

**PURPOSE OF  
AND  
NEED FOR THE PLAN**

**DRAFT  
NATIONAL MALL PLAN /  
ENVIRONMENTAL IMPACT STATEMENT  
THE NATIONAL MALL**





# CONTENTS: PURPOSE OF AND NEED FOR THE PLAN

PURPOSE OF AND NEED FOR THE PLAN .....	1
Introduction .....	3
Purpose of the Plan .....	3
Need for a Plan .....	4
Plan Objectives .....	4
The Planning Process and Public Engagement .....	8
The Next Steps .....	8
Foundation for Planning and Management .....	9
The National Mall .....	9
Purpose .....	9
Significance.....	10
Fundamental Resources .....	10
Fundamental Values.....	11
Primary Interpretive Themes .....	14
Other Important Resources .....	14
Legal Considerations .....	15
NPS Laws, Regulations, and Policies .....	15
First Amendment Jurisprudence .....	16
Regulating Public Use .....	16
Memorials and the Reserve .....	18
Commercial Activities and Transportation.....	19
Scope of this Document.....	20
Opportunities, Problems, and Challenges .....	20
National Mall Issues and Background .....	21
Specific Area Issues and Background .....	27
Environmental Impact Topics.....	31
Impact Topics Analyzed in Detail .....	31
Impact Topics Dismissed from Further Consideration .....	32
Interrelationships with Other Plans and Projects .....	42
Architect of the Capitol .....	42
National Capital Planning Commission.....	42
District of Columbia .....	44
Smithsonian Institution.....	44
NPS Planning Efforts.....	44
Visitor Transportation Study .....	44
The White House and President’s Park.....	47
Center for Urban Ecology .....	47
Interagency Planning Efforts .....	47
CapitalSpace .....	47
Planning Together for Central Washington.....	48

**PLAN MAPS**

National Mall Plan Area.....5  
 Monumental Core Framework Plan Opportunities ..... 43  
 Urban Design Framework..... 45

**FIGURES**

Figure 1: The National Mall ..... 12  
 Figure 2: Mall Tree Conditions..... 21  
 Figure 3: A National Demonstration at the U.S. Capitol and Union Square ..... 22  
 Figure 4: A Special Event on the Mall ..... 23  
 Figure 5: Recreation on the National Mall..... 25  
 Figure 6: Union Square ..... 27  
 Figure 7: The Smithsonian Metro Station ..... 28  
 Figure 8: Washington Monument Temporary Food/Retail Tent ..... 28  
 Figure 9: Constitution Gardens Lake ..... 29  
 Figure 10: Tidal Basin Walkway..... 30  
 Figure 11: West Potomac Park Riverfront..... 30  
 Figure 12: North Plaza of the Thomas Jefferson Memorial..... 30

**TABLES**

Table 1: Recent First Amendment Case Law Summary ..... 17  
 Table 2: Species of Greatest Conservation Need, Washington, D.C. .... 37

## **ACRONYMS AND ABBREVIATIONS**

ACHP	Advisory Council on Historic Preservation
ADAAG	Americans with Disabilities Act Accessibility Guidelines
AIA	American Institute of Architects
AOC	Architect of the Capitol
ASLA	American Society of Landscape Architects
CEQ	Council on Environmental Quality
CFA	U.S. Commission of Fine Arts
CUE	Center for Urban Ecology (NPS)
CFR	Code of Federal Regulations
DBID	Downtown Business Improvement District
DDOT	D.C. Department of Transportation
FHWA	Federal Highway Administration
GAO	Governmental Accounting Office
GSA	General Services Administration
LCS	List of Classified Structures
LEED	Leadership in Energy and Environmental Design
MWCOG	Metropolitan Washington Council of Governments
NAMA	National Mall and Memorial Parks
NCPC	National Capital Planning Commission
NCR	National Capital Region (NPS)
NHPA	National Historic Preservation Act
NEPA	National Environmental Policy Act
NPS	National Park Service
PMIS	project management information system (NPS)
SCS	Soil Conservation Service
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDI	U.S. Department of the Interior
US EPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USGS	U.S. Geological Survey
USPP	United States Park Police
WABA	Washington Area Bicyclist Association
WMATA	Washington Metropolitan Area Transit Authority
WMATC	Washington Metropolitan Area Transit Commission

This page has been left blank intentionally.

# **PURPOSE OF AND NEED FOR THE PLAN**

This page has been left blank intentionally.



# INTRODUCTION

The National Mall stretches west from the U.S. Capitol to the Potomac River, and north from the Thomas Jefferson Memorial to Constitution Avenue (see the “National Mall Plan Area” map). This highly recognizable space, perhaps the most significant historic landscape in the United States, needs a comprehensive plan to address a number of issues. In 2003 Congress stated that the National Mall is a “substantially completed work of civic art” and that no new or unapproved memorials or visitor centers could be added within the area labeled as the Reserve (40 USC 8901 et seq.). Congress also directed the National Park Service (NPS), as the responsible federal agency, to begin planning for the future of the National Mall. The mandate of the National Park Service is to protect resources and provide for visitor enjoyment.

The National Mall is managed as a unit of the national park system by the National Park Service through the National Mall and Memorial Parks (NAMA); many park areas in central Washington, D.C., are managed by the National Mall and Memorial Parks. The National Mall, which is about 684 acres, received more than 22 million visits in 2008, more than twice the number of annual visits reported for Yellowstone, Yosemite, and Grand Canyon national parks combined (10.9 million visits in 2008). Accommodating this level of use and balancing all types of activities within this limited area present enormous challenges.

The National Mall must function efficiently and flexibly at many levels — as the highly symbolic visual setting for our government; as part of the city’s circulation and transportation network; as the location of the nation’s primary memorials and museums; and as the stage for First Amendment demonstrations, national celebrations, and regional and local special events and activities. The demands on the National Mall are constant and wide-ranging. Each year the National Park Service receives over 6,000 applications for public gathering permits, resulting in around 3,000 events.

The wear and tear of concentrated activity affects the landscape and visitor experiences.

Facilities can be overwhelmed with use, vegetation cannot easily recover, and turf may be worn to the ground and soils heavily compacted, which in turn adversely affects the vigor of trees and other vegetation. Walks are not wide enough for current levels of use, and adjacent areas may be damaged when use spills off walks or when people choose a more direct route. The combined effects generate heartfelt complaints by visitors about the deteriorated appearance of the National Mall.

Planning must take into consideration the unique urban planning environment of Washington, D.C. Multiple agencies have jurisdiction over lands and roads within and adjacent to the plan area. These agencies include the National Park Service, the Architect of the Capitol, the National Gallery of Art, the Smithsonian Institution, and the Department of Agriculture. Other governmental entities with some level of responsibility within or near the National Mall include the General Services Administration (GSA), the District of Columbia, and the Washington Metropolitan Area Transit Authority (WMATA). In addition, governmental organizations such as the U.S. Commission of Fine Arts, the National Capital Planning Commission, and the D.C. Historic Preservation Office have consultation, planning, review, and in some cases approval authority for issues related to planning, historic preservation, commemorative works, and design.

Civic engagement with the public, a vital component of the planning process, has been and will continue to be an open and inclusive process.

## PURPOSE OF THE PLAN

---

The purpose of this planning effort is to prepare a long-term plan that will restore the National Mall so that it may continue to symbolize the ideals and greatness envisioned for the United States of America. The approved plan will serve as an overarching organizational document for subsequent project implementation. Future implementation plans will generally include standard procedures for site-specific design, commission reviews, public engagement, and

historic preservation consultation. As a result, this will be a multiyear and multidisciplinary planning effort. Certain actions may require congressional authorization or revision of federal or park regulations.

Critical to this planning effort is the establishment of a common public understanding of the extent and identity of the National Mall. The National Park Service uses the term National Mall to encompass three specific areas:

- the Mall, which extends from the grounds of the U.S. Capitol to the Washington Monument and includes Union Square
- the Washington Monument and its grounds
- West Potomac Park, which is the setting for numerous memorials, including the Lincoln Memorial, the World War II Memorial, the Vietnam Veterans Memorial, the Korean War Veterans Memorial, the Franklin Delano Roosevelt Memorial, the Tidal Basin, and the Thomas Jefferson Memorial

Often the terms National Mall and the Mall are used interchangeably, and map labeling and references to the National Mall have further created public confusion.

## NEED FOR A PLAN

Comprehensive planning is needed to define the future for the National Mall and to detail specific desired conditions and actions. The approved plan will be similar to a general management plan, which the National Park Service requires for all parks, but it will not address all areas managed by the National Mall and Memorial Parks, so it is more focused than a general management plan. A comprehensive plan for the National Mall is needed for the following reasons:

- Congress has directed the National Park Service to plan for the National Mall within the Reserve so as to preserve its character.
- The National Mall must be refurbished so that (1) its treasured memorials and historic landscapes can be preserved, (2) very high levels of use can be sustained, and (3) the needs of visitors can be met. The National Mall plan must address

- how to improve resource conditions; establish a standard of quality that invites respect and generates stewardship; and raise the standard of care and maintenance
  - how to prepare for intensive levels of use for First Amendment demonstrations, national celebrations, and special events
  - how to provide desired experiences, such as opportunities for education, contemplation, rest, relaxation, recreation, entertainment, and social experiences
  - how to address user capacity, which for this plan is defined as the type and level of visitor use that can be accommodated while sustaining desired resource and visitor experience conditions on the National Mall
  - how to provide for the physical needs, enjoyment, and convenience of visitors and park users, including information, restrooms, food, retail, drinking water, and access
- There may be opportunities for partnership groups to help fund construction, landscape renovation, and maintenance projects.

The need for the plan is further discussed in “Opportunities, Problems, and Challenges” (beginning on page 20).

## PLAN OBJECTIVES

Plan objectives identify what achievements would make the plan successful. The objectives take into account the park purpose and significance, NPS policies, planning principles developed in cooperation with other federal and city agencies with planning responsibilities within the District of Columbia, public comments, and park goals and needs.

- ***Cultural Resource Protection***

Primary east-west vistas and several north-south vistas on the National Mall are improved and perpetuated.

Cultural resources, including memorials and their settings, are preserved and protected.

## **National Mall Plan Area**

This page has been left blank intentionally.

Historic plans for the National Mall are respected. Resources are managed compatibly with the intent of historic plans.

- ***Natural Resource Protection***

Natural resources, such as water, turf, trees/vegetation, and soils, are improved to be part of a sustainable urban ecosystem.

- ***Demonstrations and Special Events***

The National Mall remains a venue for First Amendment demonstrations and national celebrations.

Special events are managed to sustain the health of park resources, to balance the desires of all users, and to ensure a safe environment. No one's enjoyment of the National Mall is unacceptably compromised by others, now or in the future.

Venues and facilities for demonstrations and special events are provided that are compatible with the historic significance of the National Mall, that enhance the experiences of users, and that accommodate operations efficiently and effectively with minimal impacts on nationally significant resources.

- ***Access and Circulation***

Public access and circulation are convenient, and visitors are easily able to find their way to all sites on the National Mall.

The National Mall is better integrated with and connected to the urban fabric of Washington, D.C.

- ***Visitor Information, Education, and Enjoyment***

The National Mall provides the quintessential American experience where visitors can

- feel welcome
- fully understand the importance of this preeminent civic area for First Amendment rights
- learn about our core values as a nation by making an educational, emotional, inspirational, or patriotic connection to

the memorials that commemorate our history and the physical design that reflects our democratic form of government

- appreciate the beauty of the National Mall during the day, at night, and year-round

Lighting on the National Mall evokes emotion and provides enjoyment, while respecting historic fixtures and existing lighting at memorials. The Washington Monument, Lincoln Memorial, and Thomas Jefferson Memorial (as well as the U.S. Capitol and the White House) continue to be the most prominent nighttime features.

Visitor information is convenient, accurate, easy to understand, and consistent throughout the site. Information reaches the widest audience possible.

Visitors understand and appreciate the social experiences they are likely to encounter — millions of people come here to celebrate, commemorate, demonstrate, or recreate.

Learning opportunities are provided to engage all ages and abilities of an increasingly multicultural and technologically sophisticated society. Educational information inspires all visitors, including populations that have not typically visited national parks.

Recreational opportunities are balanced with other uses of the National Mall, and both active and passive forms of recreation meet the needs of visitors, residents, and workers.

- ***Visitor Amenities***

Facilities are of high quality and reflect a compatible and enduring character, thus creating a sense of place that reinforces the civic, historic, and symbolic role of the National Mall to our nation.

Various visitor and commercial amenities are provided that are conveniently located and that are sized and configured to meet visitor use levels on high-volume days.

- **Health, Public Safety, and Security**  
Safe, healthy, secure visits are provided, and visitors have adequate notification of emergency situations.
- **Park Operations**  
Facilities are consistently maintained to the desired standards of excellence.  
All maintenance and park operations emphasize efficient, effective, and sustainable practices.  
Cooperating agencies coordinate planning, information, services, facilities, and programs for visitors, residents, and the local workforce.

## **THE PLANNING PROCESS AND PUBLIC ENGAGEMENT**

In recognition of the importance of the National Mall to many Americans, this planning effort has and will continue to emphasize open and inclusive communications to engage the public and to understand their desires and concerns. Completing the National Mall plan and subsequent implementation plans will require ongoing consultation and coordination with other entities involved in planning and construction efforts.

The planning process and public involvement are described in detail in the “Consultation and Coordination” chapter, beginning on page 543.

## **THE NEXT STEPS**

After the distribution of this *Draft National Mall Plan / Environmental Impact Statement*, there will be a 90-day public review and comment period, after which the NPS planning team will

evaluate comments from other federal agencies, organizations, businesses, and individuals regarding the draft plan. Appropriate changes will be incorporated into a *Final National Mall Plan / Environmental Impact Statement*. The final plan will include letters from governmental agencies, any substantive comments on the draft document, and NPS responses to those comments. Following distribution of the final plan and a 30-day no-action period, a record of decision approving a final plan will be signed by the NPS National Capital regional director. The record of decision will document the NPS selection of an alternative for implementation. Once it is signed, the plan can then be implemented.

The approved National Mall plan will provide a comprehensive vision and framework to protect the historic character of the National Mall, to restore its health and beauty, to help it function better as America’s civic space, and to meet the needs of local, national, and international visitors today and tomorrow for enjoyment, education, and recreation.

However, completing the plan does not ensure that all actions will take place nor ensure funding. The National Park Service requires implementation projects to be within an approved vision plan, and the approved plan will take this important step toward implementation. As the plan is implemented, many of the proposed projects would provide additional opportunities for public involvement. They would undergo reviews by and consultation with the U.S. Commission of Fine Arts, the National Capital Planning Commission, the Advisory Council on Historic Preservation, and the D.C. Historic Preservation Office. Some projects might require congressional action or changes in federal or park regulations.

