



**UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE**

RECORD OF DECISION

**NATIONAL MALL PLAN /
ENVIRONMENTAL IMPACT STATEMENT**

National Mall, Washington, D.C.

Recommended: *Marie Burns*
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11/8/2010
Date

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11/9/2010
Date

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11-9-2010
Date

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11/9/2010
Date

RECORD OF DECISION

The Department of the Interior, National Park Service (NPS), has prepared this *Record of Decision* (ROD) for the *Final National Mall Plan / Environmental Impact Statement (Final Plan/EIS)* pursuant to the National Environmental Policy Act (NEPA and its regulations at 40CFR Parts 1500- 1508. The ROD contains a summary of the selected alternative, which is the basis for the plan, along with mitigation measures developed to minimize environmental harm; other alternatives considered; the basis for the decision in terms of planning objectives and the criteria used to develop the preferred alternative; the finding of no impairment of park resources and values; the environmentally preferable alternative; and the public and agency involvement. The plan will serve as the foundation for subsequent implementation.

BACKGROUND

The National Mall in Washington, D.C., is managed by the NPS as part of the national park system. Following direction by Congress, in November 2006 the NPS announced an intensive planning effort to refurbish the National Mall so that (1) its treasured memorials and historic landscapes could be preserved, (2) very high levels of use could be sustained, and (3) the needs of visitors could be met. This effort recognized that the National Mall was not designed for the types and levels of use it currently receives — nearly 25 million visits annually, including demonstrations, national celebrations, and permitted events. This high level of visitation has resulted in adverse impacts on the cultural and natural resources of the National Mall. Adequate facilities are lacking for large gatherings, events, exhibitions, and celebrations; for tourism and general visitation; for group visitation; for visitors with disabilities; and for recreational opportunities. This has had adverse impacts on visitor experiences and park operations.

The scope of the *Final Plan/EIS* encompasses three specific locations collectively referred to as the National Mall, in Washington, D.C.:

- 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, including the Lincoln Memorial, the World War II Memorial, the Vietnam Veteran's Memorial, the Franklin Delano Roosevelt Memorial, the Tidal Basin, and the Thomas Jefferson Memorial

In recent years various plans, studies, and NEPA analyses have been conducted for projects at these locations within the National Mall. In some instances this has resulted in work that is underway or has been recently finished. These projects were necessarily considered as part of the *Final Plan/EIS* process and at the same time they also benefited from the information developed in this major planning process. The status of some of these projects is also included in this ROD.

Planning started with an NPS- hosted national symposium on future use and management of the National Mall and featured nationally recognized experts in architecture, freedom of speech, First Amendment rights, landscape architecture, history, law enforcement, planning, and government. Before the symposium NPS commissioned or produced a series of reports including the legal considerations of the National Mall's essential role in First Amendment rights and demonstrations, the development of the National Mall, and an analysis of best practices used at comparable sites around the world. Substantial public involvement was integral to the process for developing the plan and resulted in more than 30,000 public comments, as well as close collaboration with 21 governmental agencies and 30 organizations with an interest in the National Mall and/or historic preservation.

The *Draft Plan/EIS* was released on December 18, 2009, for a 90- day public review. Substantive comments on that document were responded to in the *Final Plan/EIS*, which was released for a 30- day no- action period on July 13, 2010. Three letters commenting on the *Final Plan/EIS* were received during this no- action period, and these comments were considered along with other information as part of the foundation for this ROD. These letters and the NPS responses are available for review at the National Mall and Memorial Parks headquarters.

DECISION

The NPS has selected for implementation the preferred alternative evaluated in the *Final Plan/EIS*. Under this alternative the National Mall will be rehabilitated and refurbished so that very high levels of use can be perpetuated and the needs of all visitors and users can be met in an attractive, high- quality, energy- efficient, and sustainable manner. This alternative combines ideas from all of the other alternatives considered. All practical means to avoid or minimize environmental harm from the selected alternative have been adopted. After a review of the environmental consequences of the selected action, the implementation of the plan will not impair park resources or values and will not violate the NPS Organic Act.

SELECTED ACTION

Key Proposed Actions

General National Mall Actions

The selected action recognizes the multiple roles of the National Mall as the nation's preeminent civic stage and symbolic front yard, with its layers of meaning, history, and commemoration, as well as its various uses including recreation. It also recognizes that the National Mall will continue to evolve as the nation's premier civic, symbolic, historic, and commemorative space, and that it is comprised of natural, cultural, and historic resources.

