

**NATIONAL ZOOLOGICAL PARK
MASTER PLAN**

3001 Connecticut Avenue, NW, Washington, D.C.

Finding of No Significant Impact

OCT 31 2008

Pursuant to Section 10 of the Commission's Environmental Policies and Procedures, I have evaluated the master plan for facilities and infrastructure in the National Zoological Park at 3001 Connecticut Avenue, NW, Washington, D.C., as shown on NCPC Map File No. 72.00(05.00)42588 . I find that the mitigation noted below is adequate to establish that the plans and activities would not significantly affect the human environment, with the removal of the 300-space parking garage from the master plan. The mitigation actions are:

- The applicant implement erosion and sediment control measures for each project of the master plan in accordance with District of Columbia requirements and the regulations of the Department of the Environment and Department of Health.
- The Smithsonian Institution achieve Memoranda of Agreement with the District of Columbia State Historic Preservation Officer that identify requirements and mitigation to be employed during the individual project development phases, when more detailed design features and effects can be evaluated under the National Historic Preservation Act Section 106 process. The design stages of

individual projects must consider ways to avoid and minimize impacts to the character-defining historic structures and cultural landscape. Review of the master plan by the District of Columbia State Historic Preservation Officer in accordance with the National Historic Preservation Act, Section 106 requirements, has determined the project has an adverse effect but that the changes to cultural components of the environment are limited and are addressed by a National Historic Preservation Act, Section 106 review that has been accomplished to date by the District of Columbia Historic Preservation Office.

Consequently, after review of the environmental assessment, I have determined pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and NCPC's Environmental and Historic Preservation Policies and Procedures that the project would not significantly affect the quality of the human environment.



Marcel Acosta
Executive Director

Background

The Smithsonian Institution (SI) completed an Environmental Assessment (EA) for the master plan to analyze the proposal in conformance with NEPA. The National Capital Planning Commission was the lead federal agency for the evaluation effort in conformance with the Commission's Environmental and Historic Preservation Policies and Procedures (69 FR 41299).

The environmental documentation is consistent with the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508], the National Historic Preservation Act (NHPA) of 1966, as amended, and NCPC's Environmental and Historic Preservation Policies and Procedures.

The District of Columbia State Historic Preservation Office (DC-SHPO) has reviewed and completed its analysis of the plan determining there is an adverse effect resulting from the undertaking. The DC-SHPO has issued its conclusion that more refined and further review of individual actions will be required to complete a review as required by Section 106 of the National Historic Preservation Act. It has been agreed upon by SI and DC-SHPO that each

project of the master plan will be reviewed and concluded with a separate Memorandum of Agreement.

The NCPC will announce this finding of review in compliance with NEPA on its website with the availability of the Finding of No Significant Impact (FONSI). The EA, and comments about the EA analysis, are information that is made available for review at NCPC offices in compliance with the requirements of the National Environmental Policy Act (NEPA) and the Commission's implementing Environmental and Historic Preservation Policies.

NCPC's requirements for a FONSI are set forth in the Environmental and Historic Preservation Policies and Procedures at Section 10(E).

Proposed Action

The proposed action is Commission approval of the proposed master plan for the National Zoo as submitted by the SI. The purpose of the plan is to affirm SI's mission at the National Zoo and provide a physical framework for implementing a strategic concept over the next 20 to 25 years. The plan identifies infrastructure needs and develops an implementation strategy that helps guide renewal of facilities related to animal welfare, research, exhibits, visitors' services, and circulation at the National Zoo.

The plan includes revitalization of older exhibits at the National Zoo. Areas once dedicated to surface parking would be reclaimed and utilized in the development of large, multi-species exhibits similar to the Asia Trail section of the Zoo. This development would distribute visitors more evenly across the National Zoo's facilities. Under the plan, the zoo entrances and visitor service hubs would be consolidated into four entry points. This would include revitalization of the existing Connecticut Avenue entry, the addition of a Mid-Point entry at the current Parking Lot C, the reworking of the Harvard Street Bridge/Beach Drive entry, and the new bus drop-off area at North Road. A new parking structure would also be constructed at the site of the current Parking Lot C. Traffic circles would be installed along North Road at the Connecticut Avenue and Harvard Street Bridge/Beach Drive entrances. Visitor transportation would be interconnected with a surface level tram on North Road, the new bus drop-off area, and an aerial tram with stations near the entry points.