# FOUNDATION FOR PLANNING AND MANAGEMENT

Park planning and management are based on the legal purposes of a park, its significance, its fundamental resources and values, and its primary interpretive themes. These elements establish a foundation for planning and management so that everyone has a shared understanding of what is most important about the park. It is also important to identify the constraints of special mandates on planning and management. The purpose of the foundation statement is to help ensure that planning and management stay focused on what is most important. All alternatives must be consistent with and contribute to fulfilling the park's purpose, significance, and mandates.

- **Purpose** — The park purpose is the specific reason a park was established by Congress or the president. Purpose statements are grounded in a thorough analysis of the park's establishing legislation or executive order, as well as the legislative history and studies prior to authorization. Purpose statements may go beyond a restatement of the law to document shared assumptions about what the law means in terms specific to the park.
- **Park Significance** — Park significance statements express why the park's resources and values are important enough to warrant national park designation. The statements capture the essence of the park's importance to our nation's heritage and help ensure that managers make decisions that preserve the resources and values for which the park was established or that are necessary to accomplish the park's mission.
- **Fundamental Resources and Values** — These are the most important ideas, tangible resources, or intangible values to be communicated to the public about a park and that warrant primary consideration during planning and management because they contribute to significance and are critical to achieving the park's purpose. A fundamental resource and value is one that was specifically sanctioned by Congress in legislation (such as for a memorial or

monument), an important element or remnant of a historic plan (such as the L'Enfant plan), or an element without which the park would be greatly diminished.

- **Primary Interpretive Themes** — These are the major messages that visitors to a park should receive during their visit, and they connect park resources to relevant ideas, meanings, concepts, contexts, beliefs, and values. They support the desired interpretive outcome of increasing visitor understanding and appreciation of the significance of the park's resources. Primary interpretive themes are based on the park's purpose and significance.
- **Other Important Resources and Values** — Additional resources and values may have particular importance and warrant special consideration during general management planning, even though they do not contribute directly to the purpose and significance of the park.

The five foundational elements for the National Mall plan are presented below. They were developed as part of an NPS Foundation Workshop for the larger National Mall and Memorial Parks held in July 2006. The following purpose and significance statements were derived from court decisions; congressional statements; the laws, regulations, and policies that guide the National Park Service; and other laws and plans for Washington, D.C. (The overarching foundation elements for the National Mall and Memorial Parks that relate to the National Mall plan are included in appendix A.)

## THE NATIONAL MALL

---

### Purpose

The purposes of the National Mall are to

- Maintain the National Mall in the heart of our nation's capital as a stage for national events and a preeminent national civic space for public gatherings because "it is

here that the constitutional rights of speech and peaceful assembly find their fullest expression.”

- Provide a monumental, dignified, and symbolic setting for the governmental structures, museums, and national memorials as first delineated by the L’Enfant plan and further outlined in the McMillan plan, as well as other significant plans.
- Maintain and provide for the use of the National Mall with its public promenades as a completed work of civic art — a designed historic landscape providing extraordinary vistas to symbols of our nation.
- Maintain National Mall commemorative works (memorials, monuments, statues, sites, and gardens) that honor presidential legacies, distinguished public figures, ideas, events, and military and civilian sacrifices and contributions.
- Forever retain the West Potomac Park section of the National Mall as a public park for recreation and enjoyment of the people.
- Maintain the National Mall as an area free of commercial advertising while retaining the ability to recognize sponsors.

## Significance

The National Mall is significant for the following reasons:

- *The National Mall is the home to the enduring symbols of our country.* It provides an inspiring setting for memorials, the backdrop for the legislative and executive branches of our government, as well as a visual connection between the branches of government, represented by the United States Capitol and the White House. The National Mall’s monuments, memorials, statues, and other commemorative works honor important personages, historical events, and the ideals of democracy. As a result, it offers emotional and intellectual connections that affect our national perceptions, consciousness, and identity.
- *The National Mall is the heart of our nation’s capital and has endured since the city’s*

*original design by Pierre L’Enfant over 200 years ago.* The form and character of our planned national capital still reflect the historic L’Enfant and McMillan plans.

- *The National Mall is an inclusive and open environment where we celebrate our national identity and important events.* The National Mall, the nation’s foremost civic space, is the primary location for political demonstrations, First Amendment activities, rallies, parades, and numerous festivals. Visitors of every race, nationality, and faith come to the National Mall to celebrate, commemorate, demonstrate, or recreate.
- *The National Mall is a preeminent national landscape, and its history and appearance have been enriched by gifts to the United States from other countries.* It is a combination of formal designed areas, such as the Mall and the grounds of the Washington Monument, and naturalistic areas, such as the Tidal Basin and West Potomac Park. Various trees and gardens symbolize cultural and diplomatic exchanges and gifts from other nations — such as the Japanese cherry trees, pagoda, and lantern, and the German-American Friendship Garden, and the *Arts of Peace* (gift of Italy).
- *The National Mall is the center of our nation’s cultural heritage.* The National Mall is surrounded by many of the country’s most significant educational and cultural institutions, including the national museums of the Smithsonian Institution and the National Gallery of Art, along with the nearby National Archives, the U.S. Bureau of Engraving and Printing, and the U.S. Holocaust Memorial Museum.

## Fundamental Resources

### Memorials

- Franklin Delano Roosevelt Memorial
- Korean War Veterans Memorial
- Lincoln Memorial and Reflecting Pool
- Thomas Jefferson Memorial
- Ulysses S. Grant Memorial



- Vietnam Veterans Memorial, “In Memory” plaque, *The Three Servicemen* statue, Vietnam Women’s Memorial, catalog listing of names on the wall, the flagpole
- Washington Monument
- World War II Memorial
- 56 Signers of the Declaration of Independence Memorial (Constitution Gardens and Lake)
- D.C. War Memorial
- First Air Mail Flight Marker
- George Mason Memorial
- John Ericsson Memorial
- John Paul Jones Memorial
- Martin Luther King, Jr. Commemorative Plaque — “I Have a Dream” Speech (steps of the Lincoln Memorial)

### **Park Areas**

- Constitution Gardens and Lake
- German-American Friendship Garden
- Mall (1st Street to 14th Streets)
- Tidal Basin — first cherry tree planting, first planting plaque, inlet bridge, Japanese lantern, Japanese pagoda, Kutz Bridge, Outlet bridge, seawall, paddleboat kiosk

### **Statues**

- *Arts of Peace* — Rock Creek and Potomac Parkway entrance (the complementary sculptures, *Arts of War*, are under the jurisdiction of George Washington Memorial Parkway)

### **Views and Vistas**

- Hierarchy of internationally recognized symbolic views and vistas based on the L’Enfant and McMillan plans
- Key vistas defined or framed by vegetation, such as the formal rows of American elms on the Mall, European elms along the Lincoln Reflecting Pool, and cherry trees around the Tidal Basin

- The primary east-west cross axis between the Capitol and the Potomac River and beyond, planned by L’Enfant and symbolizing potential westward expansion of the nation, and the north-south vista from the White House to the Thomas Jefferson Memorial
- The Washington Monument — a pivotal, central element of most views and vistas

### **Plans**

- “L’Enfant Plan of the City of Washington” (1791)
- “Ellicott Plan for the City of Washington in the Territory of Columbia” (1792)
- “Report of the Senate Committee on the District of Columbia on the Improvement of the Park System of the District of Columbia” (Senate Report No. 166, 57th Congress, 1st Session, 1902); hereafter referred to as the McMillan plan

### **Fundamental Values**

- A majestic landscape and a fitting setting for the pomp and ceremony of state events, with the symbolism of strength, power, protection, and safety.
- Free and open public access, both to the physical space (which belongs to all citizens and is under the stewardship of the National Park Service) and to the government.
- The nation’s premier civic space — a venue for First Amendment demonstrations, national celebrations, reflection and contemplation, recreation, and special events; a place to explore values and ideas that reflect how Americans see themselves; an area free of commercial advertising.
- A visible connection between the legislative and executive branches of government.
- The portrayal of our nation’s history in the monuments and memorials that bear testimony to the vision of the founding fathers, and the struggles and sacrifices of extraordinary leaders and ordinary citizens to achieve that vision.

**FIGURE 1: THE NATIONAL MALL**



*The National Mall*

- *the home to the enduring symbols of our country*
- *the heart of our nation's capital*
- *a preeminent national landscape*







- The ideas and values symbolized in commemorative works — freedom of speech, national union, democracy, courage to fight for ideals, citizenship, patriotism, leadership, invention / innovation, international friendship, justice, unity leading to nationhood, and the emotional connections that provide inspiration and healing.
  - The physical and symbolic gateway of the nation’s capital, which was oriented to the west, representing national expansion.
  - Educational opportunities (museums, cultural institutions, NPS interpretive programs).
  - The visibility day and night of the National Mall’s architecture and designed landscapes from the sky.
  - The contribution of the design and architecture to the city’s character, and landmarks that orient visitors to the city.
  - Association with the preeminent names in late 19th and early 20th century landscape architecture, including Frederick Law Olmstead Jr.
  - Healthy green infrastructure, ecosystems, and rivers; recognition that the National Mall is a significant component of the District’s park system.
- the Lincoln Memorial at the west end of the National Mall and the Grant Memorial at the east end, which physically and symbolically represent the re-unification of the nation at the end of the Civil War
  - Land reclamation by the U.S. Army Corps of Engineers and the creation of park lands for a range of recreational uses

### **Other Important Resources**

- Washington Monument flagpoles and U.S. flags, dedication flag, commemorative stones, plaques, elevation obelisk, Monument Lodge (tickets / bookstore), Survey Lodge (ranger station and information), Jefferson pier marker, Sylvan Theater, Bullfinch gateposts
- Museum collections and/or exhibits associated with the memorial sites — George Washington, Thomas Jefferson, Abraham Lincoln, Franklin Delano Roosevelt, and Vietnam Veterans
- Character-defining historic site furnishings — historic seating (NPS standard Washington benches) and lighting (Olmsted plan, Washington globe, Twin Twenty and Saratoga lantern streetlights)
- Lockkeeper’s House for the Washington Canal
- Rainbow Pool Fountain renovated as a central feature at the World War II Memorial
- West Potomac Park — Watergate steps, Constitution Avenue belvedere, riverfront, seawall, and the historic fountain at the George Mason Memorial
- Trails and walks
- Active recreation space and athletic fields for the local workforce, residents, and visitors:
  - ballfields at the Washington Monument and the Franklin Delano Roosevelt Memorial
  - JFK hockey fields
  - Lincoln Memorial volleyball courts and ballfields

### **Primary Interpretive Themes**

- The history of our capital and the story of our nation
- The symbolic nature and unique purposes of civic space in the nation’s capital:
  - First Amendment freedom of speech
  - celebration and patriotism
  - The National Mall and Reserve as a completed work of civic art
  - L’Enfant and McMillan plans
  - Themes directly related to commemorative works:
    - themes common to multiple memorials (presidential legacies, sacrifice, liberty, equality, democracy, freedom, Civil War, etc.)

- activities such as bicycling, kite flying, Frisbee, baseball, softball, kickball, soccer, touch football
- Tidal Basin paddleboats

## LEGAL CONSIDERATIONS

To aid in the discussion about the future of the National Mall, it is important to understand some of the key legal authorities that affect the management of these special areas and that will factor into the planning decisions for the National Mall plan. By no means does this discussion mention all of the authorities that apply. For more information about laws and regulations applying to the National Park Service, see the NPS website at [www.nps.gov/applications/npspolicy/index.cfm](http://www.nps.gov/applications/npspolicy/index.cfm).

### NPS Laws, Regulations, and Policies

#### *The National Park System*

As part of the national park system, the National Mall is administered by the National Park Service. NPS historians describe the National Mall as one of the oldest elements of today's national park system, dating from the creation of the District of Columbia in the 1790s. Knowing why these legal considerations apply is essential to factoring them into planning decisions for the National Mall plan. In this instance, many of these laws and other requirements are applicable because these areas are part of the national park system. As described by the *NPS Management Policies 2006*,

The national park system was created to conserve unimpaired many of the world's most magnificent landscapes, places that enshrine our nation's enduring principles, and places that remind us of the tremendous sacrifices Americans have made on behalf of those principles. They are the most remarkable collection of places in America for recreation and learning. Visitors can immerse themselves in places where events actually happened and enjoy some of the most significant natural and historic places in America. As required by the 1916 Organic Act, these special places must be managed in a special way — a way that allows them to be enjoyed not just by those who are here today, but also by generations that follow (*NPS Management Policies 2006*, p. iii).

Laws, regulations, and authorities that govern the management of the National Mall include those that are applicable to all national parks and to the National Park Service as a federal agency. As explained in the *NPS Management Policies 2006*,

The management of the national park system and NPS programs is guided by the Constitution, public laws, treaties, proclamations, executive orders, regulations, and directives of the Secretary of the Interior and the Assistant Secretary for Fish and Wildlife and Water (*NPS Management Policies 2006*, p. 2).

The National Historic Preservation Act (NHPA), the National Environmental Policy Act (NEPA), the Clean Air Act, and the Clean Water Act are among these laws applicable across the system. Other laws apply to specific situations, such as those for making planning decisions affecting parks in the greater Washington, D.C., area and that involve the National Capital Planning Commission and the U.S. Commission of Fine Arts. Still other laws and requirements apply to just the National Mall, such as those for individual memorials.

#### *NPS Organic and General Authorities Acts*

According to the *NPS Management Policies 2006*, the most important statutory directive for the National Park Service is provided by interrelated provisions of the NPS Organic Act of 1916 and the NPS General Authorities Act of 1970, including amendments to the latter law in 1978. The key management-related provision of the Organic Act (16 USC 1) is as follows:

[The National Park Service] shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

Congress supplemented and clarified these provisions through enactment of the General Authorities Act in 1970, and again through

enactment of a 1978 amendment to that act (16 USC 1a-1). These acts added

[t]he authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.

### First Amendment Jurisprudence

Any governmental regulation of demonstrations and related sales activities is subject to First Amendment jurisprudence. The National Park Service's regulation of demonstrations and sales activities on federal parkland has been the subject of extensive First Amendment litigation for many years.

Recognizing the importance of the National Mall and its nearby monuments and memorials, the United States Court of Appeals for the District of Columbia Circuit stated that "the Mall is more than home to these enduring symbols of our nationhood." The court opinion continues,

Its location in the heart of our nation's capital makes it a prime location for demonstrations. It is where Martin Luther King, Jr., delivered his famous "I Have a Dream" speech, where both sides of the abortion debate have staged their demonstrations, and where on any given day one may witness people gathering to voice their public concerns. As the court has stated before, "It is here that the constitutional rights of speech and peaceful assembly find their fullest expression" (*Friends of Vietnam Memorial v. Kennedy*, 116 F.3d 495, 496 (D.C. Cir. 1997), quoting *ISKCON of Potomac v. Kennedy*, 61 F.3d 949, 952 (D.C. Cir. 1995)).

In the context of such longstanding First Amendment jurisprudence, and consistent with NPS regulations and policies that allow demonstrations and sales activities under certain conditions, as discussed below, demonstrations must be considered to be at least legally consistent with the special nature and sanctity of the National Mall. Other cases involving First Amendment rights are listed in Table 1.

