

**PEIRCE MILL
RESTORATION AND REHABILITATION**

Rock Creek Park
Northwest Washington, D.C.

Finding of No Significant Impact

FEB 25 2010

Pursuant to Section 102(2)(C) of the National Environmental Policy Act, the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and the National Capital Planning Commission's Environmental and Historic Preservation Policies and Procedures, I have evaluated the preliminary and final site and building plans for the restoration and rehabilitation of Peirce Mill, located in Rock Creek Park in Washington, DC, as shown on NCPC Map File No. 3.60(38.00)42982, the January 2010 environmental assessment prepared by the National Park Service, and the comments that the National Park Service received in response, and have determined that the restoration and rehabilitation of Peirce Mill and its site as proposed will not have a significant impact on the human environment.

Proposed Action

The proposed project was generally included in the National Park Service's (NPS) Record of Decision (ROD) for the general management plan/environmental impact statement for Rock Creek Park dated June 6, 2007. The ROD determined that NPS would "[rehabilitate] the Peirce Mill complex to focus on the history of milling and land use in the area. This would expand on the already completed rehabilitation of the Peirce Mill Barn."

NPS plans to restore and reconstruct Peirce Mill and its site to reflect the early history of agriculture and industry on Rock Creek. The mill has been interpreted as a living history museum for decades, but has not been in good condition or working order in recent years. The mill will be returned to active use through the reconstruction of the breast wheel and the extension of up to approximately 65 feet of the headrace following the course of the 1930s-era millrace to a depth of six feet. The mill race no longer opens to Rock Creek at the Peirce Mill dam. For the millrace, the water power system will be modified to have a closed-circulation pumping system in the basement of the mill that will create a water flow sufficient to operate the mill wheel. The closed system will be refilled from the city water supply to replenish water during dryer seasons. Excess water in the headrace, from rainfall conditions, will

overflow into the tailrace. Water will not be taken from Rock Creek. The grade against the southeast elevation of the mill will be lowered slightly to allow for handicap access. Modest repairs to the exterior will be made, including the addition of water-tight fittings on the inside of the basement door and windows on the southeast side of the mill to mitigate potential future flooding.

The proposed landscape plan has been guided by a recently completed Cultural Landscape Report, by the environmental assessment, and by historic preservation consultation. NPS will recreate a millyard in the location in which it once existed, between the mill and Peirce Barn. The barn lies to the north (uphill) of the mill. The original millyard site is currently a paved parking lot. A more authentic appearance will be achieved through the recreation of the millyard, and the site will be safer for visitors, especially children, when cars no longer have access to the area between the mill and the barn. The wide Tilden Street curb cut that provides access to the parking lot will be closed and the curb and sidewalk restored. The recreated millyard will have a geotextile grid block foundation underneath the soil surface. The blocks will stabilize the soil in order to create a surface that is accessible. The portion of the current paved parking lot not reused for the millyard will be replanted with native grasses.

The ten-space parking lot will be removed and nine spaces will be added a short distance across Tilden Street, NW by expanding NPS's Grove 1 parking lot at the park picnic pavilion and comfort station. Bicycle racks will be added here and elsewhere within the project site. A safer and more visible crosswalk alignment for the pedestrian route across Tilden Street, NW will be constructed as one of possibly several traffic calming measures, which will be coordinated with DDOT, since Tilden Street, NW, is under the jurisdiction of the District of Columbia.

The (closed) restroom adjacent to the barn will be removed. Visitors will use the comfort station at the picnic pavilion until a new, accessible restroom is built near the barn in a future project phase.

To the north of Peirce Barn (on the far side of the barn from the mill), a proposed one-way paved driveway loop from Tilden Street, NW will provide a curbside drop-off lane for a school bus and two handicap parking spaces. The historic agricultural character will be enhanced and the driveway screened by the planting of flowering trees and the installation of a split-rail fence. The landscape plan does not preclude the installation of a sidewalk in this area in future if warranted. NPS anticipates an increase in school group visitation. Bus service to the site will occur on a scheduled basis only, with the limit of one bus on the site at a time. In the event that the arrival of scheduled buses overlap, the additional buses will stage at the tennis facility located .1 mile east of the mill on Park Road, NW. Buses will not be allowed to park or queue on any District roadway.

Various non-historic asphalt paths through the site will be removed and accessible paths will be constructed in suitable, pervious materials. The location and dimensions of the original millrace will be outlined in stone across the grass. The multi-use trail along Rock Creek will be realigned in a more direct line closer to the creek, with pedestrian path connections to the site. The reconstruction and potential widening of the multi-use trail is the subject of a separate, on-going environmental assessment by NPS and DDOT, and may result in future changes to the path and infrastructure.

During the public comment period for the EA, NPS received comments from a nearby resident in support of the project; from the District of Columbia Water and Sewer Authority (DC WASA) requesting coordination in the installation of service lines and a fire suppression system; from DC OP requesting clarification of park boundaries and a paper street through the site, the need for a bus queuing plan, the need for additional and well-dispersed bicycle racks, and the need for continuing coordination with DDOT during the construction of the pedestrian crosswalk on Tilden Street, NW and the multi-purpose trail; and from the Friends of Peirce Mill recommending minor corrections to the EA text. NPS responded to these comments in its Finding of No Significant Impact (FONSI) and an errata sheet, issued on February 19, 2010. DC OP confirmed on February 21, 2010 that NPS's responses addressed its comments.

NPS prepared an environmental assessment to analyze the project design at a more detailed level than what was included in the previous EIS. During development of the site and building plans and the January 2010 Peirce Mill EA, NPS consulted with the National Capital Planning Commission (NCPC), the District of Columbia State Historic Preservation Office (SHPO), the U.S. Commission of Fine Arts, the District of Columbia Office of Planning (DC OP), the District Department of Transportation (DDOT), and the Friends of Peirce Mill. NPS mailed hard copies of the EA to interested citizens, organizations, and agencies, and posted the EA on its public comment website. The EA analyzed a no-action alternative and three build alternatives.

At its December 2009 meeting, NCPC commented favorably on the concept design for the restoration and rehabilitation of Peirce Mill and its site. NPS selected its environmentally preferred alternative and has submitted it to the Commission for review of final site and building plans at the March 4, 2010 meeting.

NCPC staff participated throughout the Section 106 consultation for this undertaking and concurs with NPS's determination of no adverse effect, with the conditions established in consultation with the SHPO for further monitoring and review. Section 106 consultation has concluded with a finding of *No Adverse Effect* for the proposed work on the mill and the site, with the conditions that all work on the mill be consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties, that hardscape be minimized to retain the agricultural character of the site, that a Phase I archaeological investigation in the area of new parking loop be undertaken to determine if resources are present, that all efforts be made to screen the bus pull-off area with landscaping to minimize its visual intrusion on the historic setting, and that the final plans, including such details as paving materials and locations, be subject to final SHPO review.

Standard for evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental and Historic Preservation Policies and Procedures, an environmental assessment is sufficient and an Environmental Impact Statement need not be prepared if the environmental assessment 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. The intensity factor is evaluated above. As to the factor of the context, this is a site-specific action, and the above analysis also considers the effects on the locale.

Potential impacts

The EA found that the project would provide long term beneficial impacts because it proposes to reduce the overall extent of impervious surfaces in the project area, plant new trees, and improve accessibility to the mill and its setting. The design was vetted and modified to address any potential impacts identified by parties reviewing the project. Short term construction impacts were found to be negligible.



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Executive Director