

## **Attachment B: Determination of Non-Impairment**

National Park Service's (NPS) *Management Policies 2006* require an analysis of potential effects to determine whether or not actions would impair park resources. Section 1.7 explains the prohibition on impairment of park resources and values: "While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them."

According to NPS *Management Policies, 2006*, Section 1.4.5, *What Constitutes Impairment of Park Resources and Values*, impairment is "an impact that, in the professional judgment of the responsible National Park Service Manager, would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values." It also states that an impact to any park resource or value may, but does not necessarily, constitute impairment. An impact would be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the park's establishing legislation;
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- Identified in the park's management plan or other relevant NPS planning documents as being of significance.

An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Per section 1.4.6 of *Management Policies, 2006*, park resources and values that may be impaired include:

- The park's scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- Appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- The park's role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and

- Any additional attributes encompassed by the specific values and purposes for which the park was established.

Section 1.4.7 of *Management Policies 2006* states, “[i]n making a determination of whether there would be an impairment, an NPS decision maker must use his or her professional judgment. This means that the decision-maker must consider any environmental assessments (EAs) or environmental impact statements (EISs) required by the National Environmental Policy Act of 1969 (NEPA); consultations required under Section 106 of the National Historic Preservation Act (NHPA), relevant scientific and scholarly studies; advice or insights offered by subject matter experts and others who have relevant knowledge or experience; and the results of civic engagement and public involvement activities relating to the decision.”

NPS *Management Policies 2006* further define “professional judgment” (in the Glossary) as “a decision or opinion that is shaped by study and analysis and full consideration of all the relevant facts, and that takes into account the decision maker's education, training, and experience; advice or insights offered by subject matter experts and others who have relevant knowledge and experience; good science and scholarship; and, whenever appropriate, the results of civic engagement and public involvement activities relating to the decision.”

This determination on impairment of the George Washington Memorial Parkway (GWMP) has been prepared for the Selected Alternative described in Section 2.5.2 Selected Alternative of the *Potomac Yard Metrorail Station Final Environmental Impact Statement* (FEIS). An impairment determination is made for all resource impact topics analyzed for the Selected Alternative that affect the GWMP and the Greens Scenic Area easement (GSAE). The following describes this resource or value for which impairment is assessed and the reasons why impairment will not occur, these include:

- Visual Resources
- Cultural Resources
- Land Acquisitions and Displacements
- Waters of the United States (Wetlands)
- Floodplains
- Ecosystems and Endangered Species
- Soils

Per the *Guidance for Non-Impairment Determinations and the NPS NEPA Process* (2011), this non-impairment determination does not discuss impacts to visitor experience, socioeconomics, public health and safety, environmental justice, land use, or park operations. This non-impairment determination also does not include discussion of impacts to transportation, air quality, noise, vibration, sustainability, safety and security, and utilities, because these resources have no anticipated impacts to the GWMP or GSAE, as documented in the FEIS. Temporary construction impacts, as well as secondary and cumulative effects of the Selected Alternative, are considered along with permanent impacts to each resource reviewed for potential impairment of GWMP or GSAE resources.

## Visual Resources

The Capper-Cramton Act, 46 Stat. 482, approved May 29, 1930, appropriated Federal funds to the National Capital Park and Planning Commission for the expeditious, economic, and efficient development and completion, among other projects, the George Washington Memorial Parkway (GWMP) to include the shores of the Potomac and adjacent lands, from Mount Vernon to a point above Great Falls, Virginia. The GWMP incorporated and continued the intent of the Mount Vernon Memorial Highway (MVMH), which was approved by Congress on May 23, 1928. The purpose of the MVMH, and subsequently the GWMP, is to commemorate the first president, preserve the natural setting of the shoreline of the Potomac River, and provide a high-quality entryway to Washington, DC.

As the natural and cultural integrity of the GWMP is defined by the preservation of scenic and esthetic qualities of the Potomac River valley, impacts to visual resources within the GWMP were reviewed for their potential to impair park resources and values. The overall natural setting of the GWMP will be impacted by removing vegetation west of the Parkway and introducing new man-made visual elements associated with the proposed Metrorail station to the west. These new man-made elements will impact the integrity of the designed historic landscape and degrade the scenic, natural, and historic quality of the site. Through efforts to minimize and mitigate these impacts, the Selected Alternative will not result in an impairment of visual resources.