### Regulating Public Use

Regulations in the *Code of Federal Regulations* (CFR) apply to all federal agencies, and certain regulations apply only to the administration of the national park system. The *Code of Federal Regulations* addresses public use limits, which the superintendent may establish based on a determination that limits are "necessary for the maintenance of public health and safety, protection of environmental and scenic values, protection of natural and cultural resources, . . . or implementation of management responsibilities, equitable allocation and use of facilities, or the avoidance of conflict among visitor use activities" (36 CFR 1.5).

Permitted activities "shall be consistent with legislation, administrative policies and based upon a determination that public health and safety, environmental or scenic values, natural or cultural resources, scientific research, implementation of management responsibilities, proper allocation and use facilities, or the avoidance of conflict among visitor use activities will not be adversely affected" (36 CFR 1.6). A permit may be denied if the capacity of the area or facility would be exceeded by one or more of the factors previously listed.

Regulations at 36 CFR 7.96 contain provisions specific to the greater Washington, D.C., area. The following are provisions that center on public uses and figure prominently in the administration of the National Mall.

#### **Demonstrations, Special Events, and National Celebrations**

Demonstrations, special events, and national celebrations are defined as follows (36 CFR 7.96(g)(1)):

- **Demonstrations** — The term includes demonstrations, picketing, speechmaking, marching, holding vigils or religious services, and all other like forms of conduct that involve the communication or expression of views or grievances, engaged in by one or more persons, the conduct of which has the effect, intent, or propensity to draw a crowd or onlookers. This term does not include casual park use by visitors or

**TABLE 1: RECENT FIRST AMENDMENT CASE LAW SUMMARY**

Date	Topic/Issue and Outcome
1972	If one group is allowed to use structures to communicate views, then others must be similarly allowed. <i>Women Strike for Peace v. Morton</i> , 472 F.2d 1273 (D.C. Cir. 1972).
1975	The National Park Service may regulate demonstrations, including permit denial (36 CFR 7.96 (g)) if "enforced uniformly and without discrimination." The National Park Service may not limit the duration of demonstrations in view of the availability of less restrictive methods. <i>A Quaker Action Group v. Morton</i> , 516 F.2d 717 (D.C. Cir. 1975).
1982	The application of NPS camping regulations on the National Mall and in Lafayette Park does not violate the First Amendment. The regulation meets the requirements for a reasonable time, place, or manner restriction of expression, whether oral, written, or symbolized by conduct. The regulation is neutral and narrowly focuses on the federal government's substantial interest in maintaining the parks in the heart of the capital in an attractive and intact condition, readily available to the millions of people who wish to see and enjoy them. <i>Clark v. Community for Creative Non-Violence</i> , 468 U.S. 288 (1984).
1992	A prohibition against the free distribution of leaflets on certain sidewalks within the restricted zone of the Vietnam Veterans Memorial (36 CFR 7.96(j)(2)(vi)) was voided as not "narrowly tailored." <i>Henderson v. Lujan</i> , 964 F.2d 1129 (D.C. Cir. 1992).
1992	A conviction (36 CFR 2.12(a)(1)(i)) for creating an audio disturbance was voided. While the court recognized that the government may justifiably impose sound volume restrictions, the regulation was not "narrowly tailored." <i>United States v. Doe</i> , 968 F.2d 86 (D.C. Cir. 1992).
1995	NPS sales regulations (36 CFR 7.96(k)) were upheld as consistent with the First Amendment. <i>ISKCON of Potomac v. Kennedy</i> , 61 F.3d 949 (D.C. Cir. 1995).
1997	NPS sales regulations were again upheld as consistent with the First Amendment. <i>Friends of the Vietnam Veterans Memorial v. Kennedy</i> , 116 F.3d 495 (D.C. Cir. 1997).
2001	NPS sales regulations were again upheld as consistent with the First Amendment, as well as consistent with Religious Freedom and Restoration Act and equal protections. <i>Henderson v. Kennedy</i> , 253 F.3d 12 (D.C. Cir. 2001).

tourists which does not have an intent or propensity to attract a crowd or onlookers.

- **Special events** — The term includes sports events, pageants, celebrations, historical reenactments, regattas, entertainments, exhibitions, parades, fairs, festivals, and similar events (including such events presented by the National Park Service), which are not demonstrations as previously defined, and which are engaged in by one or more persons, the conduct of which has the effect, intent, or propensity to draw a crowd or onlookers. This term also does not include casual park use by visitors or tourists which does not have an intent or propensity to attract a crowd or onlookers.
- **National celebration events** — The term means the annually recurring special events regularly scheduled by the National Capital Region, including Lighting of the National Christmas Tree and Christmas Pathway of Peace, Cherry Blossom Festival, Fourth of July Celebration, Smithsonian Folklife

Festival, Columbus Day Commemorative Wreath-Laying, and Presidential Inaugural Ceremonies.

Public gatherings or demonstrations involving more than 25 people within the National Mall and Memorial Parks generally require a permit issued by the National Park Service. To preserve an atmosphere of calm, tranquility, and reverence, certain memorial areas exclude demonstrations or special events. These areas include specific portions of the Washington Monument, the Lincoln Memorial, the Thomas Jefferson Memorial, the Vietnam Veterans Memorial, and the World War II Memorial (see 36 CFR 7.96(g)(3)(ii) for specific exclusions).

A permit may be denied if multiple uses cannot be accommodated in the same area at the same time; there is a clear and present danger to the public safety, good order, or health; the proposed demonstration or special event is of such a nature or duration that it cannot reasonably be accommodated in a certain area; or activities are

contrary to other applicable laws or regulations (36 CFR 7.96(g)(4)(iii)).

Permit conditions for demonstrations and special events include how long events may last; hours of operation to avoid unreasonable interference with rush-hour traffic; and allowance of temporary structures erected for the purpose of symbolizing a message or meeting logistical needs (such structures may not unreasonably harm park resources and shall be removed as soon as practicable). Permits for special events are limited to four months. Permits for demonstrations may be extended if space is available (36 CFR 7.96(g)(5)). The regional director may impose reasonable restrictions on the use of temporary structures in the interest of protecting park areas, traffic, and public safety.

Sound amplification equipment is allowed in connection with permitted demonstrations or special events as long as it does not unreasonably disturb nonparticipating persons in, or in the vicinity of, the area (36 CFR 7.96(g)(5)(xii)).

### **Recreational Activities**

Regulations pertaining to recreational activities require permits for organized games such as baseball and football, and for model airplane flying; prohibit athletics if the grounds are wet or otherwise unsuitable for play without damage to the turf; allow fishing in accordance with state law; allow ice skating only in designated areas; and prohibit swimming (36 CFR 7.96(b) through (e)).

### **Soliciting**

Soliciting is allowed if under a permit (*ISKCON of Potomac v. Kennedy*, 61 F.3d 949 (D.C. Cir. 1995)).

### **Sales**

A permit is required for the sale or distribution of books, newspapers, leaflets, pamphlets, buttons, and bumper stickers from a stand or structure during a special event (36 CFR 7.96(k)).

## **Memorials and the Reserve**

Each memorial on the National Mall was placed there pursuant to a specific law or laws enacted by Congress for that particular memorial. Since the mid-1980s the process through which a memorial is authorized, funded, designed, and sited has been governed by the Commemorative Works Act (40 USC 8901 *et seq.*). This law provides standards and requirements for the location, design, and construction of new memorials on federal lands administered by the National Park Service and the General Services Administration in the District of Columbia and a portion of northern Virginia near the District. Provisions of the Commemorative Works Act include those requiring consultation with the National Capital Memorial Commission and for the review and approval of new memorials by the U.S. Commission of Fine Arts and the National Capital Planning Commission. Compliance with this law is informed by memorial guidance plans that have been developed by these commissions and others. Some of the 2003 amendments to this law stemmed from recommendations in these plans that were also presented to Congress in hearings.

The purposes of the Commemorative Works Act include preserving the integrity of the comprehensive design of the L'Enfant and McMillan plans for the nation's capital; ensuring the continued public use and enjoyment of open space in the District of Columbia; preserving and maintaining open space; and ensuring that these memorials are appropriately designed, constructed, and located, and that they reflect a consensus of the lasting national significance of their subjects.

Congress, in the 2003 amendments to the Commemorative Works Act, defined the Reserve as "the great cross-axis of the Mall which . . . generally extends from the United States Capitol to the Lincoln Memorial, and from the White House to the Jefferson Memorial" (sec. 202(a)). The National Mall is located within the Reserve. Frequently, memorials have some visitor facilities such as restrooms, visitor contact stations, and bookstores, but they stop short of being visitor centers both in size and in range and types of facilities they contain. Further, Congress provided that following enactment of the 2003 amendments "no commemorative work or visitor center shall be located within the



Reserve” (sec. 202(b)). This did not include those unbuilt memorials that had been previously approved for sites on the National Mall, such as the Martin Luther King, Jr. Memorial and the Vietnam Veterans Memorial Center.

On December 16, 2003, Congress authorized the establishment of the National Museum of African American History and Culture as part of the Smithsonian Institution and stated that it could be sited in some places on the National Mall. The site selected in January 2006 pursuant to that law is on the Washington Monument grounds, between 14th and 15th Streets NW and Constitution Avenue and Madison Drive NW. At present the site temporarily houses a tent from which an NPS concessioner sells refreshments and sundries. The National Park Service will not be administering this museum or its grounds.

## Commercial Activities and Transportation

The National Park Service Concessions Management Improvement Act of 1998 directs that “except as provided by this title or otherwise authorized by law, the Secretary [of the Interior] shall utilize concessions contracts to authorize a person, corporation, or other entity to provide accommodations, facilities, and services to visitors of the National Park System” (Public Law [PL] 105-391, sec. 403, 112 Stat. 3504). The NPS regulations concerning concessions are found at 36 CFR Part 51.

It is the policy of Congress and the Secretary of the Interior that visitor services in park areas may be provided only under carefully controlled safeguards against unregulated and indiscriminate use so that commercial activities will not unduly impair park values and resources. Development of visitor services is limited to locations that are consistent to the highest practicable degree with the preservation and conservation of the resources and values of the park area. It is also the policy of the Congress and the secretary that development of visitor

services in park areas must be limited to those as are necessary and appropriate for public use and enjoyment of the park area in which they are located.

At present, the National Park Service has a concession contract with Guest Services, Inc., to provide an array of services to visitors to the National Mall. Visitors to the National Mall may also obtain interpretive transportation services through the NPS concessioner known as Landmark Services Tourmobile Inc.

The Department of the Interior and Related Agencies Appropriations Act, 2004 (PL 108-108, Nov. 10, 2003) contains provisions to prohibit the erection, placement, or use of structures and signs bearing commercial advertising at special events on the National Mall (sec. 145). The sponsors of special events may be recognized provided that the size and form of the recognition is consistent with the special nature and sanctity of the National Mall.

The following regulations restrict commercial activities in all units of the national park system:

- **Advertisements** — Commercial notices or advertisements shall not be displayed, posted, or distributed on federally owned or controlled lands within a park area unless prior written permission has been given by the superintendent. Permission may be granted only if such notices and advertisements are found by the superintendent to be desirable and necessary for the convenience and guidance of the public (36 CFR 5.1).
- **Business operations** — Engaging in or soliciting any business in park areas, except in accordance with the provisions of a permit, contract, or other written agreement with the United States, except as such may be specifically authorized under special regulations applicable to a park area, is prohibited (36 CFR 5.3).

# SCOPE OF THIS DOCUMENT

This chapter discusses opportunities, problems, and challenges that the alternatives need to address in order to fully meet the purpose of and need for the plan. Following this discussion is a list of the environmental impact topics that have been analyzed in detail; these topics are based on this discussion of opportunities, problems, and challenges, as well as on federal laws, regulations, and policies, and also on public scoping comments. This chapter concludes with a list of the topics that were dismissed from further consideration because there would be no impacts or because the impacts would be negligible or minor.

Both the National Mall and Pennsylvania Avenue were addressed during the early stages of this planning effort. Because the issues facing these areas are somewhat different, a separate environmental document will be prepared for Pennsylvania Avenue. This is consistent with the *Monumental Core Framework Plan: Connecting*

*New Destinations with the National Mall*, a joint effort of the National Capital Planning Commission and the U.S. Commission of Fine Arts (NCPC 2009).

## OPPORTUNITIES, PROBLEMS, AND CHALLENGES

---

A number of critical issues need to be addressed through comprehensive planning. Areas of public interest and concern include preservation of resources and the historic character, the health and appearance of the National Mall, appropriate uses and levels of use, the impacts of special events and security on public and recreational use, and the challenges of maintaining the National Mall to high standards of excellence.

The most important goal for planning is to define a clear and common vision for balancing use of the National Mall, while achieving desired natural and cultural resource conditions. The

### Ongoing Projects on the National Mall

Several ongoing projects are related to this plan but are beyond its scope because they would be undertaken by other entities or because they have been previously approved and funded and implementation is underway.

When Congress amended the Commemorative Works Act in 2003, it stated that the National Mall is a "completed work of civic art," and it established the Reserve area to protect it (see page 259). The Reserve is to remain free of additional memorials and visitor centers except for the following, which Congress had already approved:

- *Vietnam Veterans Memorial Center* — An underground facility will include restrooms, information, exhibits, administrative space, and a bookstore.
- *National Museum of African American History and Culture* — Land has been transferred to the Smithsonian Institution. The food service and retail functions at the Washington Monument will be relocated.
- *Martin Luther King, Jr. Memorial* — The new memorial will include restrooms, a visitor contact station, and a bookstore.

Memorials are now being considered for sites outside the Reserve. These sites have been identified in the 2001 *Memorials and Museums Master Plan*, which was produced by the National Capital Planning Commission working with the U.S. Commission of Fine Arts and the National Capital Memorial Commission (which includes the National Park Service) as the Joint Task Force on Memorials. Existing memorials on the National Mall will be maintained and protected under applicable law, regulations, and policy.

Five deferred maintenance projects affecting the National Mall have been funded through the American Recovery and Reinvestment Act of 2009. They include the Lincoln Memorial reflecting pool area (lower approachway, pool, and related landscape, plus the north and south elm walks), the D.C. War Memorial, the Thomas Jefferson Memorial plaza seawall, Madison Drive, and Ohio Drive. Also the preferred alternative in the NPS 2006 *Visitor Transportation Study*, which addresses strategies to reduce and manage transportation demand within the area, as well as a visitor transportation service around the National Mall, is under review for future implementation. Other projects include a coordinated National Mall sign system, which has been approved, and the Potomac Park levee project, which will address flood protection for downtown D.C. These projects are considered as present and reasonably foreseeable projects in the cumulative impact analyses in "Environmental Consequences."

NPS presence is not readily apparent on the National Mall, and the agency's stewardship mission and regulations may not be understood.

