environmental impacts described in the EA, relevant scientific studies, the comments provided by the public and others, and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies 2006*. Implementation of the NPS preferred alternative will not result in impairment of 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 result in short-term to long-term negligible to moderate adverse impacts on some of the Park’s resources, which include topography and soils, wetlands and surface waters, vegetation, wildlife, historic structures and districts, and cultural landscapes. As discussed in the text that follows, the Selected Alternative will not likely to harm the integrity of Suitland Parkway resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values.

TOPOGRAPHY AND SOILS

Temporary impacts to topography and soils will include the disturbance of 20.7 acres due to grading and excavation. There will also be 6.9 acres of permanent impact from grading and excavation. The permanent impact is a result of the modification of topography within the project area to accommodate ramps, new roadways, and the bike/multi-use path.

Construction activities, including the fuel line relocation, will require the preparation of an SE/SC plan that will be written pursuant to the *2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control*. BMPs will be utilized to minimize soil erosion and prevent soils from leaving the project area. In addition, re-vegetation, following an approved landscaping plan, will ensure the long-term stability of the soils within the project area.

Although there will be short- and long-term minor adverse impacts to soils and topography, the majority of impacted soils will be Udorthents soils, or those whose original soil composition was previously altered for the construction of the Suitland Parkway and MD 4. The implementation of a SE/SC plan,

utilization of BMPs, and re-vegetation to ensure the long-term stability of soils will ensure the long-term viability of Suitland Parkway to serve as a Class VII Urban Parkway as defined in the NPS *1984 Park Road Standards*. Therefore, the impacts of the Selected Alternative will not constitute impairment to topography and soils.

WETLANDS AND SURFACE WATERS

The construction of the Selected Alternative will result in temporary and permanent impacts to wetlands and surface waters less than 0.1 acre. Implementation of erosion and sediment control practices will include the installation of silt fence, sediment trapping or filtering, and other BMPs to minimize temporary impacts during construction. As outlined by Code of Maryland Regulations (COMAR) 26.23.03.01, MDE does not require mitigation for permanent wetland impacts less than 5,000 square feet. Wetland impacts from the Selected Alternative will not exceed this threshold. This project is exempted from the statement of findings requirement because it includes a small area of impact and thus is an “excepted action” under DO-77-1. The total wetland impact from fill placement of the Selected Alternative will be less than 0.1 acre.

MDE SWM regulations will be used to prepare and implement a plan to address long-term stormwater runoff. SHA will construct a new SWM pond just north of Citizens Way, and will expand and enhance an existing pond that is owned by Prince George’s County, south of Citizens Way. Existing riparian vegetation in the area of stream channels will be preserved as much as possible to maintain aquatic habitat and provide shading to the stream. Areas designated for access of equipment, and for the removal or disposal of material, will avoid impacts to streams and associated riparian vegetation to the extent feasible. Any temporarily disturbed areas will be restored and re-vegetated.

Although there will be short- and long-term minor adverse impacts to wetlands and surface waters, the temporary and permanent impacts are less than 0.1 acre respectively. These impacts will not constitute a significant impact to Park wetlands and Suitland Parkway will continue to be able to protect and preserve wetlands to extent that they currently are present throughout the length of Suitland Parkway. Therefore, the impacts of the Selected Alternative will not constitute an impairment to wetlands and/or surface waters.

VEGETATION

Impacts to vegetation will include the clearing of approximately 20.7 acres of vegetation, including grass, shrubs, and approximately 4.7 acres of forested area, as a result of grading and excavation. Protection measures and BMPs will be implemented during construction to avoid impacts to park vegetation to the maximum extent possible.

Mitigation for forest impacts within the boundary of the Suitland Parkway will exceed the 1:1 replacement of impacted woodlands requirement laid out by the Maryland Forest Conservation Act. This will occur through a landscape plan implemented following the construction of the Selected Alternative. Under this plan, 5.5 acres of afforestation and reforestation will occur on NPS lands. The landscape plan will incorporate grading and planting trees, shrubbery, and other plants that are visually and historically compatible with the existing historic landscape of the Suitland Parkway. An invasive plant removal plan will also be developed for the project area.