The GWMP roadway corridor in the study area is characterized by a divided four-lane roadway framed by vegetation, with intermittent views of Potomac Greens neighborhood to the west and the Potomac River and Washington to the east. Specific viewsheds of the project site consist of views from the southbound lanes on the parkway and views west across the roadway that are both characterized by trees and wetland vegetation with views of townhomes in the periphery. Visual quality at GWMP study area viewsheds ranges from moderate to very high. GWMP viewers are drivers on the parkway and users of the Mount Vernon Trail, expecting a primarily natural setting with views of distinctive elements along the GWMP roadway; therefore, the views along the GWMP possess high viewer sensitivity.

Implementation of the Selected Alternative will result in the reduction of visual quality for six of nine viewsheds in the GWMP and GSAE. Viewsheds in the GWMP and GSAE will also be temporarily impacted during construction by the removal of vegetation for construction staging, as well as the location of construction equipment within areas visible from the GWMP and GSAE. Viewsheds in the GWMP and GSAE may also be impacted by secondary and cumulative effects resulting from development in North Potomac Yard that will be catalyzed by the implementation of the Selected Alternative.

These impacts will be minimized and mitigated under the Selected Alternative. The FEIS avoidance, minimization and mitigation measures in Section 3.8 specify that the City of Alexandria will ensure that the design of the Potomac Yard Metro Station and related landscaping, including planting, plant selection and berms, will be done in a manner that mitigates the visual impact of the station on the GWMP and GSAE and includes NPS as a participant in the design process.

The Section 106 Memorandum of Agreement (MOA) provides additional measures, summarized as follows:

- Completion of a current conditions landscape plan by WMATA for all areas of vegetation to be removed from the GWMP and GSAE, prior to construction.

- Restoration of the vegetative screening along the western side of the MVMH/GWMP and along the GSAE in areas used for construction of the undertaking, in a manner consistent with the recommendations in the 2009 Cultural Landscape Report, The Vegetation of the George Washington Memorial Parkway, Central Section: Alexandria to Arlington Memorial Bridge.
- Distribution of any submittals made to the City of Alexandria for review and approval to NPS for review and approval.
- Design and Construction of the station in accordance with approved concept designs.
- Submittal of final design plans for review by NPS and other MOA signatories.
- Establishment of a Net Benefits Agreement between the City of Alexandria and NPS which will be executed concurrently with the issuance of the NPS Record of Decision, the City of Alexandria commits to the following measures to minimize and mitigate visual impacts to the GWMP:
  - Impose limitations on height and other restrictions on items such as materials, signage, and lighting on portions of North Potomac Yard adjacent to the GWMP via ordinance; and, in addition, seek an agreement, if possible, with the property owner to establish the restrictions on heights, signage and lighting as legally binding covenants or easements;
  - Work to ensure that the design of the Potomac Yard Metro Station and related landscaping, including planting, plant selection and berms, will be done in a manner that mitigates the visual impact of the station on the GWMP and includes NPS as a participant in the design process;
  - Work with WMATA to develop a design-build process that enables a higher level of COA involvement with specific high-visibility elements of the station, and incorporates NPS participation into this process; and
  - Work with WMATA to develop alternative construction staging locations that minimize or avoid the use of the GWMP to the extent reasonably practicable.

As landscaping and vegetation used as a visual buffer for the GWMP will be returned to existing condition or better, station design refinements will minimize the visual impacts of the proposed station, and other measures are provided to protect and enhance visual quality. The impacts associated with the Selected Alternative will not impact visual resources to a point where those specific purposes identified in the park's establishing legislation can no longer still be maintained, nor would inhibit the long-term enjoyment of the Parkway. The Selected Alternative will not result in an impairment of visual resources.