Alternatives considered in the EA review

The EA examines in detail four alternatives; the proposed action, two alternative master plan scenarios, and the no action alternative.

Under the No-Action Alternative, current programs and projects would continue to develop as planned in an incremental fashion. Attendance would grow to exceed the peak levels of 2001 (3 million visitors per year). Ongoing improvements would include building rehabilitation and facility updates related to animal safety, health, and welfare. The renewal of exhibits at the northwest end of the park would carry on with the completion of Asia Trail and Elephant Trails. Because these exhibits are concentrated in the vicinity of the Connecticut Avenue entrance, visitors would congregate in this northwestern quadrant of the National Zoo. Without the availability of the large land areas necessary for the development of inclusive habitats such as the Asia Trail exhibits, additional exhibit planning would continue on a site-by-site basis. The

Connecticut Avenue entrance would be maintained as the primary place for visitor orientation and information; however, visitors would also continue to access the National Zoo by way of ten different pedestrian entrances and one dedicated bus passenger entry.

Other Alternatives Considered during project development.

Alternative A is a plan that involves the development of large, multi-species exhibits throughout the National Zoo, distributing visitors evenly across the National Zoo's facilities. Entrances would be consolidated into three visitor service hubs. This would include revitalization of the existing Connecticut Avenue entry, the addition of a Mid-Point entry, and reworking of the Harvard Street Bridge/Beach Drive entry. The current Bus Lot would be reclaimed for exhibit space. Two turnarounds along North Road would provide flexibility in the circulation systems. An aerial tram would be utilized to connect the lower and upper ends of the National Zoo. The current Amazonia Science Gallery would be modified so that the main entrance would be located on Olmsted Walk. Beaver Valley exhibits and walkways would be redesigned to separate service from visitor circulation and allow universal access

Under Alternative B, the development of large exhibits would occur through selected areas at the National Zoo. This development would attempt to distribute visitors more evenly across the National Zoo's facilities. Older exhibits would be revitalized and the flat land, once used for surface parking, would be developed as exhibits. The entry and arrival sequence would be enhanced and consolidated through the revitalization of two existing visitor entrances, one at Connecticut Avenue, the other at Harvard Street Bridge/ Beach Drive. A smaller dedicated entry for those arriving by bus would be located at Parking Lot B. The current Bus Lot would be reclaimed for exhibit space. A surface tram along the North Road would connect the entries at the upper and lower ends of the park to assist visitors in traversing the National Zoo's steep topography. The Great Ape House would be renovated to provide enhanced visitor services and education space at a central point in the National Zoo. Amazonia Science Gallery would be modified so that the main entrance would be located on Olmsted Walk.

Potential impacts

NCPC staff has found no significant environmental impacts with the proposed action of Alternative C. The EA addresses short-term and long-term, direct, indirect, and cumulative impacts to the natural, cultural, and socio-economic environments. Consistent with NEPA, SI assessed the potential effects of the feasible and practical alternatives in the development of the preferred alternative; Alternative C, which has few minor effects and no major effects.

NCPC staff viewed the analysis and indicated revisions where environmental issues were unresolved in the EA review. The revised EA was issued as the final document. The EA also outlines measures to avoid, minimize, and mitigate impacts under the action alternatives. The master plan has undergone a review of the alternative's potential effects on historic resources, and interested parties have commented upon the master plan, consistent with Section 106 of the National Historic Preservation Act (NHPA). DC-SHPO has made recommendations for further consideration and implementation of individual project proposals, under Section 106 requirements, that are being adhered to by SI.

Alternative C, the proposed action, would include revitalization of older exhibits throughout the National Zoo. Areas once dedicated to surface parking would be reclaimed and utilized in the

development of large, multi-species exhibits similar in form to Asia Trail. This development would distribute visitors more evenly across the National Zoo's facilities. Under Alternative C, the zoo entrances and visitor service hubs would be consolidated into four entry points. This would include revitalization of the existing Connecticut Avenue entry, the addition of a Mid-Point entry at the current Parking Lot C, the reworking of the Harvard Street Bridge/Beach Drive entry, and the new bus drop-off area. A new parking structure would also be constructed at the site of the current Parking Lot C. Traffic circles would be installed along North Road at the Connecticut Avenue and Harvard Street Bridge/Beach Drive entrances. Visitor transportation would be incorporated with a surface level tram on North Road, the new bus drop-off area, and an aerial tram with stations near the entry points.