## National Mall Issues and Background

### Cultural Resources

#### *The National Mall's Evolving History*

**Issue** — To what extent can the evolving history of the National Mall be balanced with the conservation of the historic landscape character, and what desired cultural resource management standards should be achieved?

**Background** — The National Mall concept dates from the 1791 L'Enfant plan) and took its present form as a result of the 1901 McMillan plan and other historically significant plans. Within the National Mall separate park areas have evolved as memorials and have been built to honor famous Americans or to commemorate important events. Planning over the last quarter of the 20th century focused on specific projects, such as memorials. The result has been a fragmented approach that affects our country's premier national historic landscape with its great American symbols of democracy.

Primary vistas that were defined in historic landmark plans, along with large areas of unprogrammed open space that emphasize historic landscape features, may be obscured. For example, the view from the White House to the Thomas Jefferson Memorial is somewhat obscured by trees on the northeast side of the Tidal Basin, and temporary facilities for events on the Mall can sometimes obstruct the view between the U.S. Capitol and the Washington Monument.

#### *The Historic Landscape's Health and Appearance*

**Issue** — To what extent can the highest standards for various landscapes be achieved and sustained while accommodating frequent intensive public use?

**Background** — The National Mall is a symbol of our nation and is expected to exemplify superior standards. Nearly 600 American elms line the Mall and over 2,100 Japanese cherry trees encir-

**FIGURE 2: MALL TREE CONDITIONS**



It takes many years for replacement trees to reach the height of established trees. The bare spots are the result of temporary event facilities.

cle the Tidal Basin. Flower beds are botanical showplaces for thousands of tulips, pansies, and annuals. The impressive mingling of natural and cultural resources has made Washington, D.C., one of the most heavily visited and photographed cities in the world. However, the National Park Service has repeatedly heard from the general public that landscape conditions and maintenance need to be improved.

Turf and trees are generally perceived as renewable resources, but it takes generations to grow the Mall's magnificent shade and ornamental trees, which are important contributing features of the historic landscape. Over the last two decades there has been a substantial loss of tree cover within the District of Columbia, affecting not only air quality and temperature, but also the quality of life. Soil compaction affects the health of trees, as well as the urban ecosystem, and urban flooding.

### Natural Resources

**Issue** — What is the most appropriate way to deal with water quality issues of natural and man-made features, soil and vegetative conditions, flood control, and urban wildlife?

**Background** — Water quality issues affect most water features, such as pools and ponds, and changes in water chemistry have resulted in algae growth. Some pools and ornamental fountains lack proper circulation systems, and the Tidal Basin does not flush as intended. Three major water features (the Lincoln Reflecting Pool, Constitution Gardens Lake, and the

Capitol Reflecting Pool at Union Square) use millions of gallons of potable water each year.

About half of the National Mall has been constructed from tidal flats, and much of the western portion of the National Mall lies within the 100- and 500-year floodplains. Imported soils have often been of poor quality. Additionally, soil compaction and hardened turf areas from high levels of use affect tree root systems, particularly the cherry trees near the Tidal Basin and the American elms on the Mall. Social trails (user-created trails off paved paths) adjacent to formal trails or water edges destroy turf and further compact soils. In 1992 the director of the National Capital Region wrote to the director of the National Park Service about the impact of activities on turfgrass on the Mall:

The only way maintenance efforts can be realized is to restrict the recurrent scheduled activities and heavy visitor use patterns that negate every effort the National Park Service expends to manage the site.

Various urban wildlife species are present, along with less frequently seen fox and deer. Visitors have complained about droppings from resident ducks and Canada geese.

Urban air quality is impacted by vehicular exhaust. Urban sounds, such as traffic and airplane noise, are audible throughout park areas. Water features may mask noise to some degree.

Park managers can do little to prevent global climate change; however, they can take some steps to mitigate its impact. A 3-foot rise in sea levels would affect areas and infrastructure throughout Washington, D.C., including the National Mall. Increased storm severity could result in tidal surges that inundate more park areas.

A U.S. Army Corps of Engineers flood control levee runs north of the Lincoln Reflecting Pool to the Washington Monument grounds. Standards for flood control were modified after Hurricane Katrina, and the levee will need to meet higher standards. As a result, new improvements for the levee are being developed.

Large rainstorms may temporarily exceed the capacity of the stormwater drainage system and result in flooding. There is a high water table as a

result of putting Tiber Creek underground to create Constitution Avenue.

### **Demonstrations, Special Events, and National Celebrations**

*Issues* — Different regulations apply to demonstrations and special events, so the issues are slightly different.

- Within the confines of policy and regulation, to what extent can the ability to accommodate First Amendment demonstrations be improved on the National Mall?
- Within the confines of policy and regulation, to what extent can events be sustainably and efficiently staged on the National Mall while simultaneously achieving desired resource conditions?
- What is the role and physical expression of the civic stage in the 21st century?

*Background* — The National Mall has been referred to as the nation’s front yard, the space where national pageantry, celebrations, cultural events, and demonstrations occur. This highly visible space in the heart of our nation’s capital has evolved into the national forum — the place where large and small demonstrations and rallies take place, and where people can petition their government, present and debate differing positions, advocate for action, or express pride in their identity, organizations, or causes.

Over 3,000 demonstrations and events take place annually on the National Mall, including

- public demonstrations in connection with First Amendment rights

**FIGURE 3: A NATIONAL DEMONSTRATION AT THE U.S. CAPITOL AND UNION SQUARE**



Demonstration organizers frequently choose the National Mall because of its high visibility and recognizable national symbols.



- annual celebrations, such as the National Cherry Blossom Festival, Memorial Day, the Smithsonian Folklife Festival, and the Fourth of July
- regularly scheduled concerts and cultural programs
- hundreds of events such as solar technology displays, book fairs, public employee recognition events, the laying of commemorative wreaths, re-enlistment ceremonies, or school group musical performances, as well as one-time events, such as a state funeral or home building for Hurricane Katrina victims
- annual marathons, triathlons, and foot races benefiting various causes, and hundreds of recreational league team sports

Additionally around 900 commercial filming permits are issued every year.

The sheer number of special events with attendant deliveries and logistics, setup and take-down, and temporary facilities affects landscape health and the ability of the staff to maintain park natural resources such as turf and trees. Significant character-defining elements and historic planned vistas are also affected. Temporary facilities, which include stages, signs, tents, bleachers, portable restrooms, and food service, are frequently located on turf or under tree canopies. Turf may be demolished and its health impacted by compaction that affects water infiltration. Compaction near the roots of trees is detrimental to tree health.

A late 1980s practice of installing 6 inches of mulch under trees was abandoned because of the cost burden of clean up. Instead, mats or temporary surfaces are used in some areas. Temporary walks, which spread weight to reduce soil compaction, at the same time deprive the turf of air and moisture, and in hot weather result in burning of the turf. In 1989 construction trenching of more than 4,400 linear feet severed tree roots on the Mall.

Utility infrastructure is lacking, and tent stakes used during events have penetrated into the irrigation system, rendering the system largely dysfunctional.

**FIGURE 4: A SPECIAL EVENT ON THE MALL**



Tents and other structures are used during special events.



Food tents set up in the elm tree panels on the Mall for a special event.

There are a number of highly visible venues attractive for First Amendment demonstrations because their backdrops contain symbols of our nation. Improvements to access, paving, facilities, or utilities could facilitate demonstrations.

The *Code of Federal Regulations* limits special events (not demonstrations) on the National Mall to four months, including setup and takedown time. This event time limit has not been enforced uniformly. The reservation system for events does not take advantage of current technology.

### **Access and Circulation**

**Issue** — To what extent can public access be improved?

**Background** — The urban streets near the National Mall accommodate around 400,000 commuters every weekday. The road system may be difficult to navigate for infrequent visitors. Crosswalks have limited pedestrian

crossing times. There is a large regional bicycle riding population that commutes and engages in recreational riding. Up to 25% of visitors may not be able to walk long distances or may become exhausted from walking between memorials. There are few amenities for pedestrians walking to the National Mall.

The addition of public transit, including the Metro stop in front of the Smithsonian Castle, and increased nighttime visitation are important changes that were not anticipated by the original planners. Once visitors are on the National Mall, public transit access is limited. Tourmobile provides hop-on/-off service to attractions on the National Mall for \$27 per day. The Smithsonian–National Gallery of Art Circulator provides seasonal service on Independence and Constitution avenues west to 17th Street.

Parking is at a premium within and near the National Mall, with many more vehicles than parking spaces. The National Park Service provides approximately 1,000 free on-street public parking spaces in and around the Mall. About 550 public parking spaces under the Smithsonian Institution museums were closed between 1983 and 1985 for security reasons. The District of Columbia has 200 parking meters on north-south cross streets (3rd, 4th and 7th streets NW/SW). There are 3,750 on-street metered parking spaces with 0.5 mile north and south of the National Mall. Drop-off locations for visitors with disabilities are not always convenient.

Public scoping comments have suggested that underground parking should be provided on the National Mall. Approved plans by the National Capital Planning Commission and the D.C. government envision a transit-oriented future for central Washington to address congestion and insufficient parking. Up to a third of visitors to the National Mall may arrive by tour bus.

The National Park Service has prepared an *Environmental Assessment and Visitor Transportation Study* (NPS 2006c) to continue providing interpretive visitor transportation service that would provide access to museums and other visitor destinations on or near the National Mall and Pennsylvania Avenue. The system would provide more frequent service to destinations, improved connections to public transit, and

links to public transportation. The preferred alternative in the study would be common to all alternatives and has been described under cumulative impacts in the “Environmental Consequences” portion of this document.

### **Visitor Education, Interpretation, and Enjoyment**

#### *The National Mall within a Complex Urban Framework*

**Issue** — To what extent can this national symbolic landscape function efficiently and be compatible with desired experiences of national and international visitors while meeting the needs of federal and city governmental agencies, local residents, and the local workforce?

**Background** — The National Mall is a pilgrimage site for many people, precisely because it is located at the core of our national capital. It symbolizes the openness and diversity of a democratic society, and its design captures the country’s core values and ideals. When it was planned, the National Mall was at the edge of the downtown area, now it is the heart of the city and its role in the city has evolved. The concentration of visitor destinations within the core area and ongoing numerous large-scale gatherings bring vitality to the urban environment, but also complicate maintenance tasks. Landscape conditions are not maintained to the highest standards. Streets accommodate heavy commuter traffic, and a large number of bicyclists use the same walkways as slower pedestrians. To orient people to the city, the Smithsonian makes Tourmobile brochures available at the Smithsonian Castle visitor center, and the NPS Mall kiosk by the Metro entrance is supplied with a Smithsonian-designed Mall map on tear-off pads.

#### *Interpretation / Education*

**Issue** — What kinds of opportunities or improvements in interpretation and education should be made so that park visitors and all Americans can be inspired by the National Mall, as well as understand and enjoy it, and develop a personal stewardship ethic toward supporting its preservation?

**FIGURE 5: RECREATION ON THE NATIONAL MALL**

Portions of the National Mall are regularly used by local residents for informal recreation.

**Background** — Visitors come to the National Mall to experience and learn more about our national capital and the wealth of educational, cultural, civic, and recreational opportunities that it offers, from the many NPS-managed monuments and memorials on the National Mall, to the museums of the National Gallery of Art and the Smithsonian Institution, along with the National Archives, the U.S. Capitol, the Library of Congress, the U.S. Botanic Garden, the Supreme Court, the Bureau of Engraving and Printing, and the U.S. Holocaust Memorial Museum.

Memorials and park areas provide numerous opportunities to learn about commemorative sites, unique features, activities or uses such as demonstrations, and site history. With many international tourists, special efforts are made to communicate with non-English speaking visitors. Educational and interpretive opportunities are affected by the numerous activities that occur within the boundaries of the National Mall, from First Amendment demonstrations to large-scale annual celebrations. Space and time constraints also limit interpretive contacts.

### **Enjoyment**

**Issue** — To what extent can additional opportunities be offered for visitors to enjoy themselves on the National Mall, while respecting the historic design and significance of the area?

**Background** — Inspiration, welcome, and patriotism are components of an enjoyable visit

to the National Mall. Visits may also include programs, performances, demonstrations, sightseeing, and taking pleasure in eating, recreation, or other activities within the context of a nationally symbolic landscape.

### **Recreational Use**

**Issue** — To what extent can recreational uses of the National Mall be achieved in combination with public gatherings and visitation to monuments, memorials, and museums?

**Background** — The National Mall has historically been the location for numerous local recreational activities. Passive recreation, such as picnicking, strolling, or sunbathing, occurs simultaneously with informal or organized activities, such as pickup games and league sports (softball, baseball, football, and soccer). The majority of active recreation occurs on open turf areas, with groups supplying their own equipment, such as goals and bases. The only recreational facilities provided are the paddleboats on the Tidal Basin, seasonal ice skating facilities, and a few locations with backstops or goal posts. Skateboarding is prohibited since it damages memorials, curbing, steps, and walls. Swimming and wading in memorial fountains are also prohibited.

Differing goals may result in safety concerns for various types of users. Out-of-town visitors typically want opportunities for passive recreation and sightseeing, along with access to monuments, memorials, and cultural destinations. Local residents, however, may desire consistent access to public open space that is suitable for active recreation. Large-scale events in particular may interfere with either or both of these uses.

### **Visitor Amenities**

**Issue** — What visitor amenities and services are appropriate? How should the architectural character be unified?

**Background** — The National Park Service provides visitor amenities such as restrooms, bookstores, and concession and food service facilities. Past planning proposed a wider variety of restaurants and food service.

The variety of architectural styles in visitor facilities within the National Mall does not contribute to a unified identity to make them, as well as the NPS presence, readily apparent. Some facilities are outdated and difficult to maintain. Restrooms are insufficient for demand and are not located near food service outlets. Park furniture is not coordinated, and seating is insufficient at some times and is not focused on views. Shaded seating is highly desirable in the summer as is group seating. Shelter is desirable in case of inclement or hot weather.

The use of multiple types of paving throughout the National Mall does not contribute to a sense of place or unified character. Loose paving material, such as gravel, migrates onto paved walks and into grass. Gravel is also slippery to walk on, dust has resulted in complaints, and it makes access difficult for people with disabilities. Existing paving materials may not meet the needs of joggers and bicyclists.

The night sky in Washington, D.C., is dominated by five symbolic icons that focus how people see the city — the U.S. Capitol, the White House, the Washington Monument, the Lincoln Memorial, and the Thomas Jefferson Memorial. Other public and private buildings, memorials or public art, streets and walks, and park areas are lit to varying degrees, with the potential for conflict. There is no written and approved lighting plan to protect the city's nighttime character and provide guidance.

Food service is offered at refreshment stands and mobile carts, and retail items are available at some locations. Public comments indicate that additional commercial visitor services are desired, including recreational opportunities, such as kayaks, rowboats, model boats, and lawn chairs. The alternatives indicate general locations for these types of opportunities. The park must assess the economic feasibility, necessity, and appropriateness of any service changes.