### Cultural Resources

As the natural and cultural integrity of the GWMP is defined by the preservation of scenic and esthetic qualities of the Potomac River valley, impacts to cultural resources within the GWMP and GSAE were reviewed for their potential to cause impairment. As a result of minimization and mitigation efforts, the Selected Alternative will not result in an impairment of cultural resources within the GWMP and GSAE property.

The GWMP has three interrelated historic properties that are listed on the National Register of Historic Places (NRHP): the Mount Vernon Memorial Highway (MVMH), the George Washington Memorial Parkway (GWMP), and the Parkways of the National Capital Region, 1913-1965 (PNCR). The GSAE,

which is administered by NPS, is a landscape recently determined eligible for listing in the NRHP by the Keeper of the National Register as a contributing resource for the MVMH/GWMP.

Implementation of the Selected Alternative will impact the three historic properties and the contributing resource to these properties. Implementation of the Selected Alternative will result in the clearance of vegetation on up to 0.33 acre of MVMH, GWMP, and PNCR property and up to 0.78 acre of the GSAE for permanent station facilities and realigned track. Up to 0.33 acre of MVMH, GWMP, and PNCR property and up to 1.94 acres of the GSAE will be permanently used for the station facilities and track realignment. Construction activities will impact up to 0.42 acre of treed area and associated herbaceous vegetation of MVMH, GWMP, and PNCR property and up to 0.83 acre of the GSAE. Up to 0.42 acre of MVMH, GWMP, and PNCR property and up to 3.09 acres of the GSAE will be required temporarily for the construction of the Selected Alternative. The removal of vegetation, both for permanent facilities and temporary construction activities, could compromise the scenic quality of the MVMH, GWMP, and PNCR, as could adding new non-historical elements to the landscape.

The Selected Alternative will not impact any documented archaeological resources.

The Section 106 MOA provides measures to minimize and mitigate impacts to cultural resources, summarized as follows:

- The City of Alexandria shall convey approximately 6.32 acres of the GSAE to the United States in fee in exchange for up to 0.33 acre of land permanently used by the proposed Metrorail Station that is part of the GWMP, MVMH, and PNCR and for up to 1.94 acres of the GSAE to the extent needed for the construction of the station;
- WMATA shall complete a current conditions landscape plan for all areas of vegetation to be removed from the GWMP and GSAE, prior to construction;
- Vegetative screening along the western side of the MVMH/GWMP and along the GSAE in areas used for construction of the undertaking shall be restored, in a manner consistent with the recommendations in the 2009 Cultural Landscape Report, The Vegetation of the George Washington Memorial Parkway, Central Section: Alexandria to Arlington Memorial Bridge;
- Submittals made to the City of Alexandria for review and approval shall also be distributed to NPS for review and approval;
- The station shall be designed and constructed in accordance with approved concept designs;
- Final design plans shall be submitted for review by NPS and other MOA signatories;
- As documented in the Net Benefits Agreement between the City of Alexandria and the NPS, which will be executed concurrently with the issuance of the NPS Record of Decision, the City of Alexandria shall convey \$12 million to the NPS Impact Fund Account to be used to fund compensatory projects;
- A construction protection plan shall be developed in consultation with NPS and SHPO to assure protection of archaeological resources within 100 feet of project impacts; and
- Other provisions shall be established to address preparation and review of documents, professional qualifications, post-review discoveries, treatment of human remains, monitoring and reporting, and other measures.

The Selected Alternative will alter some character-defining features associated with the Park, but these changes will not inhibit the interpretation nor prohibit long-term enjoyment of its resources. Cultural resources of the MVMH, GMWP, and PNCR will be restored following construction of the Selected Alternative, NPS property required for permanent use will be compensated for through equal value property exchange, the landscape will be restored consistent with the Cultural Landscape Report for the GWMP, and measures are provided to protect visual and archaeological resources. As a result, the Selected Alternative will not result in impairment of cultural resources.