NCPC staff has identified few environmental impacts. Water resources, cultural resource effects, and transportation effects were found by the evaluation to be potentially the most prevalent effects from the proposed master plan. These are moderate to minimal and are addressed by mitigation through design modifications, best management practices, and revised design approaches that the applicant has incorporated into its submission of the final master plan. Staff also recommends the removal of one proposed parking garage, as presently configured and consisting of 300 underground vehicle spaces, from the master plan. This element presently does not conform to background traffic analysis for possible future year operation, which is required by the transportation management plan requirements of NCPC.

Affects to historical and cultural components of the environment are being addressed through the National Historic Preservation Act, Section 106 requirements, which would be completed by the SI in the further development of individual project planning provided to NCPC and the District of Columbia State Historic Preservation Office for review at a later date, as agreed to by the DC-SHPO in comments on the master plan.

In the proposed plan, the reduction of impervious surfaces throughout the zoo would have a net beneficial impact to water quality. Clearing of undeveloped forest to accommodate the aerial tram and new service road would result in the loss of vegetation and could potentially cause minor adverse impacts to water quality. The creation of the Discovery Zone and stormwater management exhibit at the current Parking Lot D site occurs within areas of potential floodplain that will be more fully examined under compliance with Executive Order requirements, if the plans are implemented. Vegetation effects are addressed through re-planting identified by the master plan. The replacement of impervious surface with a functioning wetland at this location would have a minor long-term beneficial impact to water quality.

Avoidance, Minimization, and Mitigation: During construction, erosion and sediment control measures would be implemented according to District of Columbia requirements and the regulations of the Department of the Environment and Department of Health. Control measures such as sediment trapping, filtering, and other Best Management Practices (BMPs), would help avoid temporary impacts to water quality. Stormwater management would also be detailed on a project by project basis to address long-term runoff and pollutant discharge control. SI, as part of its sustainability goals and conservation mission, is dedicated to incorporating sustainable principles into the building and renovation of animal exhibits and administrative buildings. As part of that initiative, SI will incorporate Low Impact Development methods and other green building practices, including District of Columbia green-building standards, into future designs as projects are further developed in design. NCPC would monitor and maintain implementation of

regulatory and design requirements through its review process for federal projects in accordance with the National Capital Planning Act (40 U.S.C. § 8722(b)(1)) and (d).

For the proposed action, improvements would include the renovation of older exhibits, construction of new entrances to the zoo, installation of new transportation facilities, and construction of new administrative facilities. These improvements would have minor to moderate long-term adverse impacts to the zoo property as they would physically and visually affect several character defining features of the cultural landscape including: spatial organization; circulation networks; small-scale features; and the designed response to the natural environment. As a result, direct and indirect long-term moderate adverse impacts to the cultural landscape could occur.

Under the Section 106 review process criteria, the alternative would have an adverse effect on the National Register-listed National Zoo because some of the actions, such as the addition of the aerial tram and parking structures, would result in changes to the cultural landscape and add non-conforming elements to the viewsheds.

Avoidance, Minimization, and Mitigation: SI has the lead responsibility for complying with the National Historic Preservation Act, when its actions are subject to NCPC review. SI has initiated consultation with the Washington, DC Historic Preservation Office (DC-SHPO) through the Section 106 process of the Act. As a result of this consultation, memoranda of agreement will be sought that identify requirements and mitigation to be employed during the individual project development phases, when more detailed design features and effects under Section 106 can be evaluated. Future design stages of individual projects would consider ways to minimize impacts to character-defining cultural landscape features. With regard to historic structures, the master plan would have minor to moderate long-term adverse impacts to the National Zoo Historic Site. The master plan would also have minor to moderate long-term impacts to the Holt House District in actions affecting its surrounding site.

SI has initiated consultation through the Section 106 process with the DC-SHPO. As a result of this consultation, SI and DC-SHPO agree that SI will conduct Section 106 reviews of individual projects and seek to avoid and, if necessary, minimize and mitigate adverse effects to National Zoo Historic Site and the historic structures on the site. SI will follow the principles outlined in *The Secretary of the Interiors Guidelines for the Treatment of Historic Properties*. NCPC will seek ways to use vegetative screening, if necessary, to minimize its effect on the landscape surrounding the Holt House and any other measures identified as viable to address effects during the Section 106 review as noted in the EA. Furthermore, the Great Flight Cage and Bird House addition are described in the Cultural Resources Assessment dated April 11, 2008 as important zoo resources. SI will continue to consult with the DC-SHPO with regard to the potential significance of these structures as it proceeds through the Section 106 and design review processes on individual projects.