The NPS proposed course of action is to reinforce the overall identity of the National Mall and to establish a sense of place through enduring and compatible high- quality design, as well as through the highest standards of facility maintenance. The National Mall will be respectfully rehabilitated and refurbished, with improvements made to the pedestrian environment, so that very high levels of use can be accommodated and so that the needs of all visitors can be met in an attractive, high- quality, energy- efficient, and sustainable manner. As the preeminent civic stage for our country, First Amendment demonstrations, commemorations, national ceremonies, and celebrations will be better accommodated. Memorials and landscapes will be protected, and the large areas of open space that are defining features of the designed historic landscape will be better maintained. The landscape will evolve to accommodate contemporary uses while respecting the planned historic character and visions of the L'Enfant and McMillan plans. The National Mall will be emphasized as a year- round destination where the beauty and variety of every season will enhance visitor experiences. Diverse opportunities will be available for visitors and will include educational, cultural, and musical programs, as well as active and passive recreational activities. The NPS will continue to manage the National Mall pursuant to the applicable laws, regulations, and policies for these natural, cultural, and historic resources. Actions that are continuations of existing actions and common to all alternatives are not listed. Aspects of the plan are described in the ROD sections on minimizing harm and the basis of the decision. Highlighted here are key proposed actions designed to address opportunities, problems, and concerns:

- ***Cultural Resources*** — The health and appearance of the historic landscape and all associated memorials, buildings, and architectural features will be improved. Planned vistas and the large open spaces that define the historic landscape will be protected and preserved.
- ***Natural Resources*** — The NPS will create a more sustainable environment. There will be a greater emphasis on science- based decision making. Water quality problems will be addressed in

water features. The NPS will develop means to conserve water, reduce the use of potable water, and reuse water. Conditions will be improved for tree and turf areas, and soil conditions will be enhanced or reengineered to reduce or reverse the effects of compaction.

The NPS recognizes the potential impact of climate change on the natural and cultural resources of the National Mall, especially due to its location at the Potomac River on the tidal portion of the Chesapeake Bay and potential changes due to storm severity, drought, and temperature changes. As specific projects and programs are developed, the best scientific information available from downscaling scenarios and from planned increased adaptive management based on monitoring will be used.

- ***The Civic Stage*** — Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated, generally on a first- come, first- served basis. National celebrations will remain a priority. Special events will also be accommodated, consistent with federal regulations. The permitting system will be updated for special events and First Amendment demonstrations with a computer based system. Monitoring procedures will be enhanced to ensure that resources are better protected and that impacts on soil, turf, and vegetation are reduced.

Paved multipurpose venues will be designed to be flexible and will be integrated into multiple locations with desirable backdrops for large gatherings, events, exhibitions, and celebrations. To better support such events, these venues will be equipped with infrastructure to accommodate spaces planned for stages/tents and activities. Infrastructure improvements could include utility connections; necessary temporary facilities, such as portable toilets, incident command, and EMS facilities to reduce the volume of trailers and trucks onsite; flexible office space to replace temporary trailers; and a mass notification system. A computerized and online permit scheduling system that will make the application process for such events much more user friendly will be developed.

The NPS will add paved spaces to accommodate repeated use by large crowds and event activities. To better protect the historic landscape, improvements to critical venues such as Union Square, the Mall, the Washington Monument grounds, the Lincoln Memorial, Constitution Gardens, and the Tidal Basin will be designed to accommodate high use and to improve circulation and access. There will be multipurpose areas and facilities that can be transformed to meet different levels of use, and more restrooms will be added.

- ***Access and Circulation*** — The NPS will cooperate with the tour bus industry to better coordinate tour bus activity and will continue to work with the DC government and others to address tour bus parking. Tour bus drop- offs will be redesigned to function more effectively.
- ***Visitor Experience*** — The condition and appearance of this symbolic American landscape will be improved. A welcome plaza will be developed at the Metro station at 12th Street and Jefferson Drive SW to help orient visitors to the National Mall. Geographically dispersed, convenient, multipurpose visitor facilities will provide services such as restrooms, water, information, and refreshment. The pedestrian environment will be improved, with better walking surfaces and lighting, places to sit, and improved information signs and wayfinding. Flexible spaces will be designed for cultural activities, programs, and entertainment; additional programs and guided tours, including walking and bicycle tours, will be offered. Areas will be provided for groups to gather for programs, eating, shelter, and other activities without interfering with general visitation.