#### Land Acquisitions and Displacements

As described in the Capper-Cramton Act, the GWMP would, in keeping with its purpose of commemorating the first president, “afford public control of the banks of the Potomac from Mount Vernon, where he lived, through the National Capital, which he founded, to Great Falls, where the old canal is a valuable relic of his work as an engineer.” Furthermore the Act states that the parkway “be a striking and suitable tribute to the Father of our Nation and one in which the people of America will take just pride and enjoyment.” The Selected Alternative for the Potomac Yard Metrorail Station would not disrupt the continuity of the parkway along its current route connecting Mount Vernon, the National Capital, and its current northwestern terminus at Interstate 495 in Fairfax County. The Selected Alternative would not impact land directly along the banks of the Potomac River that is currently under the control of NPS. However, the Selected Alternative would result in the transfer of land within the GWMP and GSAE. As these impacts will be minimized and mitigated, the Selected Alternative will not result in an impairment of the GWMP’s lands.

The Selected Alternative will require the transfer of up to 0.33 acres of GWMP land along the western edge of the park in the vicinity of the planned Potomac Yard Metrorail Station and up to 1.94 acres of land covered by the GSAE in exchange for 6.32-acre portion of City of Alexandria property currently covered by the GSAE. The Selected Alternative will require temporary easements or permits for construction activities, including vehicular access, staging and material laydown areas. Construction-related impacts are anticipated for up to 0.42 acres of the GWMP and up to 3.09 acres of the GSAE.

To mitigate the impacts of the Selected Alternative to GWMP parkland and adjacent land covered by the GSAE, the City of Alexandria and NPS have prepared a draft package of mitigations that would ensure a net benefit to the GWMP. The complete Net Benefits Agreement between the City of Alexandria and NPS is provided in **Attachment E** and includes measures to maintain the GWMP as a striking and suitable tribute to the Father of our Nation. As outlined in the agreement, the City of Alexandria will impose limitations on height and other restrictions on items such as materials, signage, and lighting on portions of North Potomac Yard adjacent to the GWMP via ordinance. In addition, the City of Alexandria will seek an agreement, if possible, with the property owner in North Potomac Yard to establish restrictions on heights, signage, and lighting as legally binding covenants. The City will also provide funding that NPS may use for:

- Development of Stormwater Management Plan for Daingerfield Island and the adjacent GWMP;
- Repairs and improvements to the Mount Vernon Trail within the City of Alexandria;
- Vegetation survey for the south section of the GWMP;
- Development of Facility Management Plan for the GWMP;
- Implementation of treatment recommendations for the Cultural Landscape Report for GWMP; and

- Development of a Cultural Landscape Report for the GWMP south of Alexandria and implementation of treatment recommendations

By executing a transfer of land from the City of Alexandria to the United States that is of equal or better value than the GWMP land required to accommodate a portion of the planned station, and by establishing a net benefit agreement between the City of Alexandria and NPS to further enhance the parkway, the Selected Alternative would not result in an impairment to park lands.

#### Waters of the United States (Wetlands)

The integrity of the GWMP is described through areas of significance indicated in its National Register of Historic Places (NRHP) nomination from 1995 (NRHP/NRIS ID #95000605) as “community planning and development, landscape architecture, transportation, commemoration, and preservation.” As the significance of the GWMP is defined in part by preservation, impacts to Waters of the United States, or wetlands, within the GWMP were reviewed for their potential to impair park resources and values. As a result of minimization and mitigation efforts, the Selected Alternative will not result in the impairment of wetlands within NPS property.

Two Cowardin wetland classes are present at the site: Palustrine Emergent Wetlands (PEM) and Palustrine Forested/Shrub Wetlands (PFO). Implementation of the Selected Alternative will result in permanent impacts to wetlands on up to 0.12 acre of the GWMP and up to 1.33 acres of the GSAE. Temporary construction activities for the Selected Alternative will impact wetlands on up to 0.27 acre of the GMWP and up to 2.97 acres of the GSAE.