Archeological resources within immediate environs of the zoo may have minor to moderate long-term adverse impacts through the proposed new construction of the master plan. This potentially would physically impact areas of high potential for prehistoric archeological resources. The presence or absence of archeological resources in areas of high potential needs to be verified by testing before ground disturbance begins as noted by the EA.

Avoidance, Minimization, and Mitigation: As the final designs for master plan improvements have not been fully developed, consultation with the DC-SHPO through the Section 106 process would establish appropriate testing and mitigation efforts as initial project design and development is undertaken. SI has submitted the Cultural Resources Assessment to the DC-SHPO for review and will continue to consult with them about archeological potential at the Holt House and Zoo property. Based on comments from the DC-SHPO, SI recognizes that a number of other sites (51NW028, 51NW220, and 51NW216) with archeological potential in the vicinity of the Zoo property have been identified since the preparation of the Cultural Resources Assessment and EA. These sites do not appear to be located in areas of proposed development. However, as SI proceeds with more detailed site design, SI will evaluate archeological potential for each site and consult with the DC-SHPO. For each project that exists in areas of medium or high potential for archeological resources, SI will conduct a Phase I archeological survey and evaluate feasible alternatives for each project to attempt to avoid and, if necessary, minimize and mitigate adverse effects in accordance with Section 106 requirements.

Transportation and parking impacts from the proposed master plan will be present in the implementation of the SI planning. These effects would have long-term moderate adverse and beneficial impacts to traffic, transportation, and parking because of infrastructure and program improvements that would provide additional parking, ease circulation, and reduce visitor/service conflicts. However, as noted, by the EA supporting documentation, traffic levels of service (LOS) at nearby intersections are affected by the planned improvements, but no single road intersection falls below LOS C, except at the lower zoo entrance where LOS D would exist. Access controls at the Zoo are achieved in the revised transportation planning for the master plan that would reduce the congestion to limited instances. Reductions in parking spaces are also required by NCPC in its review of the master plan.

Avoidance, Minimization, and Mitigation: As more detailed preliminary design of improvements to each entry of the proposed master plan is undertaken, SI will coordinate with the District of Columbia Office of Planning (DCOP) and District of Columbia Department of Transportation (DDOT) to more fully implement programs and facilities that promote non-motorized modes of transportation, as specified by the revised TMP. Further, SI has acknowledged that additional support for bicyclists and pedestrian needs at the site will be achieved under efforts for individual zoo construction planning. Additionally, the master plan and EA note the inclusion of traffic circles on North Road will support shuttle systems for both internal and external circulation. With the renewal of Connecticut Avenue and lower entries, SI has committed to additional facilities to support bicyclists and pedestrians such as bike racks, crosswalks, and bike paths to the zoo entry points, and will include the designs for these elements at the Zoo entries. SI will also integrate parking strategies with the development of the parking garages, including use of real-time technologies, and congestion pricing of parking, to encourage the use of alternative modes of transportation during periods of high parking demand, and to better inform visitors about parking at the zoo. Staff parking charges are to be implemented in structured parking development. Finally, the SI will implement a staff parking ratio of 1:4 in allocation of developed parking that adheres to the NCPC Comprehensive Plan and the NCPC staff has recommended the removal of one proposed parking garage, as configured and consisting of 300 underground vehicle spaces, from the master plan. This element presently does not conform to background traffic analysis for possible future year operation, which is specified by the transportation management plan requirements of NCPC.

Government agencies and the public were requested to provide review and comment on the EA during a 30-day public review period that began on May 19, 2008 and concluded on June 19, 2008. The EA was posted on the NCPC website and mailed to interested persons and organizations that had participated in earlier master plan meetings or scoping meetings for the NEPA document. NCPC staff received no direct comments on the EA from persons or organizations during the 30-day open review period for the EA. The SI conducted a series of workshops, design charettes, and interviews with National Zoo, other SI, and Friend of the National Zoo (FONZ) staffs to identify facility needs and determine master plan environmental concerns on a continual planning basis through 2006, 2007 and early 2008.