Accessible and universal designs will be used, and access overall will be improved. There will be central locations for services such as wheelchair or electric scooter rentals, courtesy shuttles, and additional parking for visitors with disabilities. Seating and facilities will be more conveniently dispersed.

Recreational activities and associated facilities will be enhanced. There will be better surfaces for jogging, separate bicycle lanes, bike rentals, and improved conditions for league play and pickup sports such as softball, kickball, and soccer. More boating choices will be offered at the Tidal Basin, with model boating at Constitution Gardens Lake. Conditions will also be enhanced for passive recreation such as picnicking. The economic feasibility, necessity, and appropriateness of changes to commercial visitor services and facilities will be assessed.

- **Park Operations** — Waste management will be made more efficient; recycling at events will be expanded; a visual quality team will continue to be used to improve conditions and the appearance of park facilities; and NPS energy efficiency goals will be satisfied.

Under the plan the NPS will strive to make the National Mall a model for recycling and waste management, and sustainability. The maximum LEED rating possible will be the goal, and recommendations of the Sustainable Sites Initiative™ will be incorporated, and efficient maintenance, including the use of special skills teams to maintain turf, irrigation systems, and water features will be employed. Operational access to all areas will be improved, and monitoring and adaptive management will be used to address problems when they are first identified.

Specific Areas

The Mall

Union Square (1st to 3rd Streets). Union Square will be transformed so that it can be easily adapted for various uses and be more pedestrian friendly. The Ulysses S. Grant Memorial will remain as the focal point of a dignified civic square based on historic precedents, with smaller water features and more paved surfaces so that it can be easily converted into a larger venue for First Amendment demonstrations, national celebrations, and events. The civic space will be designed as a destination with flexible, indoor/outdoor, multipurpose areas where visitors may enjoy views of the nearby Grant Memorial and the U.S. Capitol and where there could be small exhibitions and seating. Shade structures may be provided along with high- capacity restrooms, which will be designed so that more stalls can be opened during high- use periods. Refreshments and recreation equipment rentals will be available. A smaller reflecting pool, perhaps with interactive water features, could highlight sustainable water management practices and make the space more suited to various uses while reducing water use. It could also be redesigned as a shallow sheet of water that could be played in, drained for demonstrations and events, or frozen for seasonal ice skating.

The Mall (3rd to 14th Streets). To accommodate anticipated use volumes during permitted activities and national celebrations, the NPS proposes additional paving on the Mall, with areas designed specifically for stages, events, and high- use levels. Critical elements of the historic landscape, such as lawns and elm trees, will be improved and protected. Based on public comments, additional scientific study will be undertaken to examine the health of the elm trees and soil conditions on the Mall, and to identify appropriate levels of use so as not to jeopardize the health of the trees. As part of a coordinated paving system for the National Mall, gravel on pathways and former roadbeds (with paving underneath) will be removed and replaced with paving that is more durable and easier to maintain. A paved welcome plaza at 12th Street and Jefferson Drive SW will include a visitor contact station, high-capacity public restrooms, shaded and group seating, orientation maps, and perhaps a large tactile model or pavement map of the National Mall.

Washington Monument and Grounds

The landscape plan for the grounds, which was essentially completed in 2003, will be updated to accommodate ongoing projects and implemented. Hours for visitors to go to the top of the monument will be extended until 10 p.m. during the peak season.

There will be a new indoor/outdoor, multipurpose facility and performance space on the northwest corner of 15th Street and Independence Avenue SW, replacing the Sylvan Theater and consolidating visitor services. There could be information, education, food and retail services, office space, and restrooms sized for high- volume use. Survey Lodge will also be reused for visitor services and parking for visitors with disabilities, information, exhibits, and recreation equipment rentals such as bicycles and kites.

West Potomac Park (North of Independence Avenue)

No major changes are proposed at the World War II Memorial or to the District of Columbia War Memorial other than the restoration and landscaping work that is underway at the latter site.

Constitution Gardens. A new multipurpose visitor facility, with a unique design that reflects an indoor/outdoor garden character, will be added near the east end of the lake, along with a flexible program or performance space. The historic canal Lockkeeper's House may be relocated away from the corner of 17th Street and Constitution Avenue NW to provide better protection for the structure and visitors. Together with the new and existing concession facilities, the Lockkeeper's House may be reused for visitor services, including information, exhibits, a bookstore, retail sales, recreation equipment rentals such as model boats and portable lawn chairs, and space for NPS partner activities.