Permanent and temporary construction-related impacts to wetlands will be mitigated as specified in the NPS Statement of Findings for Floodplains and Wetlands, which is summarized as follows:

- Wetlands impacted by temporary construction activities will be restored to original grade and planted with native vegetation.
- Temporary impacts will be restored as soon as practicable after construction in a particular area has stopped. The planted areas of emergent wetlands are anticipated to take one to two growing seasons to fill in. Final monitoring requirements will be determined through coordination with regulatory agencies and details will be included in a mitigation plan approved by NPS.
- Wetland impacts will be compensated through off-site wetland restoration at the Dyke Marsh Wildlife Preserve restoration project located within the GWMP. The total acreage of temporary and permanent impact will be compensated at an approximate 1:1 ratio at Dyke Marsh.

As permanent and temporarily impacted wetlands will be compensated through 1:1 wetland restoration within the GWMP and through on-site restoration of temporarily impacted wetland areas, the Selected Alternative will maintain long-term opportunities to enjoyment and recreation and will help enhance the ecological values of Dyke Marsh. As a result, there will be no impairment to the Park’s wetland resources.

#### Floodplains

As the natural and cultural integrity of the GWMP is defined by the preservation of scenic and esthetic qualities of the Potomac River valley and the significance of the GWMP is defined in part as preservation

by its NRHP nomination, impacts to floodplains within the GWMP were reviewed for their potential to cause impairment. As a result of minimization and mitigation efforts, the Selected Alternative will not result in the impairment of floodplains within NPS property.

The project area lies at a low elevation and the floodplain terrace of the Potomac River. The project area is relatively flat, bounded on the west by upward slopes that lead up to the existing Metrorail tracks. The regulated 100-year floodplain extends from the project area east to the Potomac River and encompasses the GWMP parkland and portions of the GSAE.

Implementation of the Selected Alternative will result in permanent impacts to up to 0.19 acre of 100-year floodplain in the GWMP and up to 0.52 acre in the GSAE. Implementation will result in permanent impacts to up to 0.04 acre of the 500-year floodplain in the GWMP and up to 0.52 acre in the GSAE. Temporary construction-related impacts will affect up to 0.33 acre of the 100-year floodplains in the GWMP and up to 3.04 acres in the GSAE. Temporary construction-related impacts to the 500-year floodplains will affect up to 0.08 acre of the GWMP and 0.05 acre of the GSAE. Construction of the Metrorail station will slightly reduce floodplain function by decreasing the flood storage capacity of the floodplain and reducing the ability of the floodplain to recharge and infiltrate stormwater. This decrease is not expected to change the Base Flood Elevation (BFE) within the study area, however, due to the large width of the Potomac River and its associated floodplains in the vicinity of the project area.

Design features to manage flood conditions at the proposed station include elevation of station facilities, railroad tracks, storage, and utilities above the 100-year and 500-year floodplain areas, and orientation of the station parallel to the direction of floodwater flow, generally following the edge of the floodplain. Mitigation will also include flood-proofing and other design techniques that would prevent the structure from collapsing or being damaged during a flood. The City of Alexandria will offer project specific design recommendations to mitigate floodplain impacts at the permitting stage. Proposed mitigation will be consistent with permitting requirements of the City's floodplain ordinance and any NPS recommendations. As floodplain impacts will be minimized and mitigated through implementation of recommended design elements, the Selected Alternative will not result in impairment.

### Ecosystems and Endangered Species

The 2005 *George Washington Memorial Parkway Corridor Management* defines an element of the significance of the GWMP as “a globally significant natural area for the preservation of biodiversity.” Supporting this description, the 1994 *Resource Management Plan* for the GWMP sets as an objective the management of exotic plants and the monitoring and suppression of the invasive gypsy moth. In light of the definition and objectives described in its management plans, impacts to ecosystems within the GWMP were reviewed for their potential to cause impairment. As a result of minimization and mitigation efforts, the Selected Alternative will not result in the impairment of ecosystems within NPS property.

The project site contains wetland (described above) and treed upland habitat. For the treed upland habitat, the fragmented nature and urbanized location of the study area habitat contribute to poor wildlife habitat, though the existing treed upland habitat may provide a refuge for species adapted to urbanized environments. The pervasive invasive species coverage, combined with the continual disturbance along the edge conditions of the ecosystem, contribute to a low likelihood of unique, uncommon, or highly diverse plant communities. No Federally listed threatened or endangered species and no critical habitats are identified by the U.S. Fish and Wildlife Service (USFWS) within the project area.