The park must assess the economic feasibility, necessity, and appropriateness of additional commercial services, plus determine the service types and levels that would be offered. Commercial service would be offered using available authorities. Currently authorized visitor services would be continued.

## **Health, Public Safety, and Security**

**Issue** — What health and safety improvements are needed? How do safe, secure visits correlate with the openness that is characteristic of a democracy?

**Background** — The National Mall attracts immense numbers of visitors who need and expect adequate safety, public notification, protection from crime, and the ability to get help if they have health emergencies.

The National Capital Planning Commission and consultants have been involved for many years in reviewing the planning, design, and implementation of security measures throughout the District, even before the events of September 11, 2001. Constructed and proposed interim and permanent measures to protect important national symbols have been criticized for altering the character, openness, and democratic symbolism of the National Mall, and also for not addressing the area comprehensively.

NPS perimeter security projects have been completed or are underway for the Washington Monument, the Lincoln Memorial, and the Thomas Jefferson Memorial. Museums lining the Mall also have perimeter security projects underway or completed.

Highly used areas with many different activities can result in safety concerns or use conflicts. Examples are bicycle use on sidewalks and softball games near areas where people are picnicking or walking. Paving materials make some areas difficult to access for visitors with disabilities, and some furniture does not meet accessibility guidelines for disabled individuals.

Pedestrian waiting areas at some intersections are too small. Street crossing times may be too short for many visitors, and jaywalking is common in some areas. Some pedestrian walks are not lit at night. No lighting and low lighting can contribute to occurrences of criminal activity.

Hot, humid weather and air pollution contribute to visitor discomfort and health issues for the public as well as staff. Weather-related warnings are issued as needed both for the public and staff. Drinking fountains need frequent repairs, and surfaces and basins may not be sanitary.



Plastic water bottles generate a large amount of trash, and recycling is not universal.

The General Services Administration operates an aging steam tunnel / vent system that runs under the National Mall. The system needs extensive repairs. It contributes to excess moisture inside the Washington Monument and can adversely affect nearby trees and vegetation. The vents attract use by homeless people during cold weather. Steam leaks may result in burns.

Shrub beds and other densely planted areas are used for storage and sleeping by the city's homeless population. Federal regulations prohibit camping on the National Mall. Restrooms and fountains may be misused for personal hygiene.

Nighttime visitation has become more common. Public comments have indicated the need for better lighting in some areas.

### **Park Operations**

#### ***Maintenance and Operational Challenges***

**Issue** — What types of facilities, furnishings, or organizational practices would make park maintenance operations more efficient?

**Background** — There is a substantial amount of deferred maintenance on the National Mall, totaling approximately \$508 million. Park staff may not be able to keep up with planned and scheduled maintenance due to multiple, often conflicting and immediate demands. There are over 20,000 light fixtures and various site furnishings, such as bollards, post-and-chain fences, and signs. Park standards are outdated and limited to grounds maintenance; consequently, service improvement opportunities are neglected.

Adequate access for vehicles was never designed, affecting deliveries, trash removal, and grounds maintenance. As a result, vehicles drive over curbs and damage resources, as well as make operations less efficient. Some operations, such as trash removal, can be mechanized to improve efficiencies. There are nearly 900 trash containers, and 3–4 tons of trash are removed daily and up to 32 tons during special events, such as the Fourth of July. Even though eating and drinking are prohibited at memorials, spills,

stains, and gum removal may require special maintenance techniques.

Site furnishings such as signs, bicycle racks, or seating at specific memorials have been custom designed, or they may be contributing elements of historic landscapes and listed on the National Register of Historic Places. Various non-standardized furnishings (such as irrigation systems, mechanical systems for water features, and light fixtures and bulbs) contribute to maintenance challenges because of the need to stock an assortment of replacement parts and for staff to be familiar with multiple maintenance practices.

Communication capabilities for park operations, events, public information/education, emergencies, or media use are inefficient or lacking.

## **Specific Area Issues and Background**

### ***The Mall***

- *Union Square (1st to 3rd Streets)* — The Ulysses S. Grant Memorial needs to be repaired and restored, and the Capitol Reflecting Pool needs to be rehabilitated. The Capitol backdrop makes this a popular venue for demonstrations and events, but there are no amenities or utilities to meet the needs of visitors or demonstrations and special events. The large pool is an obstacle to convenient pedestrian circulation between the Capitol and the National Mall. Multiple levels or grade changes inhibit universal access and include narrow walks that limit pedestrian circulation and park

**FIGURE 6: UNION SQUARE**



Grade level changes at Union Square and deteriorated paving make access difficult for visitors in wheelchairs.

operations. The reflecting pool contains 2.5 million gallons of potable water, but no circulation system, so the water becomes stagnant every summer. The pool is drained and cleaned twice a year. The Architect of the Capitol is responsible for roads surrounding Union Square, including permit parking.

- *The Mall (3rd to 14th Streets)* — The Mall is the designed historic landscape that articulates the vision of the McMillan plan in 1901 and renowned landscape architect Frederick Law Olmsted Jr. in the 1930s. The rows of American elm trees define the view between the Capitol and the Washington Monument and are internationally recognized. The shade provided by the mature elms is much appreciated by visitors during the hot, humid summer. Access to the Mall for million of visitors is by way of the Smithsonian Metro station, the only one within the National Mall. In addition to hosting millions of sightseers, the Mall is heavily used for demonstrations and special events. Resulting soil compaction affects the designed historic landscape and the health of trees and turf, as well as the urban ecosystem. Poor water infiltration may contribute to urban flooding. The Mall lacks restrooms; while restrooms are available in adjacent museum buildings (see appendix D), these buildings have prescribed hours of operation, and visitors need to go through a security check to use them.

**FIGURE 8: WASHINGTON MONUMENT TEMPORARY FOOD/RETAIL TENT**



The temporary refreshment and retail tent for the Washington Monument is at the future site of the National Museum of African American History and Culture.

**FIGURE 7: THE SMITHSONIAN METRO STATION**



The Smithsonian Metro stop has minimal facilities for visitors.



There is an opportunity to improve information for visitors getting off the Metro at the Smithsonian stop.

Gravel-paved walkways make access difficult for some visitors, and gravel migrates onto lawns. The former Adams and Washington drives, which ran parallel to Jefferson and Madison drives, were closed to traffic in 1975 and replaced with wide graveled walkways over asphalt that run along the inner edges of the rows of American elms.

***The Washington Monument and Grounds***

- Celebrations, demonstrations, special events, and recreational activities take place on the monument’s grounds. Food and retail in a temporary tent must be relocated to allow for construction of the National Museum of African American History and Culture on the northeast corner of the grounds. Survey Lodge, the main visitor contact station, is off the main circulation routes and not easy to identify. Circular

restrooms near a tour bus drop off are outdated and inadequate for demand. The north grounds are highly used for demonstrations, special events, celebrations, civic activities, and recreation, but no infrastructure is provided. The south grounds (south of Independence Avenue), which are cut off by park drives and roadways from both the monument and the Tidal Basin, provide recreation fields.

**West Potomac Park (North of Independence Avenue)**

- *World War II Memorial* — No large-scale changes are recommended other than increased education at the World War II Memorial.
- *Constitution Gardens* — The gardens were designed as a resting area for people visiting the memorials. Poor quality soils have stunted tree growth, and the 7-acre concrete-lined shallow lake, which contains 5.5 million gallons of potable water but no circulation system, resulting in water quality problems. Asphalt walks embedded with small stones are deteriorating and are difficult to maintain.

The historic lockkeeper’s house, previously moved to the corner of 17th Street and Constitution Avenue NW, is not being used and requires some preservation. Its location near the intersection affects pedestrian visibility and represents a possible threat to its preservation.

- *Vietnam Veterans Memorial* — No opportunities for contemplation are provided near the memorial.
- *Lincoln Memorial and Grounds* — Multiple tour bus arrivals cause peak-season crowding, and restrooms are inadequate and frequently overwhelmed by demand. Recently opened north and south concession / refreshment stands provide visitor services but no restrooms. Concentric rows of elm trees affect where facilities can be placed. The exhibit area and bookstore are outdated.

Events on the lower approachway require organizers to install temporary utilities and

**FIGURE 9: CONSTITUTION GARDENS LAKE**



Constitution Gardens Lake has water quality problems from a lack of adequate water recirculation. The original 1970s plan included a restaurant at the east end of the lake.

equipment. Issues related to the reflecting pool, approachway, and elm walkways are being addressed under the American Recovery and Reinvestment Act of 2009.

The Watergate area is on the northwest edge of the National Mall, and it has been identified by the National Capital Planning Commission as a location for future national memorials. This area is discussed in the *Monumental Core Framework Plan: Connecting New Destinations with the National Mall* (NCPA 2009). This primary vehicular entrance to the city contains historic features, volleyball courts, and ball-fields. There are proposals by other agencies to rebuild and simplify the road system and celebrate the Constitution Avenue belvedere.

- *Korean War Veterans Memorial* — Narrow entry walks are frequently congested. Visitor walking patterns have changed, and there is no access from the east.
- *D.C. War Memorial* — This small events venue requires major preservation work, which has been funded by the American Recovery and Reinvestment Act of 2009. Use of the area as a performance venue could be enhanced.
- *Ash Woods* — Utilitarian wood fencing, truck and horse trailer parking, and the mobile office at the U.S. Park Police mounted patrol facilities are not in keeping with the historic character of the National Mall. The access road has become a popular pedes-



**FIGURE 10: TIDAL BASIN WALKWAY**



The walkway around the Tidal Basin is frequently flooded by high water.

trian route. The circular restrooms on Ash Road are outdated and hard to maintain; this facility is near the newer restrooms at the World War II Memorial.

**West Potomac Park (South of Independence Avenue)**

- *Tidal Basin Area* — Local streets and parking bisect recreation areas. Commuter and recreational bicyclists share narrow sidewalks with much slower pedestrians.

The Tidal Basin was designed to help flush the Washington Channel to support navigation. Over the last 100 years the flushing capability has been reduced and the basin has silted in. The Tidal Basin gates were replaced in 2007 to help restore the flushing function to the basin, but additional studies and improvements are needed.

The deteriorating Tidal Basin walls are overtopped in some areas by high tides, spilling onto walkways and resulting in social trails as visitors try to avoid the water.

Walkways are too narrow for current levels of use, so the adjacent cherry tree root systems are trampled by visitors. Paddleboats are the only boating choice for recreation, seasonal refreshment and recreation equipment rental facilities are outdated, and no restrooms are available with the exception of those located at the Jefferson Memorial and the Franklin Delano Roosevelt Memorial.

- *Franklin Delano Roosevelt Memorial* — Visitors trample some planting areas to take photos or shortcuts.
- *West Potomac Park Riverfront* — Dry-laid stone river walls are deteriorating and are overtopped by tidewater and debris.
- *Thomas Jefferson Memorial* — The plaza edge is uneven due to the shifting of the Tidal Basin seawalls in front of the memorial, which is being addressed through the American Recovery and Reinvestment Act of 2009. Pedestrian access near the tour bus drop-off area has been controlled to prevent unwanted visitor paths to the Tidal Basin and the memorial. Walks near the Tidal Basin have been relocated so that they are not inundated daily by tides.

**FIGURE 11: WEST POTOMAC PARK RIVERFRONT**



Dry-laid stone riverwalls have deteriorated, and riprap is used in some areas to control erosion.

**FIGURE 12: NORTH PLAZA OF THE THOMAS JEFFERSON MEMORIAL**



Temporary paving repairs have been made on the north plaza to correct problems caused by the settling seawalls. Permanent repairs have been funded through the American Recovery and Reinvestment Act of 2009.

## **ENVIRONMENTAL IMPACT TOPICS**

This management plan develops a vision, or a shared understanding between NPS managers and the public, about the kinds of resource conditions, visitor experiences, and facilities that would best fulfill the purposes of the National Mall. Part of this process is the analysis of environmental impacts. This document identifies the types of impacts that would occur and where.

Impact topics were identified on the basis of federal laws, regulations, and executive orders; *NPS Management Policies 2006*; and NPS knowledge of limited or easily affected resources, as well as public input. A brief rationale for the selection of each impact topic is given below.

### **Impact Topics Analyzed in Detail**

#### **Cultural Resources**

Impact topics were evaluated for archeological resources, historic properties, cultural landscapes, ethnographic resources, Indian Trust resources, and museum collections. It was determined that historic properties (buildings, sites, structures, objects, districts) and cultural landscapes could be affected by the implementation of the alternatives considered in this document, and they are the focus of the discussion of cultural resource impacts.

- Historic properties consist of several types — memorials, buildings, sites, structures, objects (such as statues), and districts.
- Cultural landscapes are defined areas associated with significant events, persons, design styles, or ways of life (such as a park or an estate).

Only properties listed on, or eligible for listing on, the National Register of Historic Places are considered cultural resources for the purposes of this plan.

It was determined that archeological resources, ethnographic resources, Indian Trust resources, and museum collections would be dismissed from further analysis, as explained below.

#### **Natural Resources**

Impacts on soils, water resources (including water quality and quantity, floodplains and

stormwater, and use of potable water), vegetation, and fish and wildlife are analyzed in detail.

#### **Demonstrations, Special Events, and National Celebrations**

Impacts on First Amendment demonstrations, and on celebrations and events are analyzed. The analysis also considers opportunities to participate in demonstrations and events, including knowledge about what is happening, where, and how to participate. The capacities of various venues under each alternative are presented.

#### **Access and Circulation**

The analysis looks at (1) visitor access and circulation, including vehicle access, parking, and transit access (Metro system as well as taxis); (2) the pedestrian environment, including pedestrian experiences on the National Mall and connections to adjacent areas; (3) bicycle use; and (4) motorized uses and the road system.

#### **Visitor Use and Experience**

Impacts are analyzed on a quality visitor experience, which is defined as one that would allow visitors (1) to understand and be able to contemplate core American values, government, and democracy as symbolized by the National Mall's history and memorials, as well as the adjacent cultural institutions; (2) to enjoy a welcoming experience and the beauty of the National Mall, both during the day and at night; and (3) to make emotional or intellectual connections to the National Mall and what it represents. The impacts of opportunities for information and education; for enjoyment, entertainment, and informal recreation; for active recreation are evaluated, along with the impacts of visitor facilities and amenities on the visitor experience. Finally impacts on public health and safety and user carrying capacities are analyzed.

#### **Socioeconomic Environment**

The analysis considers the impacts of increased visitation; impacts on commercial business opportunities, including commercial facilities for recreation and food service, and the type and dispersal of facilities; the impacts of construction opportunities on the local and regional

economy, and visitor costs if free parking is converted to paid parking.

### **Park Operations**

Impacts on park conditions are evaluated in terms of deferred maintenance projects, infrastructure, permitted activities, and staffing. The aspect of efficient and safe operations looks at permit processes for special events, the maintainability of mechanical systems, and best practices for operations that are used for maintaining high-use urban parks. Sustainability is considered in terms of facility design, recycling, water use, renewable energy, and circulation (vehicle trips and congestion).