Vietnam Veterans Memorial. Space for seating and contemplation will be added in the vicinity of the memorial. An underground memorial center has been authorized by Congress to be established by a sponsor organization, and this is under development.

Lincoln Memorial and Grounds. The memorial exhibit area and restrooms, which are on the lower level, will be renovated. The bookstore will be relocated from the chamber level to the lower level. The Reflecting Pool is being rehabilitated along with the related elm walks and access from the pool to the memorial; this work is underway as a separate project. New architecturally compatible restrooms will be added in the vicinity of the south concession refreshment stand.

Korean War Veterans Memorial. The walks on the west side of the Korean War Veterans Memorial will be redesigned to better accommodate changing circulation patterns and group visitation in the area.

Ash Woods. The U.S. Park Police stables will be rebuilt to be compatible with the historic character and architectural quality of structures on the National Mall. New restrooms will be built nearer the stables than the current facility. A small food service facility may be provided if warranted by demand. The condition of the JFK Hockey Fields will be improved and edges softened with additional trees.

West Potomac Park (South of Independence Avenue)

Tidal Basin Area. The seawalls will be rebuilt above tidewater and will be designed based on recommendations of engineering and scientific studies, as well as for climate change factors such as sea level rise, changes in temperatures, and storm patterns. The basin's historic appearance will be retained, but walks and bridges will be widened, and bicycling/vehicular circulation and safety will be improved. As a result the Tidal Basin may be slightly reduced in size. A system of separate bicycle lanes and/or trails will be developed. High- quality paving, additional seating, restrooms, and more pedestrian stopping points will further enhance visitor experiences. Pedestrian lighting will be added in a manner that will not impact the nighttime ambience of memorials. The recreation equipment rental facility and refreshment stand on the northeast side of the basin will be replaced by a new structure in the same general location. The Martin Luther King, Jr. Memorial is under construction along the Tidal Basin by a sponsor organization.

Franklin Delano Roosevelt Memorial. A comprehensive assessment of visitor use patterns will be undertaken. A small food service facility with additional restrooms may be provided nearby if warranted by demand.

West Potomac Park Riverfront. Where feasible, a sustainable, vegetated shoreline will be established along the Potomac River, while in other areas stone- faced seawalls will be used. Design and construction for shoreline treatments will follow best management practices as called for in the Chesapeake Bay Protection Act. Areas may be developed for seating, fishing, and enjoyment of the water's edge, water taxi service, or the launching of small, hand- carried watercraft such as canoes or kayaks. Walks will be improved with separate bike lanes or trails along Ohio Drive and the river walks. The condition of athletic fields will be improved.

George Mason Memorial. The historic fountain that was incorporated into the memorial's design will be rehabilitated to improve water quality, and the perennial gardens will be improved.

Thomas Jefferson Memorial. The former parking area south of the memorial will be redesigned to accommodate demonstrations and special events, and utility connections will be provided to support them. The tour bus drop- off will be redesigned for better pedestrian circulation. New lanes or trails for bicycling and walking will improve safety and access near the memorial and to the I- 395 bridges. The refreshment stand south of the memorial will be replaced and possibly relocated, and restrooms will be added.

Measures to Minimize Environmental Harm

The NPS investigated means to avoid or minimize environmental impacts as a result of the plan and its projects. The NPS had papers, studies, and assessments prepared at the beginning of the planning process, both for public information and as background for the NPS planning team. These papers documented existing conditions on the National Mall and examined best practices used at other comparable sites, including areas receiving high levels of use, areas with permitted activities, and areas with public rights to gather, demonstrate, or protest. This comprehensive background analysis included a review of legal considerations related to public use and the First Amendment on the National Mall, the development of cultural landscape inventories for different areas of the National Mall, and operational assessments during two major events — the Fourth of July celebration and the National Cherry Blossom Festival. The NPS also worked with the U.S. Environmental Protection Agency (EPA) and consultants to learn about best practices for solid waste and recycling programs. The results of this extensive background analysis were incorporated into the alternatives, including the preferred alternative.

The NPS will continue to take all practical measures to avoid environmental harm and harm to related cultural and historic resources through compliance with statutes such as the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA), which provide for analyses and consultation. The NPS will continue to work with the U.S. Army Corps of Engineers on projects related to the Potomac River, the Tidal Basin, and the Potomac Park levee, and as appropriate with other organizations, agencies, and commissions including the Advisory Council on Historic Preservation, the D.C. State Historic Preservation Office, the U.S. Fish and Wildlife Service, the U.S. Commission of Fine Arts, and the National Capital Planning Commission.