Implementation of the Selected Alternative will impact up to 0.33 acre of wetland and upland habitats within the GWMP and up to 1.78 acres of these habitats within the GSAE. Impacts to ecologically sensitive areas and threatened and endangered species are not anticipated to result from the Selected Alternative.

An Invasive Species Management Plan will be developed to address the removal and management of invasive species to improve the quality of natural habitat and mitigate reduction in natural habitat within the station site, new track right-of-way, and construction staging areas. Construction-related impacts, including impacts to soils where temporary access driveways and construction staging are established and temporary clearance of forest vegetation, will be mitigated through restoration in accordance with landscape and planting plans approved by NPS. Post-restoration monitoring will be undertaken in accordance with approved permits.

As mitigation and minimization strategies for impacts to ecosystems will restore present ecosystems while addressing invasive species on impacted NPS properties, the Selected Alternative will not result in the impairment of ecosystems and endangered species.

### Soils

As the natural and cultural integrity of the GWMP is defined by the preservation of scenic and esthetic qualities of the Potomac River valley and the significance of the GWMP is defined in part as preservation by its NRHP nomination, impacts to soils within the GWMP were reviewed for their potential to impair park resources and values. As a result of minimization and mitigation efforts, the Selected Alternative will not result in the impairment of soils within NPS property.

The excavation, construction, and establishment of temporary construction access driveways will result in shallow soil disturbance, soil exposure, and compaction that could cause potential adverse effects on shallow soil permeability, and soil erosion from water and wind. Up to 0.42 acre of soils in the GWMP and up to 3.09 acres of soils in the GSAE will experience temporary construction impacts resulting from the implementation of the Selected Alternative. Construction impacts related to the hazardous and contaminated materials within the affected soils are addressed in the following section, Hazardous and Contaminated Materials.

A layer of clean fill may be necessary in the construction staging area to provide an acceptable working surface prior to site development. This clean fill will be removed so that the area may be restored to its natural conditions. Any wetlands disturbed by the layer of clean fill at the construction staging area will be re-established in accordance with USACE, NPS, and Virginia state agencies guidance. Monitoring measures to ensure establishment and growth of restored vegetation would be conducted in accordance with approved permits.

Alternative construction staging locations will be developed to minimize or avoid the use of NPS parkland to the extent reasonably practicable. To minimize the effects of construction on soil, a sediment and erosion control plan will be developed as part of the construction documents for the site and will require measures needed to minimize impact to the site and surrounding water bodies. Following completion of construction activities, the portions of the GWMP and GSAE land used for construction access and staging will be restored to the former or better condition. The restoration would include removal of fill to prior grade, amelioration of soil compaction, and revegetation. Post-restoration monitoring will be undertaken in accordance with approved permits.

As the soils on NPS properties will be restored to former or better conditions and impacts from staging locations will be minimized using alternative locations, the Selected Alternative will not result in the impairment of park soils.

### **Conclusion**

In conclusion, NPS has determined that implementation of the Selected Alternative will not result in impairment of park resources and values of the GWMP. In reaching this determination, the park's establishing legislation (the Capper-Cramton Act), the NRHP nomination of the GWMP, the 2014 *George Washington Memorial Parkway Foundation Document*, the *George Washington Memorial Parkway Corridor Management Plan*, and the *Resource Management Plan* were reviewed to reaffirm the purpose of the NPS properties, as well as resource values, management goals, and desired future conditions. The potential effects of the Selected Alternative on the natural and cultural integrity of the park were also reviewed and considered. Based on a thorough analysis of environmental impacts described in the FEIS, public comments received, and the application of the provisions of the *NPS Management Policies, 2006*, NPS concluded that the implementation of the Selected Alternative will not result in the impairment of any of the resources and values of GWMP. Although the Selected Alternative entails physical changes and alterations to existing facilities and natural features, the Selected Alternative will include mitigation and minimization measures that will restore or replace natural resources and historic fabric of the parkland and will be in keeping with NPS management policies and goals.