### **Impact Topics Dismissed from Further Consideration**

The following impact topics were considered, but further analysis showed that there would be no impacts or that the impacts would be negligible to minor.

#### **Cultural Resources**

##### *Archeological Resources*

Archeological resources — the physical evidence of past human activity — can represent both prehistoric and historic occupations. There is little potential for prehistoric sites to occur in much of the National Mall and Memorial Parks due to the fact that much of the area was created by the filling of Potomac River wetlands. In other areas any prehistoric resources would be so deeply buried as to be effectively inaccessible. There may, however, be areas where prehistoric archeological sites remain intact, although minimal archeological investigations have been undertaken.

The infill that created much of the National Mall and Memorial Parks may contain historic debris of archeological interest. Historic archeological features likely remain at each of the monument and memorial sites. Examples might be the foundations of buildings that once existed on the Mall, road traces, the remains of railroad structures and tracks, remnants of old landscape features, and canal structures.

While no complete survey or inventory of archeological resources on the National Mall has been attempted in accordance with section 110 of the National Historic Preservation Act of 1966, as amended, NPS policies and procedures require a professional archeologist to evaluate the possibility of such resources occurring before any ground disturbance. Based on previous archeological work, further testing or excavation may or may not be necessary before ground disturbance. As an additional precaution to avoid inadvertent destruction of archeological resources and to expedite project planning, the National Park Service will coordinate with the D.C. Historic Preservation Office to more thoroughly identify areas where archeological monitoring and testing may be appropriate. Should unexpected archeological resources be discovered during the course of proposed work, NPS policy requires that all work be halted until a professional archeological evaluation of the find can be made and a determination of its significance made.

The NPS regional archeologist of the National Capital Region will determine the efficacy of a complete archeological resource survey of the National Mall in accordance with the National historic Preservation Act and NPS policy. Until then, or in the absence of a complete archeological inventory, these procedures should provide a level of protection for any archeological resources that remain.

Because the National Park Service is required by law and policy to archeologically evaluate any site proposed for development, and because this plan does not entail actions that would affect specific known archeological resources, this topic has been dismissed from further consideration.

##### *Ethnographic Resources*

The NPS *Management Policies 2006* define park ethnographic resources as “the cultural and natural features of a park that are of traditional significance to traditionally associated peoples” (NPS 2006e). Traditionally associated peoples may include contemporary park neighbors as well as ethnic or occupational communities that have been associated with what is now a park for two or more generations (40 years), whose inter-

ests in the park's resources began before the park's establishment and whose cultural heritage and traditional way of life are involved.

Traditionally associated peoples generally differ as a group from other park visitors in that they typically assign significance to ethnographic resources — places closely linked with their own sense of purpose, existence as a community, and development as ethnically distinctive peoples. These places may be in urban or rural parks and support ceremonial activities or represent birth-places of significant individuals, group origin sites, migration routes, or harvesting or collecting places. Although these places have historic attributes that are of great importance to the group, they may not necessarily have a direct association with the reason the park was established or be appropriate as a topic of general public interest. Some ethnographic resources might also be traditional cultural properties. A traditional cultural property is one that is eligible for inclusion in the National Register of Historic Places because of its association with cultural practices or beliefs of a living community that are (1) rooted in that community's history, and (2) important in maintaining the continuing cultural identity of the community (NPS 2006e).

No ethnographic overview and assessment study has been done for the National Mall to identify traditionally associated peoples; however, many park resources have significance to local Washingtonians, veterans, and individuals or groups who associate with the themes of the national memorials. An ethnographic overview and assessment could lead to a review of existing National Register of Historic Places nominations to determine the need for updating to include ethnographic data for traditional cultural property status. Some resources have special associations for specific groups of people. Veterans of conflicts may associate with the World War II, Korean War Veterans, Vietnam Veterans Memorial, or D.C. War Memorial. Asians may associate with the flowering cherry trees along the Tidal Basin, the Japanese lantern, and the pagoda. The Lincoln Memorial has associations for African Americans owing to President Abraham Lincoln's emancipation of slaves, or events that occurred on its steps, such as Marian Anderson's 1939 concert and Martin Luther King Jr.'s 1963 "I Have a Dream" speech.

No American Indian tribes or sacred sites associated with the National Mall have been identified.

Even though an ethnographic overview and assessment have not been completed, preliminary analysis indicates that this plan will not affect those features that have the potential to be determined ethnographic resources. This plan does not propose any actions that would limit access to any of the monuments, memorials, or other features, nor change their cultural meaning to any group. All visitors will continue to have access and use the monuments and memorials as they do now. Permits for events or ceremonies will continue to be issued or denied under current rules and regulations. As a result, this topic has been dismissed from further discussion.

#### *NPS Museum Collections*

The museum collections of the National Mall and Memorial Parks contain both natural and cultural objects. Collections of museum items are preserved either onsite or at the National Capital Region Museum Resource Center.

The Lincoln Memorial collection is made up of approximately 60 objects, only a few of which are actually on exhibit in the museum area, with the rest at the Museum Resource Center. The majority of these objects are related to the construction of the memorial, the installation of the Daniel Chester French statue of Abraham Lincoln or the murals painted by Jules Guerin, objects related to individuals who participated in the construction of the memorial, statue, or murals (ca. 1911–22), and objects related to architect Henry Bacon's involvement in the design and execution of the memorial.

The collection associated with the Washington Monument is made up of objects related to (1) the planning, design, and construction of the monument, including involvement by the Washington Monument Society, the Army Corps of Engineer, and architect Robert Mills, (2) individuals who participated in the construction, and (3) the design, production, and installation of the 191 memorial stones that are set in the interior walls of the monument. All of these objects are housed at Museum Resource Center.

One object from the small Thomas Jefferson Memorial collection is on display at the memorial; the rest of this collection is housed at Museum Resource Center.

The Vietnam Veterans Memorial collection is international in scope and is comprised of more than 100,000 objects that have been left at the memorial wall. The collection includes objects directly related to (1) military activities (dog tags, patches, uniforms and military clothing, combat boots, C rations, discharge papers, photographs, and medals); (2) framed and unframed materials (letters, poems, birth announcements, birthday cards, personal dedications, newspaper obituaries, books, Bibles, family photographs, and Vietnam snapshots); and (3) patriotic-to-protest objects (artificial flowers and wreaths, flags, missing-in-action and prisoner-of-war bracelets, clothing, canes, high school diplomas, records and tapes, teddy bears, liquor bottles, beer cans, and cigarette lighters). The collection also includes objects related to designer Maya Ying Lin's involvement in the design and construction of the monument, along with objects related to the Joel Meisner Foundry's involvement in the design, construction, and installation of the *Three Servicemen* statue. The proposed new Vietnam Veterans Memorial Center will exhibit many of the items in the collection, but the majority will remain at the Museum Resource Center.

Under all alternatives nearly all NPS museum objects will continue to be stored offsite at the Museum Resource Center. A small number of selected museum objects will be exhibited in buildings outside the floodplain. In addition, museum objects will continue to be acquired, accessioned and cataloged, preserved, protected, and made available for access and use according to NPS standards and guidelines (NPS 2000b). Therefore, museum objects would not be affected under any alternative, and this topic has been dismissed from further consideration.

### **Indian Trust Resources**

The Department of the Interior is responsible for protecting Indian trust resources, including tribal lands, assets, resources, and treaty rights, that are held in trust by the Secretary of the Interior for the benefit of American Indians due

solely to their status as American Indians. There are no Indian trust resources on the National Mall. Therefore, this topic was dismissed from further impact analysis.

### **Natural Resources**

#### ***Geology, Paleontology, and Topography***

The District of Columbia lies on the line between the Atlantic Coastal Plain physiographic province on the southeast and the Piedmont province on the northwest. This line roughly follows Rock Creek Park. The National Mall lies in the Atlantic Coastal Plain.

The Atlantic Coastal Plain province borders the Atlantic Ocean and consists of gravel, sand, silt, clay, and marl. Deposition of these sediments began 100 million years ago and continues to the present time. The oldest rocks in the Coastal Plain are poorly consolidated (i.e., easily crumbled) gravel, sand, silt, and clay derived from the weathering of rocks to the north and west that were carried to the Coastal Plain by south-flowing rivers. Younger rocks consist of sands and clays containing the minerals glauconite and mica, which were deposited in estuaries and on the Continental Shelf at a time when water covered the present Coastal Plain to depths of as much as 200 feet (USGS 1999).

The Piedmont Plateau province lies west of the Coastal Plain. Piedmont rocks in and near Washington, D.C., are crystalline metamorphic rocks that are quite hard and resist weathering; they contain veins of quartz and pegmatite, and in many places have been intruded by igneous rock. These crystalline rocks can be seen most easily in valleys where the soil cover has been stripped away by erosion. Most of the crystalline rocks on the uplands were deposited about 550–600 million years ago. Over the ages, they have weathered to saprolite, a porous, spongy, red-brown clay-rich material, as much as 200 feet thick (USGS 1999).

From a surface geology standpoint, most of the study area is identified as disturbed ground and artificial fill. The southern part of the National Mall is low level Pleistocene-era fluvial and estuarine deposits and was originally swampland. It was reclaimed in the late 1800s by fill with material dredged from farther down the river.



The National Mall includes numerous structures built from fossil-bearing rock, such as sandstone, limestone, and marble (metamorphosed limestone) from quarries throughout the country. For example, Indiana limestone (Mississippian-age Salem limestone quarried near Bedford, Indiana) is highly fossiliferous. Marine invertebrate fossils are readily visible in the Indiana limestone used in many structures, such as the Capitol Reflecting Pool. The Lincoln Memorial and other NPS-managed structures also contain fossils in their building stone (NPS 2004c).

Central Washington and the National Mall and Memorial Parks are on a series of terraces that increase in elevation from the Potomac River. The majority of this area reflects the pressures of urban density and growth. The original landform has been highly manipulated to create appropriate settings for government buildings and memorials.

While the action alternatives include construction and landscape management actions, they would occur in previously disturbed areas. Because none of the alternatives presented in this document include any actions of the scale or type that would affect geologic formation, paleontology, or general topography of the area, these topics are dismissed from further analysis.

### *Air Quality*

The planning area is within the National Capital Interstate Air Quality Control Region. While the District of Columbia region has been designated by the Environmental Protection Agency as a “serious non-attainment area” for fine particulate matter, it meets the national ambient air quality standards for other air pollutants.

The General Conformity Rule of the Clean Air Act Amendment of 1990 requires any federal agency responsible for an action in a non-attainment area to determine that the action is either exempt from the conformity rule requirements or that the action conforms to the applicable state implementation plan. The conformity assessment process is intended to ensure that federal agency actions (1) will not cause or contribute to new violations of the national ambient air quality standards; (2) will not increase the frequency or severity of any

existing violations of national ambient air quality standards; and (3) will not delay the timely attainment of ambient air quality standards. An agency may establish that the projected emission rates would be less than specified emission rate thresholds, known as *de minimis* thresholds. If these conditions are met, conformity of a project is presumed.

The problem of urban pollution and acid precipitation (often called acid rain) is of increasing concern in the Washington metropolitan area. Pure, distilled water has a neutral pH of 7. Normal, unpolluted rain is slightly acid, with a pH of 5.6, because the carbon dioxide in air combines with water to form small amounts of a weak acid called carbonic acid. Rainfall in the Washington area has an average pH of 4.2 to 4.4, more than 10 times as acidic as unpolluted rain (USGS 2007). The main source of pollution in the greater Washington region is exhaust from automobiles, trucks, and other forms of transportation. Vehicle exhaust contains nitrogen oxides and sulfur dioxide, which combine with water to form strong acids.

The stones that form many of the buildings and monuments in Washington are limestone and marble, which are vulnerable to acid precipitation because they are predominantly made of the mineral calcite (calcium carbonate), which dissolves easily in acid.

Should any of the action alternatives be selected, local air quality may be temporarily affected by construction-related activities. The operation of construction equipment would result in increased vehicle emissions in a localized area. Volatile organic compounds, nitrogen compounds, carbon monoxide, and sulfur dioxide emissions would be generated but would disperse fairly quickly from the construction area. This degradation would last only as long as construction activities occurred and would most likely have a negligible effect on regional pollutant levels. Fugitive dust from construction could intermittently increase airborne particulate concentrations in the area near the project site, but standard mitigating measures, such as wetting the disturbed soil, would be used to reduce potential adverse effects to a negligible level. One or more of the alternatives could result in a slight increase in visitation, with a

corresponding increase in vehicle emissions. The adverse impacts of this would be reduced as national vehicle emission and fuel-economy standards are revised.

As mentioned above, the single main source of pollution in the greater District of Columbia metropolitan area is vehicle exhaust. The percentage of total vehicles in the metropolitan area that are directly related to visiting the National Mall is quite small during most of the year (non-summer months).

Alternative B proposes adding underground vehicle parking garages. An increase in vehicles and their emissions in the core of the planning area would have adverse impacts on air quality. However, even if 1,000 parking spaces were added, this would be less than a 1% increase in total spaces in the vicinity of the Mall (currently around 400,000). With mitigating factors such as more efficient vehicle standards, this impact is expected to be minor.

One of the goals of the preferred alternative and alternative C is to reduce the park's current output of greenhouse gases by 18% by 2012, which would be a long-term beneficial effect.

These actions would result in short- and long-term, negligible, adverse impacts on local air quality. Because no moderate or major impacts are anticipated from any of the potential actions in this plan, the topic of air quality has been dismissed from further analysis.

### *Wetlands*

Most of the area now in the southern and western portions of the National Mall was a low-lying swampy wetland in the late 1800s. The swamp was later drained and/or filled in to create the landscape seen today. Photographs and maps from the 1870s through the early 1900s show the small Babcock Lake near the original Tiber Creek, and a carp pond near the Washington Monument (Milner Associates 2003). These were filled in by 1923.

Currently, wetlands are present in or along the Tidal Basin, the Washington Channel, and Potomac River. The National Wetlands Inventory categorizes the Tidal Basin as a lacustrine unvegetated wetland. The National

Wetlands Inventory also categorizes the Constitution Gardens Lake as a freshwater pond/palustrine wetland (USFWS 1998).

Wetland habitat supports terrestrial and aquatic invertebrates, fish, waterfowl, reptiles, and amphibians. Uncontrolled growth of blue-green algae and some filamentous algae can reduce the ability of water to support fish.

Federal and state partners of the Chesapeake Bay Program have adopted an interim goal of no overall net loss of the drainage basin's remaining wetlands and a long-term goal of increasing the quality and quantity of the basin's wetlands resource base. Under the preferred alternative and alternative C, naturalized riverbanks would be established in some areas along the Potomac River frontage where existing river walls have deteriorated. These could become small wetland strips along the river. Constitution Gardens Lake would be maintained as a sustainable water body capable of supporting fish. These actions would result in long-term, minor, beneficial impacts to wetlands.