At the conclusion of the EA commenting period, the SI had received eighteen comments; 16 by e-mail, and two by mail. In addition, four agencies provided written comments. A summary of the comments follows:

- Several responses noted animal welfare should be the primary concern in the implementation of the master plan. Two interested parties indicated that they would like to see the National Zoo become the world's premiere zoo. One individual provided suggestions for new species to bring to the Zoo.
- There were several comments regarding the natural environment. One specifically stated that the implementation of the plan should be eco-friendly, and another supported the replacement of non-native vegetation with native vegetation. One interested party expressed concern with vehicle contamination of runoff into Rock Creek, and wanted a plan to avoid this incorporated into the proposed parking structure. Another comment expressed concern over trash on the sidewalks and streets outside of the National Zoo washing into Rock Creek and suggested the zoo to be responsible for cleaning up trash left by visitors.
- There were two comments in support of the surface tram. There were also two comments in support of the aerial tram, and three comments suggesting the aerial tram not be implemented. Two people cited concerns regarding disturbance to the tree canopy and local birds, and another person did not think people would use an aerial tram. The Woodley Park Community Association expressed concern over noise and changes to the viewshed for the surrounding neighborhoods. Another person, who supported the aerial tram, suggested enclosed cars be used so no objects may be dropped to the ground.
- Comments regarding parking included support of a structured parking deck at Lot C and underground parking at the Connecticut Ave entrance. Another person noted that she did not want to see additional buildings at the Connecticut Avenue entrance, citing that they would impair the entrance to the park as a retreat from the surrounding city. One comment was not in favor of employee parking near the Holt House.
- Four comments received were in support rehabilitation of the Holt House, but two of those were opposed to a greenhouse in the vicinity and another asked that the parking and greenhouse be designed in such a manner that was sensitive to the Holt House historic significance. One individual suggested that the SI staff contact the staff at Montpelier in Orange, VA regarding the rehabilitation work there. The Association of the Oldest

Inhabitants of the District of Columbia also stated that they do not support additional structures surrounding the Holt House.

- Comments were received from the Holt House Preservation Task Force opposing the construction of the greenhouse and additional parking spaces near Holt House. The Task Force disagreed with the statement that the land around Holt House lacks archaeological potential due to excessive grading in the past, stating that pre-development of the zoo photos contradict the assumption. The group also opposed to the construction of the aerial tram, as it would cross Rock Creek.
- Some of the interested public did not support demolition of Great Ape House; and were concerned with the status of the apes if the Great Ape House were to be removed. One comment supported an improved great apes building. Another party stated that the O-line should be kept in place. Several parties expressed support for the Preferred Alternative, and also recognized that funding for the projects could be an issue.

NCPC staff determined the EA adequately addressed the above issues, and the SI has committed to mitigation and design measures that reduce or eliminate many of the above perceived effects.

The District Department of Transportation (DDOT) provided the following comments based on their review of the EA:

Traffic Impacts:

- DDOT requested clarification on the number of additional parking spaces, citing that in the document it states Parking Lot C will accommodate 1,125 additional spaces, and that it states 200 spaces at Connecticut Avenue on p. 57, but 300 spaces throughout the remainder of the document.
- Questioned that adding more parking spaces will not add additional vehicle trips – states that this is contrary to professional assumptions.
- Notes the EA does not provide traffic counts or analysis for existing or future conditions. DDOT would like to see the Transportation Management Plan that is referenced in the EA.
- DDOT was disappointed to learn that 65% of visitors use private vehicles and only 22% use Metro. The agency recommends that the National Zoo develop more options to encourage transit, bicycle and pedestrian modes of transportation.

Pedestrian and Bicycle Impacts:

- DDOT is looking for more consideration given to sidewalks, crosswalks and bicycle paths to access the site to encourage greater use of non-auto transportation.

Parking Structure:

- DDOT is concerned that the new visible and underground parking structures would have a negative impact on surrounding traffic.

Air Quality:

- DDOT believes localized air pollutant emissions will increase because additional parking will result in additional vehicle miles traveled on the network.

The District of Columbia State Historic State Preservation Office provided comments on the EA in letters dated May 12, 2008 and June 10, 2008. These comments are summarized below:

General:

- List of historic structures in the EA does not include the 1965 Great Flight Cage or the addition to the Bird House. These resources should also be evaluated for their historic significance.
- Agrees with the findings in the “Historic Structures” and “Cultural Landscape” sections of the EA as they relate to the Preferred Alternative.
- Points out that Section 106 requires evaluation of alternatives that will avoid adverse effects before alternatives that will merely minimize or mitigate the adverse effects. Section 106 consultation will be required before some of the actions of the Preferred Alternative including, but not limited to: alteration of Olmstead’s primary circulation route, removal of the stone entry piers near the Stone Guard House, and relocation of the Camel Building and Peccaries Building.