In addition to the mitigating measures that are included in the selected action, which is the preferred alternative, the following broad areas of mitigation for cultural resources, natural resources, social monitoring, and adaptive management are also part of the plan.

Cultural Resources

To the greatest extent possible, the NPS will preserve and protect resources that reflect human occupation and historic and legislated use of the National Mall. The NPS has signed an NHPA Section 106 Programmatic Agreement with the Advisory Council on Historic Preservation and the D.C. State Historic Preservation Office to ensure the continued preservation and protection of the cultural resources of the National Mall. The Programmatic Agreement adds requirements to the NHPA Section 106 process for individual projects. Through this agreement the NPS has, among other things, agreed to update its nominations to the National Register of Historic Places, lead an evaluation of historic resources within the monumental core, and assess and consider a national historic landmark nomination. Specifically, the NPS will update the National Mall nomination to ensure that all areas under NPS jurisdiction are included. The updated nomination may provide documentation required to establish a revised historic district. In addition, the NPS will seek to work with federal preservation officers and managers of historic resources on or adjacent to the National Mall that could result in a multiple property nomination for properties within the monumental core. The updated NPS nomination and the multiple property nominations for the monumental core area could provide a foundation for assessing and considering a national landmark nomination or nominations for the monumental core of Washington, D.C.

Specific mitigating measures for cultural resources will include the following:

- Continue to inventory and research archeological, historic, and ethnographic resources, as well as cultural landscapes and historic structures, to better understand and manage the resources. Continue to follow federal laws, regulations, and NPS guidelines in managing cultural resources and collections.
- Avoid adverse impacts by applying the relevant *Secretary of the Interior's Standards*. If adverse impacts are unavoidable, mitigate them through consultation with all interested parties per the NHPA Section 106 Programmatic Agreement and procedures.
- Document historic structures and cultural landscapes to be adaptively reused according to the standards of the Historic American Buildings Survey / Historic American Engineering Record / Historic American Landscape Survey.
- Wherever possible, place pathways and sidewalks, parking areas, and other facilities in previously disturbed areas or in existing developed areas. Design facilities to avoid known or suspected archeological resources.
- Complete project- specific archeological investigations before a final decision on a project location and before finalizing construction designs.
- Conduct archeological site monitoring, data recovery, and documentation during construction if warranted and in consultation with the D.C. State Historic Preservation Office.

Natural Resources

The NPS will preserve and protect, to the greatest extent possible, the natural resources of the National Mall. Mitigating measures intended to reduce or eliminate adverse effects on natural resources may include the following:

- *Air Quality* — Implement a dust abatement program; include standard dust abatement measures such as watering or otherwise stabilizing soil, covering haul trucks, employing speed limits on unpaved roads, minimizing vegetation clearing, and revegetating disturbed areas after construction. Implement sustainable management, planting, and rehabilitation of existing vegetation to increase landscape ecology. Future plans to improve bus access and parking, as well as potentially to provide water taxi access, may reduce auto emissions in the vicinity.

- *Water Resources* — To prevent water pollution during construction, use best management practices such as undertaking erosion control measures and minimizing discharge to water bodies, and regularly inspecting construction equipment for leaks of petroleum and other chemicals. Avoid the use of heavy equipment in waterways. As requested by EPA, educate the public about graywater use at ornamental water features where it is used.

Design and install a runoff filtration system to minimize water pollution from larger parking areas; consider both structural and bioremediation options (fungi, microorganisms, higher plants).

Ensure that the Potomac Park levee, which is currently under design, will meet new and more stringent U.S. Army Corps of Engineers standards. Take into consideration the most current data and scientific models related to climate change in any future projects affecting water resources.