Although there will be short- and long-term moderate adverse impacts to vegetation, adherence to the Maryland Forest Conservation Act and implementation of a landscape plan will protect and enhance the landscape and aesthetic characteristics of the Suitland Parkway within the project area. Thus, ensuring the

long-term ability of Suitland Parkway to serve as an attractive, landscaped gateway, as defined in the NPS 1984 Park Road Standards. Therefore, the impacts of the Selected Alternative will not constitute impairment to vegetation.

WILDLIFE

The Selected Alternative will temporarily impact terrestrial species and their habitat due to construction related disturbances. These disturbances could cause species to relocate to similar suitable habitats in the area. 4.7 acres of forested habitat and less than 0.1 acre of wetland habitat will be permanently disturbed. Species inhabiting these areas will likely reestablish themselves in adjacent areas of sufficient habitat, following the construction of the Selected Alternative. Re-vegetation, in accordance with a landscape plan, will provide for the reestablishment of some species within the project area.

Although there will be short- and long-term minor adverse impacts to wildlife and habitat due to construction of the Selected Alternative, the relatively small area of disturbance and the presence of suitable habitat adjacent to the project area will allow species to relocate and reestablish themselves quickly. Additionally, the implementation of an approved landscape and invasive species monitoring plan will, upon maturity, provide wildlife habitat similar to that which exists within the boundary of Suitland Parkway today. Therefore, the impacts of the Selected Alternative will not constitute impairment to wildlife.

HISTORIC STRUCTURES AND DISTRICTS

Construction of the Selected Alternative will require a land transfer of 6.9 acres from NPS to SHA that will result in a permanent impact to the boundary of the Suitland Parkway. The land is required for grading and excavation, the installation of ramp access to southbound MD 4 from eastbound Suitland Parkway, and the construction of a directional ramp providing access to westbound Suitland Parkway from northbound MD 4. Also, the profile of Suitland Parkway will be widened to four lanes as it approaches the MD 4 overpass. This widening will require the reconstruction of the southside of the Suitland Parkway Bridge over the JBA North Gate which is a contributing resource to the Suitland Parkway Historic District. Per consultation with MHT, the Selected Alternative will result in an *adverse effect* on the Suitland Parkway.

However, the implementation of measures outlined in the previously described MOA, including a land transfer of 12.8 acres from SHA to NPS for property adjacent to Fort Foote, will mitigate impacts to vegetation, hardscape, and aesthetics of the Suitland Parkway. The Selected Alternative will result in a long-term moderate adverse impact to the Suitland Parkway; however, adherence to mitigation measures outlined in the MOA will minimize the effect on the landscape, aesthetic, and cultural characteristics of Suitland Parkway. Therefore, the impacts of the Selected Alternative will not constitute impairment to historic structures and districts.

Cultural Landscapes

Construction of the Selected Alternative will result in permanent impacts to the cultural landscape of the Suitland Parkway. In addition to the impacts presented in the Historic Structures and Districts section, construction of the Selected Alternative will introduce new slopes on the approach to the MD 4 overpass, modify the median areas, and clear existing vegetation in the project area. New ramps and widened pavement will introduce new hardscape within the cultural landscape of the Suitland Parkway, as will the directional ramp affecting east and north views of Parkway. Views will also be impacted from the reconstruction of the Suitland Parkway Bridge over the entrance ramp to JBA North Gate.

The Selected Alternative incorporates design considerations as outlined in the MOA to minimize the impact to the Suitland Parkway cultural landscape. The landscape plan will incorporate grading as well as planting trees, shrubbery, and other plants that are visually and historically compatible with the cultural landscape of Suitland Parkway. Signage, lighting, and surface treatments for the Selected Alternative will also be compatible with the cultural landscape.

Construction of the Selected Alternative will result in long-term adverse impacts to the cultural landscape of the Suitland Parkway; however, mitigation measures outlined in the MOA will minimize the effect on the landscape, aesthetic, environmental, and cultural characteristics of Suitland Parkway. Therefore, the impacts of the Selected Alternative will not constitute impairment to cultural landscapes.