Under alternative B Constitution Gardens Lake would be reconstructed so that it could be drained for use during public events. This would result in the loss of an artificial wetland habitat, a long-term, negligible, adverse impact. Also under alternative B the Capitol Reflecting Pool would be removed, but this feature provides only a very small habitat need for some waterfowl, so the loss would be negligible. There would be no other impacts to wetlands.

Because there would be no moderate or greater impacts, this topic has been dismissed from further analysis.

### *Special Status Species*

Except for occasional transient individuals, no proposed or federally listed endangered or threatened species are known to exist within the planning area (USFWS letter, Sept. 18, 2007).

A federally endangered species, the shortnose sturgeon (*Acipenser brevirostrum*), has recently been found in the Potomac River as far north as Little Falls (USFWS 2009). This large (up to 3 feet) native fish occurs mainly in rivers along the Atlantic coastline from southeastern Canada to

Florida but may venture into saltwater. Short-nose sturgeons reportedly prefer deep pools with mixed or hard substrates and vegetated bottoms, but individuals may vary in preference for various water depths and substrate types. They eat mollusks, crustaceans, worms, and aquatic insects.

The current potential for the sturgeon to spawn within this area is of major interest because of the federally endangered status of the species and the federally mandated responsibility of the National Park Service to protect and enhance endangered species. Principal responsibility for the sturgeon rests with the National Oceanic and Atmospheric Administration's Fisheries Service. The National Park Service is responsible for managing the bed of the Potomac River within the District of Columbia where the shortnose sturgeon could potentially spawn.

The shortnose sturgeon was placed on the original endangered species list on March 11, 1967 (32 FR 4001) due to the damming of rivers and over-harvesting throughout its range. The fish was considered extirpated from the Potomac River but, as a result of the Atlantic Sturgeon Reward Program established in 1996 by the U.S. Fish and Wildlife Service, the first shortnose sturgeon since 1899 was found in the river. To date, 10 shortnose sturgeons have been documented from the Potomac (Minkinen, pers. comm. 2007). Two females were telemetry-tagged, one in 2005 and another in 2006, in an effort to study their movements. Study results were included in an annual report dated March 21, 2007.

It is unlikely that shortnose sturgeon would be present in the Tidal Basin because of warm water temperatures and their preference for using deep channels and a variety of mixed or hard (non-mud) foraging substrates. However, there is always the possibility that an individual could wander into the basin. Therefore, any planned modifications to the substrate in the basin should follow NEPA compliance procedures and address the possibility of adverse impact on this endangered species. While Washington, D.C., maintains water control into the basin, the National Park Service should exercise vigilance for any actions that could degrade water quality.

Under the action alternatives the subsiding Tidal Basin seawalls would be rebuilt, and under the preferred alternative and alternatives B and C the walkways atop the walls would be widened. Widening the walkways could require moving the basin walls into the basin, resulting in the loss of about 5 acres of warm, shallow water habitat. However, since the Tidal Basin is artificial, the long-term impacts of this would be adverse but negligible. Construction would result in short-term, negligible, adverse impacts because of habitat disturbance and sedimentation. Since it is unlikely that the shortnose sturgeon inhabits the basin, construction-related impacts would be unlikely to adversely affect this species. Other actions would have no effect on listed species or their habitat because they are not known to inhabit the planning area.

Species identified by the D.C. Department of the Environment as those in greatest need of conservation are listed in Table 2.

Bald eagles have been observed using the project area. Many black-crowned night herons are seen in the park, including Constitution Gardens Lake. Scarlet tanagers and wood thrushes have been seen in the vicinity of the National Mall. Both birds are migratory and have been recorded as breeding in the area (DC 2007). No nesting sites for either species are known within the study area.

Under the preferred alternative and alternative C portions of the wall along the Potomac River would be removed and replaced with native materials to create more natural riparian areas. This would result in a long-term, negligible, beneficial impact for special status species with riparian habitat needs, such as the D.C. listed black-crowned night heron.

Implementing the no-action alternative would have no effect on special status species. The

**TABLE 2: SPECIES OF GREATEST CONSERVATION NEED, WASHINGTON, D.C.**

Common Name	Scientific Name
Bald eagle	<i>Haliaeetus leucocephalus</i>
Black-crowned night heron	<i>Nictocorax nictocorax</i>
Scarlet tanager	<i>Prianga olivacea</i>
Wood thrush	<i>Hylocichla mustelina</i>

SOURCE: D.C. Department of the Environment, electronic letter, August 27, 2007.

action alternatives could affect, but would be unlikely to adversely affect, the federally listed shortnose sturgeon. They would result in negligible beneficial impacts to the D.C. listed black-crowned night heron. Because there would be no moderate or greater impacts and no adverse effects to special status species, this topic has been dismissed from further analysis.

### ***Soundscape Management***

In accordance with NPS *Management Policies 2006* and *Director's Order #47, Sound Preservation and Noise Management*, an important part of the National Park Service mission is the preservation of natural soundscapes associated with national park system units. Natural soundscapes exist in the absence of human-caused sound.

The natural ambient soundscape is the aggregate of all the natural sounds that occur in park units, together with the physical capacity for transmitting natural sounds. Natural sounds occur within and beyond the range of sounds that humans can perceive and can be transmitted through air, water, or solid materials. The frequencies, magnitudes, and durations of human-caused sound considered acceptable varies among national park system units, as well as potentially throughout each park unit, being generally greater in developed areas and less in undeveloped areas.

The National Mall is in a highly urbanized area, where the protection of a natural ambient soundscape and/or opportunities for visitors to experience natural sound environments is not an objective of the park. Visitors would not come to the park to seek the quiet, intermittent sounds of nature.

Any construction associated with the implementation of the selected alternative, e.g., the hauling of material or the operation of construction equipment, could result in dissonant sounds, but such sounds would be temporary and not out-of-place in an urban setting. Because protection of a natural ambient soundscape and/or opportunities for visitors to experience natural sound environments is not an objective of the park, soundscape management was dismissed as an impact topic.

### ***Lightscape Management***

In accordance with NPS *Management Policies 2006*, the National Park Service strives to preserve natural ambient landscapes, which are natural resources and values that exist in the absence of human-caused light.

Due to its highly urbanized setting, the preservation of natural ambient landscapes is not an objective at the National Mall. The night sky in Washington, D.C., is dominated by lighting of five symbolic icons — the U.S. Capitol, the White House, the Washington Monument, the Lincoln Memorial, and the Thomas Jefferson Memorial. Other public and private buildings, memorials, public art, streets and walks, and park areas are lit to varying degrees.

Under the action alternatives the National Park Service would work closely with the Commission of Fine Arts, the National Capital Planning Commission, the Architect of the Capitol, the Smithsonian Institution, and D.C. city agencies to reestablish the lighting task force to develop an approved, written comprehensive lighting guideline for the monumental core that would address protection to maintain dominant lighting of the five symbolic icons, desired lighting character for urban and park areas, appropriate light levels and color for different areas, and light pollution / protection of night sky from excessive, horizontal light pollution. Any impacts of a lighting guideline would be beneficial, and lightscape management was dismissed as an impact topic.

### ***Agricultural Lands, Prime and Unique Farmlands***

No soils known in the planning area are regulated under the Federal Farmland Protection Policy Act. Additionally, no soils are identified as prime farmland, unique farmland, farmland of statewide importance, or hydric soils by the Natural Resource Conservation Service. None of the alternatives would affect agricultural lands or prime and unique farmlands as defined by the Natural Resource Conservation Service, so these resources are dismissed as an impact topic.

### **Energy Requirements and Conservation Potential**

Implementing any of the action alternatives would result in new facilities requiring energy use. The National Park Service has adopted the concept of sustainable design as a guiding principle of facility planning and development (NPS *Management Policies 2006*, sec. 9.1.1.6). The objectives of sustainability are to design facilities to minimize adverse effects on natural and cultural values, to reflect their environmental setting, and to require the least amount of nonrenewable fuels or energy. All NPS facility development must include improvements in energy efficiency and reduction in greenhouse gas emissions. In all the action alternatives new and reused facilities would be designed with long-term sustainability in mind.

Action alternatives could result in a changed energy need, but this change is expected to be negligible when seen in a regional context. Thus, this topic is being dismissed from further analysis.

### **Climate Change**

Related to the energy use discussion is climate change, the human-caused change to global climate patterns. Climate change is perhaps the most far-reaching and irreversible threat the national park system has ever faced (NPCA 2007). Climate change in this context refers to a suite of changes occurring in Earth's atmospheric, hydrologic, and oceanic systems. These changes, including increased global air and ocean temperatures, widespread melting of snow and ice, and rising average sea level, provide unequivocal evidence that the climate system is warming. While the warming trend, commonly referred to as global warming, is discernible over the entire past century and a half, recent decades have exhibited an accelerated warming rate, with 11 of the last 12 years ranking among the 12 warmest years on record.

While climate change is a global phenomenon, it manifests itself differently in different places. One of the most dramatic effects is the impact on sea level. A rise in sea level could affect natural and cultural resources, and it would likely interfere with public use and enjoyment of parks in low-lying coastal areas. Although many places

in the world have already observed and recorded changes that can be attributed to climate change, the impacts on the National Mall have not been specifically determined. Climate change is a long-term phenomenon, and the likelihood that significant effects will be seen during the life of this plan (50 years) is fairly certain. Some models predict a sea level rise of 15 to 37 inches in the Chesapeake Bay region.

Climate change and the response of governmental agencies is guided by the following regulations and policies:

- *Executive Order 13423* (issued January 24, 2007) requires federal agencies to “conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically, and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.” It includes requirements for the reduction of greenhouse gases and implementation of other energy and water conservation measures. The order requires agencies to reduce greenhouse gas emissions by 3% annually through the end of fiscal year 2015, or 30% by the end of fiscal year 2015, relative to the baseline of the agency's energy use in fiscal year 2003.
- *DOI Secretarial Order 3226* (issued January 19, 2001) ensures that climate change impacts are taken into account in connection with departmental planning and decision making.
- The *NPS Management Policies 2006* state that “the Service will use all available authorities to protect park resources and values from potentially harmful activities. . . . NPS managers must always seek ways to avoid, or minimize to the greatest degree possible, adverse impacts on park resources and values” (NPS 2006e, sec. 4.7.2).

The policies also discuss sustainable energy design, requiring any facility development to include improvements in energy efficiency and reduction in greenhouse gas emissions for both the building envelope and the mechanical systems that support the facility (NPS 2006e, sec. 9.1.1.6). Additionally, projects that include major visitor

services facilities must incorporate LEED standards to achieve a silver rating.

The National Park Service will interpret for the public the overall resource protection benefits from the efficient use of energy, and to actively educate and motivate park personnel and visitors to use sustainable practices in conserving energy (NPS 2006e, sec. 9.1.7).

Implementing any of the alternatives described in this plan would have very little effect on the cumulative level of greenhouse gas emissions or other climate change factors (e.g., the carbon footprint) in the District of Columbia. However, the National Park Service is considering several management directions to reduce the park's contribution to climate change factors. Examples include replacing the current fleet of vehicles and motorized equipment with more fuel-efficient or alternate fuel models, adding insulation and weather-proofing to existing buildings, and using solar panels to generate electricity. New construction, such as restrooms and food service buildings under the preferred alternative, would be constructed to be energy efficient and sustainable. As part of an NPS initiative, the public would receive educational messages about reducing our impact on the climate. These programs and others would be implemented under all alternatives and would contribute to national and international efforts to decrease the effects of human-caused climate change.

Over the life of this plan, it is anticipated that national emission-reduction efforts and new technologies will become available that would decrease the overall output of greenhouse gases and other pollutants from motor vehicles.

Implementation of the preferred alternative could slightly increase total visitation to the park. If all of these visitors arrived by private vehicle, this would result in a corresponding increase in vehicle emissions. Therefore, the consequences of implementing this plan would be long-term, negligible, and adverse to climate change. Because there would be no impacts that would be moderate or higher in intensity, this topic is dismissed from further consideration.

### **Natural or Depletable Resource Requirements and Conservation Potential**

Consideration of these topics is required by the Council on Environmental Quality's NEPA regulations (40 CFR 1502.16). The National Park Service has adopted the concept of sustainable design as a guiding principle of facility planning and development (NPS 2006e, sec. 9.1.1.6). The objectives of sustainability are to design facilities to minimize adverse effects on natural and cultural values; to reflect their environmental setting and to maintain and encourage biodiversity; to operate and maintain facilities to promote their sustainability; and to illustrate and promote conservation principles and practices through sustainable design and ecologically sensitive use. Essentially, sustainability is the concept of living within the environment with the least impact on the environment.

The planning area is an urban setting. Through sustainable design concepts and other resource management principles, no alternative analyzed in this document would result in an appreciable loss of natural or depletable resources. Thus, this topic is dismissed from further analysis.

### **Visitor Experience: Commercially Provided Opportunities**

None of the alternatives would change the ability of commercial providers, sightseeing buses, or commercial guides to offer tours or guided walks on the National Mall. Financial transactions would continue to be made off park land. Therefore, impacts on commercially provided opportunities have been dismissed from further analysis.

### **Park Operations**

#### **Operational Partnerships**

The National Park Service has a number of partnerships related to bookstores, program activities, specific memorials, fundraising, law enforcement, recreation, and national celebrations or televised concerts. The Park Service maintains recreation fields that are permitted through the D.C. Department of Parks and Recreation. These partnerships would not change as a result of adopting a National Mall management plan. Under every alternative partnerships would continue, and agreements would

be updated as needed. Therefore, this topic is dismissed from further analysis.

#### *Shared Infrastructure and Jurisdiction*

There are areas of shared infrastructure such as city-provided utilities (power, water, sewer), GSA steamlines, or issues related to overlapping jurisdiction (roads, signs, and traffic signals). Any future actions on the part of others would undergo collaborative planning, reviews, and approvals to ensure the actions were beneficial to all parties. Park interests in sustainability and efficient park operations would be included in the collaborative process. As a result, any infrastructure upgrades or jurisdictional revisions would be common to every alternative, resulting in no change as a result of the plan. Therefore, the topic was dismissed from further analysis.

#### *Perimeter Security*

Common to every alternative would be the installation of authorized and funded perimeter security for the Thomas Jefferson Memorial and the Martin Luther King, Jr. Memorial, as well as the adjacent Smithsonian Institution museums, the National Gallery of Art, and federal buildings such as the Department of Agriculture. Any perimeter security improvements would undergo review by the National Capital Planning Commission and Commission of Fine Arts. The Washington Monument temporary security screening will be removed and replaced by an approved replacement screening approach. A goal of all security is to minimize the visual impact of security elements and disguise them so they do not detract from the open character that defines the desired experience. There would be no change as a result of the plan; therefore, this topic was dismissed from further analysis.

#### **Environmental Justice**

Executive Order 12898 requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities.