- *Wetlands and Floodplain Management* — Ensure wetlands are delineated by qualified NPS staff or certified wetland specialists. Through NPS and other agency requirements, evaluate specific plans and actions that are within the 100- year floodplain or that might affect wetlands to minimize impacts. Perform construction activities to prevent damage caused by equipment, erosion, siltation, etc. The completed *Statement of Findings for Floodplain Management* pursuant to Executive Order 11988 is attached to this ROD.
- *Soils* — Build new facilities on soil suitable for development. Minimize soil erosion as required by the Chesapeake Bay Protection Act to buffer waterways by limiting the time that soil is left exposed and by applying other erosion control measures, such as erosion matting, silt fencing, and sedimentation basins in construction areas. Revegetate construction areas in a timely period.
- *Vegetation* — Monitor areas used by visitors (such as around trails) for vegetation disturbance. Use public education, revegetation of disturbed areas, erosion control measures, and barriers to control potential impacts on plants from trail erosion and social paths. Ensure that vegetation along the tidal shore conforms to the extent possible with recommendations set by the Chesapeake Bay Protection Act.
- *Wildlife* — Use techniques where necessary to reduce impacts on wildlife, including visitor educational programs, restrictions on visitor activities, and park ranger patrols.

Implement a natural resource protection program that includes construction scheduling, biological monitoring, erosion and sediment control, fencing or other means to protect sensitive resources adjacent to construction sites, removing food- related items and rubbish, salvaging topsoil, and revegetating disturbed areas. This could include construction monitoring by resource specialists, as well as treatment and reporting procedures.

Address the overabundance of native species such as the Canada goose through resource monitoring and specific planning with public input.

Include fish management in the long- term resource management actions for Constitution Gardens Lake.

Continue to ensure that programs and design and construction documents include methods to minimize impacts to migratory birds, and continue to consult with the U.S. Fish and Wildlife Service on plans that might affect the health of migratory birds.

- *Threatened or Endangered Species and Species of Concern* — Consult with the National Marine Fisheries Service, the U.S. Fish and Wildlife Service, and the D.C. Department of the Environment on all projects such as shoreline work that could potentially impact habitat for shortnose sturgeon. Incorporate mitigation actions during normal park operations as well as before, during, and after construction to minimize immediate and long- term impacts on rare, threatened, or endangered species. Actions and mitigations will vary by specific project and area affected. Many

of the measures listed above for vegetation and wildlife will also benefit any potential rare, threatened, or endangered species by helping preserve habitat.

Protection and early planning actions include (1) conducting surveys for rare, threatened, or endangered species as warranted; (2) locating and designing facilities and actions to avoid adverse effects on these species; if avoidance is infeasible, minimizing and compensating for adverse effects as appropriate and in consultation with the appropriate resource agencies; and conducting work outside of critical periods for specific species; (3) developing and implementing restoration and/or monitoring plans as warranted, including methods for implementation, performance standards, monitoring criteria, and adaptive management techniques; and (4) implementing measures to reduce the adverse impacts of nonnative plants and wildlife on rare, threatened, or endangered species.

Social Monitoring and Adaptive Management

Resource standards and user capacities have been established. Monitoring use will be critical to determining if and when standards are not being met. Different monitoring programs will be developed for normal visitation and permitted activities. Additionally, the NPS will continue to improve visitation counting methodologies. NPS staff will continue to gather information through annual visitor and other surveys, and to assess activities to determine if improvements can be made to either visitor experiences or resource conditions.

Social monitoring at memorials will track normal visitation and will examine whether desired conditions are being met or exceeded. When it is evident over an extended period that the desired memorial experiences cannot be achieved and that general use levels are being consistently exceeded, the NPS will identify adaptive management techniques to mitigate adverse effects on visitor experiences. Elements of visitor experiences that will be desirable to maintain include ease of access, opportunities for contemplation, education, photography, seeing or reading memorial elements, and enjoying a memorial's ambience.

The monitoring of permitted activities will track and compile use and impact data related to First Amendment gatherings, national celebrations, special events, permitted organized recreation, and commercial filming. While respectful of First Amendment rights, the monitoring will include tracking events, event days, and locations; estimated sizes of events and general accuracy of estimates; weather conditions and temperatures; related planning documents; and fees, bonds, and permit compliance. Monitoring will also use pre- and post- permitted activity checklists, photo records, and pre- and post- permitted activity testing of equipment, such as irrigation systems and other utilities, or soil conditions and compaction as needed, depending on location, season, and size of an event. In addition, the NPS will use incentive programs to encourage shorter, low- impact, green, and sustainable permitted activities.

When standards are not being met because of permitted activities, the following types of steps may be taken to mitigate impacts:

- revise the required recovery periods after permitted activities to shorten the permitted activity or its setup and takedown times
- require longer recovery periods between special events and national celebrations
- track and enforce compliance with permit conditions
- modify regulations for national celebrations, special events, and commercial filming (not First Amendment gatherings)
- increase bonding requirements and cost recovery efforts (not First Amendment gatherings)

If measures such as these are not effective, more stringent restoration measures may be recommended or required.