Archaeological Resources:

- DC-SHPO does not have a record of consultation on the reconnaissance-level archaeological survey mentioned in the EA, and the work is not cited in the references.
- Sixteen sites of archaeological sensitivity are mentioned in the text, but a map would be helpful in evaluating whether a given alternative would affect these areas.
- Summary in the EA is incomplete; there are three sites present on, or adjacent to the National Zoo. One was incompletely recorded in 1986 and little information is available on it. The three sites include:
 - Prehistoric Site 51NW028 near the Klinge Valley Area south of Porter Street. National Register eligibility is unknown.
 - Prehistoric Site 51NW220 near the Calvert Street Bridge. National Register eligibility is unknown
 - Historic Site 51NW216, much of which is located in Walter Street Park. A portion of the site was sold to the National Zoo and interments were removed. However, cemetery removal is rarely 100% successful, and remains could still exist on the property. This site is eligible for the National Register.
- A recent National Park Service survey of Rock Creek Park identified archaeological sites from every prehistoric and historic period. Results indicate that areas assumed to be disturbed by grading still retain archaeological potential. Furthermore, surveys of historic houses in the area were found to have intact prehistoric sites, indicating that locations like the Holt House grounds may also retain archaeological potential.
- It is recommended that all National Zoo grounds slated for ground-disturbing activities be subjected to a Phase I archaeological survey incorporating geomorphologic analysis. The testing program of areas of high and medium potential should be coordinated with the DC SHPO following initiation of Section106 consultation.

The District of Columbia Office of Planning (DCOP) submitted comments by letter on June 16, 2008. That office indicated that it generally supported Alternative C as the optimal choice for balancing development activities with historic preservation, neighborhood compatibility issues, and access to the park for disabled visitors. The letter cites several policies from the District’s Comprehensive Plan of 2006 in conjunction with suggestions and recommendations. A summary of DCOP comments follows:

General:

- Incorporate sustainable principles into the building and renovation of individual animal exhibits, parking, and administrative buildings.
- Conduct visitor survey to determine number of visitors from out of town vs. local. Encourage more visitors to use transit, walking or biking to access the National Zoo.

Historic Preservation:

- Restates the comments provided by the DC-SHPO.

Transportation and Circulation:

- Data concerning parking capacity is unclear
- Strategies to better mitigate traffic impacts should be included
- Specific facilities for pedestrians, bicyclists and transit users are not sufficiently addressed.

Parking Structures:

- Unclear about number of parking spaces
- Recommends a more thorough investigation and explanation of impacts of additional parking spaces and vehicular trips on air quality inside the park and in adjacent neighborhoods.
- Requests additional analysis to determine impacts on adjacent streets and neighborhoods when parking capacity at the National Zoo is reached, which is stated as 87 days a year. Should use the existing figure of 65% of visitors arriving by automobile to establish goals to shift travel to transit, walking and bicycling.
- Recommends consideration of parking management strategies to encourage the use of alternative modes on the busiest days. Suggestions include real-time parking information, perks for transit users (discounted tickets and free shuttle to the Zoo), and increased parking fees.

Bicycle Facilities:

- Promote bicycle use by offering facilities such as covered bicycle parking near main entrances, and providing bike lanes throughout property. Coordinate with NPS and DDOT to provide connections to Rock Creek Park, and improved facilities on Connecticut Avenue and Harvard Street. Coordinate with DDOT regarding a SmartBike rental station at the Zoo.

Pedestrian Facilities:

- Pedestrian facilities should be developed and improved and planning and safety considerations should be more fully integrated into the design of facilities.
- Recommends wayfinding from transit locations, walkways and promenades at entrances, and protected crossings, traffic control at key crossings, and sidewalks.
- Concerned with the location of the key parking structure and footbridge at the new Mid-Point entry on the north side of North Road. Paths and driveway entrances will encourage uncontrolled crossings of North Road. Suggests consideration to locate the parking garage and roadways to prevent this.