The Washington, D.C., metropolitan area contains both minority and low-income populations; however, environmental justice is dismissed as an impact topic for the following reasons:

- The park staff and planning team actively solicited public participation as part of the planning process and gave equal consideration to all input from persons regardless of age, race, income status, or other socioeconomic or demographic factors.
- Implementation of any alternative would not result in any identifiable adverse human health effects. Therefore, there would be no direct or indirect adverse effects on any minority or low-income population.
- The impacts associated with implementation of any of the alternatives would not disproportionately affect any minority or low-income population or community.
- Implementation of any of the alternatives would not result in any identified effects that would be specific to any minority or low-income community.
- The impacts to the socioeconomic environment resulting from implementation of any of the action alternatives would be predominantly beneficial. In addition, the park staff and planning team do not anticipate the impacts on the socioeconomic environment to appreciably alter the physical and social structure of nearby communities.



# INTERRELATIONSHIPS WITH OTHER PLANS AND PROJECTS

Planning by the National Park Service for the National Mall takes place within an urban framework of roads, buildings, and open space (see Urban Design Framework map). Washington, D.C., is an outgrowth of the L'Enfant and McMillan plans, and early in the 20th century Congress created the United States Commission of Fine Arts and the National Capital Planning Commission to protect the visions of these visionary plans. Since 1933 the National Park Service has been responsible for managing federal park lands in Washington, D.C.

Planning for the National Mall is integrally tied to other comprehensive or cooperative planning efforts in the District of Columbia. These inter-related efforts are summarized below, and specific plans and projects are also considered in the cumulative impacts analysis in the “Environmental Consequences” portion of this document.

Planning and compliance for the Vietnam Veterans Memorial Center, the Dr. Martin Luther King, Jr. Memorial, and the National Museum of African American History and Culture is ongoing by each sponsor. The National Park Service is assisting in the planning and compliance efforts for each of these projects, and opportunities for public involvement are being provided through the NEPA and NHPA compliance processes.

## ARCHITECT OF THE CAPITOL

---

The Architect of the Capitol's *Capitol Complex Master Plan* is an update of the 1981 *U.S. Capitol Master Plan*, which aligned with the 1970s NPS plans for the Mall. The revised plan addresses areas east of the National Mall, including the Capitol, the U.S. Supreme Court, the U.S. Botanic Garden, and the Library of Congress. The plan is a long-range vision, master plan, and implementation strategy for the maintenance, renovation, and improvement of the Capitol complex over the next 20 years. The planning principles address stewardship, urban form and

context, and workplace and visitor needs and issues.

Planning for the design of Union Square would be coordinated with the Architect of the Capitol and could also consider design implications related to the U.S. Senate Youth Park and U.S. Botanic Garden Education and Outreach Center to the north, as well as the parking function within the rights-of-way of Maryland and Pennsylvania avenues between 1st and 3rd streets.

## NATIONAL CAPITAL PLANNING COMMISSION

---

In the 1920s the National Capital Park and Planning Commission (renamed the National Capital Planning Commission in 1952) hired Frederick Law Olmsted Jr., an original member of the McMillan Commission, to prepare plans to implement the McMillan plan. Some of his resulting plans addressed the entire area, such as an illustrative master plan from 1939 that delineated a somewhat simplified vision of the McMillan plan. The Olmsted Jr. plans were implemented in Union Square and the Mall. His work at Union Square was changed by the 1970s “Washington Mall Plan” (Skidmore, Owings and Merrill 1973), but his design on the Mall retains great integrity.

In 1997 the National Capital Planning Commission (NCPC) prepared *Extending the Legacy*, which laid the groundwork for Congress to amend the Commemorative Works Act in 2003 to strengthen and clarify the act's purpose and to designate the Reserve area. The *Legacy* plan provides an overarching vision for the nation's capital that builds on the principles of the L'Enfant and McMillan plans and is their successor. It calls for re-centering the city on the U.S. Capitol by mixing public and private uses and extending new public buildings, memorials, and museums into all quadrants of the city.

The 2001 *Memorials and Museums Master Plan* identifies more than 100 sites in Washington, D.C., for future commemorative works and cul-

tural attractions, recognizing that the Reserve does not contain sufficient space to keep pace with our nation's evolving history and the need to commemorate its culture, heroes, and history in the future. Five of these sites have been selected for new memorials, including the U.S. Air Force Memorial and the Dwight D. Eisenhower Memorial.

The *Comprehensive Plan for the National Capital: Federal Elements* created a planning framework connected by the following goals: (1) accommodate federal and national activities, (2) reinforce smart growth, (3) support coordination with local and regional governments, (4) preservation and historic features, and (5) the federal environment (NCPC 2004a). Visitor elements, transportation, and open space goals are compatible with the National Mall plan.

The *Comprehensive Plan* also called for an updated master plan for the National Mall. This *Draft Plan / Environmental Impact Statement* presents the National Park Service's vision for the National Mall, something that has been

missing. It also includes additional topics not covered in a master plan as defined by the National Capital Planning Commission.

The *Monumental Core Framework Plan: Connecting New Destinations with the National Mall* is a joint effort of the National Capital Planning Commission and the U.S. Commission of Fine Arts (NCPC 2009). It advances the vision articulated in the *Legacy* plan by focusing on the areas immediately adjacent to the National Mall. Through more detailed planning, it identifies opportunities to transform the architectural monumentality of the core to more contextual place-making. The *Framework Plan* lays out a series of proposals to integrate the civic qualities of the National Mall with the vitality of the city to create new destinations that will be prestigious locations for future cultural attractions, distinguished settings for government offices, and inviting places to enrich the experience of people who live, work, or visit here.

Related to access and circulation, a long-term vision in the *Framework Plan* is to (1) relocate,

---

## Monumental Core Framework Plan Opportunities

---

consolidate, and relocate the I-395/14th Street bridges (the George Mason, Rochambeau, Arland D. Williams Jr., Metro, and railroad bridges) to the south to create additional gathering space southeast of the Thomas Jefferson Memorial, (2) develop a new Metro station near the Thomas Jefferson Memorial, (3) provide new Metro station entries at 7th Street and Constitution Avenue NW, (4) add midblock crossings on Constitution Avenue, and (5) redesign roads north of Constitution Avenue and west of 23rd Street NW to improve pedestrian access and connections to neighborhoods and the Kennedy Center. The *Framework Plan* focuses on this area and recommends minimizing above-grade infrastructure and establishing: (1) a symbolic, visual, and physical connection between the Kennedy Center and the Lincoln Memorial; (2) commemorative and recreation space and improved pedestrian and bicyclist paths along the waterfront; and (3) an extension of Constitution Avenue to the historic belvedere. The National Park Service supports this vision.

On April 2, 2009, the *Framework Plan* was approved (NCPC 2009). The National Mall planning effort has been coordinated with the development of the *Framework Plan*.

## **DISTRICT OF COLUMBIA**

The District of Columbia's *City Center Action Agenda 2008* identifies challenges and actions needed to ensure the vitality and vibrancy of central Washington. It recognizes the great opportunity to develop well-connected and distinct areas in a rapidly expanding downtown area that now has the National Mall as its centerpiece. The plan advances Washington's identity as a waterfront city, and it recommends investment in key places, corridors, and transit to ensure economic vitality, sustainability, and cultural diversity (District of Columbia 2008). The plan identified 4th, 7th, and 14th streets as priority corridors for crossing the Mall; 10th Street would be restored north of the National History Museum. Additionally, the NCPC *Framework Plan* proposes pedestrian improvements along 12th, 14th, 15th, and 17th streets, as well as west of 17th Street.

## **SMITHSONIAN INSTITUTION**

The Smithsonian Institution's Arts and Industries Building, which is just south of the Mall, has been suggested as a visitor or welcome center for the National Mall. The building is outside the Reserve, where visitor centers are prohibited. The Smithsonian Institution has stated that they believe visitors could be well served by coordinated and combined information. The building has large open exhibit halls, natural daylight, and is close to two subway stops. The Smithsonian Institution has begun repair and preservation work at the Arts and Industries Building, which has been funded by the American Recovery and Reinvestment Act of 2009. The ultimate use and treatment of the building is yet to be determined.

On May 8, 2008, the National Museum of American Latino Community Commission Act was signed into law (Public Law 110-229). The Hispanic caucus has asked that no permanent decision on the Arts and Industries Building be made until the commission has assessed it as a possible location for a new National Museum of the American Latino.

Under all alternatives the National Park Service will track progress on the future of this historic building and provide comment as needed. Any proposals affecting the National Park Service will be fully analyzed to determine their value, financial implications, and operational impacts.

## **NPS PLANNING EFFORTS**

### **Visitor Transportation Study**

The National Park Service prepared an *Environmental Assessment for a Visitor Transportation Study for the National Mall and Surrounding Park Areas* in 2006. The study recommends a convenient visitor transportation service that will help protect park resources and ensure high-quality visitor experiences by offering a sustainable, educational, integrated, and affordable transportation network for park visitors (NPS 2006c). The service will replace the existing educational hop-on / -off service known as Tourmobile. The plan proposes an integrated, easy-to-use system with basic orientation and a choice of additional educational / interpretive services.

## **Urban Design Framework**

---

11x17

This page has been left blank intentionally.

The proposed service includes:

- a two-way National Mall route and an additional one-way loop linking the memorial core area to downtown
- a one-way loop serving Arlington Cemetery, with extensions to the U.S. Marine Corps (Iwo Jima) Memorial; future extensions are also proposed to the U.S. Air Force Memorial and the September 11th Memorial

These proposals could be compatible with existing transit, such as the Metrobus Circulator.

Free parking provided by the National Park Service in the vicinity of the National Mall would be changed to metered parking, and routes would be designated for the recreational use of Segway® HTs and electric scooters.

All visitor transportation service should be more frequent and at a lower cost. Additional convenient stops will be provided at Metro stations. All alternatives in this document are consistent with the proposed transportation service.

## The White House and President's Park

The goal of the *Comprehensive Design Plan for the White House and President's Park* (NPS 2000a) is to improve the efficient functioning of the Office of the President, to preserve and enhance the symbolic and historic character of the site, and to improve the experience of the American public and all visitors who come to the house, the grounds, and the surrounding President's Park. The plan emphasizes a pedestrian-oriented experience within President's Park, and the White House Visitor Center in the Commerce Building would be expanded. Any actions taken under a National Mall plan would complement the *Comprehensive Design Plan for the White House and President's Park*.

The *Design Guidelines for the White House and President's Park* (NPS 1997) provide a framework of mutually agreed upon tenets that guide, but do not dictate, future designs. The White House and President's Park will continue to exhibit a sense of unity and to be an integral element of the urban fabric, with a direct connection to the District of Columbia, the monumental core, and the National Mall.

## Center for Urban Ecology

The National Park Service's Center for Urban Ecology provides scientific guidance, technical assistance, and education for the preservation, conservation, and enhancement of park resources within urban landscapes. The center is committed to improving and conserving the quality of natural resources throughout the National Capital Region of the National Park Service. Working with resource managers, researchers, and the public, the center strives to discover and incorporate new ways to understand, preserve, and enhance natural communities within and around the national parks in the Washington, D.C., area. The center's research and initiatives continue to provide planning guidance on issues affecting the National Mall plan.

The center can undertake inventories, conduct monitoring, and prepare reports related to air and climate, geology and soils, water resources, biological integrity, and landscape dynamics. In the past they were involved in several studies of soils that addressed compaction. The booklet *Values and Challenges in Urban Ecology* (NPS 2008f) identifies several challenges in urban park areas, including impervious surfaces and trees.

## INTERAGENCY PLANNING EFFORTS

### CapitalSpace

Washington, D.C., has more than 7,650 acres of public parks, ranging from Rock Creek Park to small neighborhood parks, playgrounds and ballfields. The National Capital Planning Commission, the National Park Service, and the District of Columbia have formed CapitalSpace to enhance existing plans for D.C. parks by providing closer coordination of separate initiatives (NCPC et al. 2008). The goal is to develop a citywide framework to achieve the full potential of a beautiful, high-quality, and unified park system for the nation's capital. As such, the National Mall and all of the areas managed by the National Mall and Memorial Parks play an important role in providing for active and passive recreation. The CapitalSpace initiative includes maps that provide a comprehensive analysis of access to various existing park resources, including active recreation fields, natural resources, and passive recreation amenities.

CapitalSpace envisions a beautiful, high-quality, unified park system for the nation's capital that

- is safe and accessible to everyone who lives in, works in, or visits the city
- includes a variety of parks and open spaces that connect communities
- incorporates stewardship and celebration of natural, cultural, commemorative and historic spaces
- provides a diversity of active and passive recreation
- contributes to a healthy, sustainable, and livable city
- serves as a national and international model of citizen engagement and collaboration

## Planning Together for Central Washington

*Planning Together for Central Washington* is a collaborative effort of the Architect of the Capitol, the Commission of Fine Arts, the District of Columbia, the National Capital Planning Commission, and the National Park Service. Each of these agencies is undertaking major planning initiatives for central Washington, which provides a framework to coordinate planning and investment to ensure that central Washington continues to serve as a model for the nation and the world through its cultural venues, its architecture and open spaces, its vibrant walkable neighborhoods and public transit, and the national and international presence. While each initiative reflects the mission and goals of its sponsoring agency, the plans share core objectives and implementation priorities.

Common objectives that the agencies have adopted include the following:

- *Welcoming Atmosphere* — Create an atmosphere that embraces local citizens and visitors, statesmen, foreign dignitaries, and the global media. Celebrate the warmth of a friendly town, the dignity of a seat of government, and the vibrancy of a progressive international city. Provide opportunities for the exchange of ideas, citizen action, enjoyment, and meaningful encounters and

events. Create public spaces that are attractive year-round as well as programs and services that are accessible and easy to use.

- *Well-Connected Public Space* — Create a distinguished and accessible public realm of enduring quality shaped by beautiful civic infrastructure, architecture, streets, parks, and waterfronts. Connect destinations and overcome existing physical barriers with walkable landscaped corridors, interpretive and wayfinding systems, and engaging views. Meet the highest standards for design, construction, and maintenance.
- *Distinctive Places* — Create or renew neighborhoods and public places throughout central Washington to provide a mix of uses and experiences that are authentic, diverse, and reflect the city's history and culture. Devote attention and infrastructure reinvestment to ensure that the National Mall remains a destination worthy of its civic, historic, and symbolic role in serving the city and the nation. Refurbish historic government facilities and sites that serve the American people and house the three branches of government.
- *Green and Sustainable* — Achieve a livable, healthy, and sustainable environment with clean air, water, and soil by using model development and maintenance practices. Apply an integrated ecological approach to implement programs that control emissions, plant trees, preserve and connect open spaces, encourage green and sustainable building practices, reduce pollutants, conserve energy, and reuse and recycle water and materials.
- *21st Century Transportation* — Establish a comprehensive, flexible, convenient, and coordinated network of public and visitor transit options — subway, light rail, streetcar, bus, water taxi — linking central Washington destinations to support economic investment and environmental health. Upgrade public infrastructure to encourage walking and bicycling, and develop comprehensive travel demand management programs to reduce congestion, improve air quality, and address parking and tour bus issues.