The NPS will also undertake more detailed implementation plans to lay out how to achieve desired resource conditions. Progress in meeting these conditions will be monitored as part of annual work plans, which will include the following:

- a soils and turf management and restoration plan to rebuild healthy soils and describe appropriate soil treatment programs and schedules for areas within the National Mall
- a plan to preserve and restore special status vegetation, such as trees, turf, and other vegetation that is part of the historic landscape, including methods to increase onsite plant biomass and to reduce the carbon footprint
- a sustainable water management plan to address onsite water quality, irrigation, water cleansing, minimized use of potable water, ornamental water features, graywater use, and stormwater management

OTHER ALTERNATIVES CONSIDERED

The NPS considered a number of actions and alternatives, some of which were considered but dismissed from further study as explained in the *Final Plan EIS*. The selected alternative shares actions from each of the alternatives considered in the *Final Plan EIS*; likewise, there are actions common to all of these alternatives. These are the key aspects of the alternatives that were considered.

No-Action Alternative

The no- action alternative describes how current management would be continued, and it identifies those plans and actions already moving forward. Park staff would continue standard maintenance activities and undertake deferred maintenance projects as funding permits. This alternative established the baseline for the comparison of all the other alternatives, showing the long- term effects of continuing present courses of action, particularly related to spaces not designed for current levels of use, a high degree of wear and tear affecting the historic landscape, a large amount of deferred maintenance, aging infrastructure, pedestrian and bicycle circulation issues, and a lack of visitor facilities and poorly distributed facilities.

Alternative A

Alternative A focuses on the historic landscape and education. It would restore and maintain the resources of the National Mall as a historic landscape. The designed historic landscape would evolve and its value over time would change, reflecting significant national events. Contemporary uses would be accommodated while respecting the planned historic character and visions of the L'Enfant and McMillan plans. The NPS would ensure compatible and enduring high- quality design, as well as the highest facility maintenance standards, to create a sense of place that would reinforce the civic, historic, and symbolic functions that the National Mall serves for our nation.

Alternative B

Alternative B focuses on creating a welcoming national civic space for public gatherings, events, and high- use levels. It would improve the National Mall as the nation's premier civic space and would support very high use levels. The National Mall's evolving ceremonial, celebratory, cultural, and visitor uses would be emphasized. Diverse peoples would be welcomed through multilingual educational opportunities, and the needs of large groups including those arriving by tour bus, demonstrators, and event participants would be met. Some areas would be redesigned to provide a more sustainable civic forum and a stage for First Amendment demonstrations and other events. The NPS would ensure

compatible and enduring high- quality design, as well as the highest facility maintenance standards, to create a sense of place that would reinforce the civic, historic, and symbolic functions that the National Mall serves for our nation.

Alternative C

Alternative C focuses on urban open space, urban ecology, recreation, and healthy lifestyles. It would meet evolving recreational needs in the nation’s capital by providing beautiful, enjoyable, and ecologically sustainable open spaces that could be adapted to changing recreational patterns of diverse local and national users. This concept would contribute to healthy lifestyles, healthy parks, and healthy, more sustainable cities. Recreational activities would be expanded by redesigning some areas, increasing recreation equipment rentals (such as boats, skates, and bicycles), adding playgrounds, and emphasizing connections to the recreational and enjoyment opportunities in East Potomac Park, the Georgetown Waterfront, and Rock Creek Park, as well as the southwest waterfront. The NPS would ensure compatible and enduring high- quality design, as well as the highest facility maintenance standards, to create a sense of place that would reinforce the civic, historic, and symbolic functions that the National Mall serves for our nation.

THE BASIS FOR THE DECISION

The decision to select the preferred alternative for implementation is based on the degree to which it meets the planning objectives and the criteria that were used in evaluating alternative actions, as well as the environmental analysis.

Planning Objectives

When the NPS started the National Mall planning effort, it worked with cooperating agencies to develop 21 planning principles. Through public comment and other input, these principles evolved into planning objectives, and the alternatives considered in the *Final Plan/EIS* were compared to see how well they satisfied these objectives. The selected action — the preferred alternative — most consistently satisfied all of the objectives, as described below.

Cultural Resource Protection

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

The plan meets this objective by protecting vegetation that defines and perpetuates historic vistas; by continuing the predominance of east- west vistas, with improved multiple north- south vistas; by encouraging view protection when temporary facilities are put in place; and by locating facilities outside view corridors.