In a letter dated June 19, 2008 the U.S. Environmental Protection Agency offered the following comments on the EA:

With regard to Beaver Valley

- Identified as an “environmentally sensitive area” on p. 33 under Exhibit Renewal at Beaver Valley. Area should be quantified and its contributing features identified.
- EPA requests that the EA address any potential impacts on Beaver Valley due to the proposed “series of bridges, structures, lifts, and ramps”.
- Impacts to Beaver Valley due to the addition of a bridge connecting buildings should also be quantified.
- Proposed actions of new exhibits, walkways, and bridges should be clearly identified and labeled on a map, showing spatial relationships to the environmentally sensitive area and addressing possible impacts.

Vegetation:

- The results of the 2003 survey should be provided and should identifying the number and species of mature trees present as well as their location on the site.
- Quantify the potential impacts to trees of individual projects. Shrubs should also be identified and quantified. The location of these potentially impacted species should be depicted on a map.

Wildlife:

- The area impacted by both the aerial tram and new service road from Amazonia Science Gallery to Bird Hill should be quantified and the impacted wildlife identified.

The National Park Service commented on the EA with a letter on August 1, 2008. General observations were:

- Cultural Resources

Under “Cultural Resources” Page 61, please note that Rock Creek Park is listed on the National Register of Historic Places. The park is architecturally and historically significant under National Register Criteria A and C in the areas of community planning and development, engineering, recreation and landscape architecture. The property’s period of significance, 1828-1951, is defined by the beginning of construction of the C&O Canal and erection of The Arts of Peace sculpture groups. The National Park Service would like to continue to coordinate with the Smithsonian as this project moves forward to ensure that changes at the National Zoo property do not impact the character of Rock Creek Park.

- Visual resource or operational impacts to Rock Creek Park. NPS supports the choice of Alternative C as the preferred alternative as long as new facilities or services do not adversely affect the park. Examples of those effects are-
 - Harvard Street Bridge/Beach Drive - Reconfiguration and revitalization of the entry near Harvard Street and Beach Drive on the east side of Rock Creek. It is imperative that the Natural setting of the park not be impacted.
 - Aerial Tram - If the National Zoo decides to build an aerial tram, we request that it be constructed in such a way that the tram, as well as the stations, is not visible

from Rock Creek Park. We encourage the Smithsonian to follow through on further evaluation of the noise impacts associated with the operation of the aerial tram and to take proper actions to minimize the impact to visitors of Rock Creek Park.

- Lot C - Alternative C calls for an above-ground parking structure to be built on the existing Parking Lot C that would provide for 1,128 spaces. We request that it be constructed in such a way as not to be visible from Rock Creek Park.
- Bus Parking - Alternative B calls for the existing Parking Lot B to be converted to a bus drop off point, reducing the amount of bus parking available. We are concerned that reducing bus parking on National Zoo property increases the likelihood that buses will look for parking outside of the Zoo, such as in Rock Creek Park.
- Planting Plans - The improvements being proposed under Alternative C for the property will have moderate adverse impacts to vegetation, which you have proposed to mitigate by removal of exotic species, installation of native species, and implementing measures for tree protection. We would like to review the planting plans and the tree protection measures as they become available.

The comments provided above have been considered and deliberated upon by the NCPC staff in review of all environmental information regarding the EA and master plan effects and its potential environmental impacts upon the site, its vicinity, the issues highlighted, and the resources noted by all comments. NCPC staff requested the SI respond to all comments, and those responses have been provided to NCPC and are available upon request. Additionally, the master plan has been revised where required to address the concerns and now incorporates elements or actions that are responsive to comments on the plan. Finally, staff in its report to the Commission recommends the removal of one proposed parking garage, as presently configured and consisting of 300 underground vehicle spaces, from the master plan. This element presently does not conform to background traffic analysis for possible future year operation, which is required by the transportation management plan requirements of NCPC.

Standard for evaluation.

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an EA is sufficient and an Environmental Impact Statement need not be prepared if the EA supports a finding that the federal action will not significantly affect the human environment. The regulations of the Council on Environmental Quality define "significantly" as used in NEPA as requiring consideration of both context and intensity of impacts as noted by 40 CFR §1508.27.

Applying the standards, factors, and analysis here, the Executive Director makes the assessment of whether approval of the submitted master plan will "significantly" affect the human environment based on the EA and the mitigation specified by the EA. As to the factor of the context, this is a site-specific action, and the Executive Director looks at the effects on the locale. In regard to intensity, with the mitigation specified in the EA and exhibited in the design drawings for the master plan, the plan minimizes and does not present any major or significant adverse effects.