Objective: Monuments, memorials, and their settings are preserved and protected.

Monuments and memorials will be rehabilitated as needed, and cultural landscape conditions will be preserved and protected.

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

The plan will respect the historic L’Enfant and McMillan plans, and actions will be coordinated with the NCP’s *Legacy Plan* and related plans.

Natural Resource Protection

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

The plan meets this objective by reversing soil compaction and improving soil conditions, with better air and water infiltration; by improving plant growing conditions and constructing wider walks and using edging / curbs and post- and- chain fencing to protect vegetation from trampling; by improving water quality, reducing water use, using nonpotable water sources for display fountains, and reusing graywater; and by implementing study recommendations to reduce urban flooding.

Demonstrations, Special Events, and National Celebrations

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

The plan will ensure that this essential purpose of the National Mall continues, and it will make greater participation possible with improved and more flexible venues.

Objective: 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 is unacceptably compromised by others, now or in the future.

The plan meets this objective through equitable space distribution plus natural resource restoration and time for general visitation and recreation, as well as through improved permitting procedures and management.

Objective: 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.

The plan meets this objective by redesigning high- use venues to flexibly meet needs and reduce impacts, encouraging offsite participation through simulcasts.

Access and Circulation

Objective: To fulfill its symbolic and civic importance, the National Mall is a role model of inclusiveness and universal design for all citizens.

Civic venues will be designed to be universally accessible; universal accessibility standards will be met with improved walks and circulation routes. Wheelchair or electric scooter rentals will be provided, as well as supplementary roving courtesy shuttles for elderly visitors, families with small children, or others as needed. Parking and/or drop- offs for visitors with disabilities will be increased, and all future visitor transportation buses will be required to be fully accessible.

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

The plan meets this objective by improving walking and bicycling environments, with separate bike routes and possibly traffic calming measures; by upgrading crosswalks and providing longer crossing times; by offering supplementary transportation to meet visitor needs; by developing parking programs with offsite garages; by renaming the Smithsonian Metro station to identify the National Mall; and by providing a welcome plaza for visitor orientation.

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

The plan meets this objective by providing better pedestrian amenities, pedestrian entry areas, and crosswalks that emphasize pedestrian safety and connections to the fabric of the city; and by improving access and connections with road realignments.

The objective is partially met through existing physical connections to the circulation patterns of the city with National Mall road systems, tunnels, and walks.

Visitor Information, Education, and Enjoyment

Objective: The National Mall provides the quintessential American experience where

- *visitors can feel welcome*

The plan will enhance visitor services with a welcome plaza, multilingual programs, an improved park website that is easier to navigate, and increased coordination with adjacent museums. The onsite communication network will be improved, and a mass notification system will be provided. Guest services training will be provided for staff.

- *visitors fully understand the importance of this preeminent civic area for First Amendment rights*

Programs about First Amendment rights and the role of the National Mall will be improved and supported by wayside signs.

- *visitors 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*

The plan will increase education about all memorials, their values and ties to American culture, history, and our democratic form of government. It will also provide better opportunities for visitor connections due to improved quality of all facilities and appropriate programs at multi-purpose facilities. Operating hours at the Washington Monument will be extended during the peak visitor season.

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

Resource conditions — vistas, plant materials, walks, lighting — will be improved while respecting the historic character and limiting light pollution.

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

The plan calls for reestablishing an interagency lighting task force and for protecting the lighting and nighttime character of the five icons in the monumental core. Energy- efficient pedestrian lighting that respects the memorials, protects nighttime character, and limits light pollution will be provided.

Objective: Visitor information is convenient, accurate, easy to understand, and consistent throughout the site. Information and programs are universally accessible and reach the widest audience possible.

The plan meets this objective by providing cell phone tours; reviewing materials sold at book-stores or stands for accuracy; working with groups to disseminate accurate information; improving park websites; and providing advance planning information.

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

Information about the National Mall's civic role will be expanded through signs, education, way-sides, and websites.

Objective: 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.

The plan will offer a variety of programs, including maps, brochures, handouts, ranger talks, cell phone tours, bicycling tours, radio information, and educational waysides. More living history and interactive programs will be provided, and programs will be planned to take advantage of technological advances.

Objective: 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.

The plan meets this objective by improving conditions for athletic fields and volleyball courts with nearby restrooms and drinking water, as well as passive recreation areas (including seating); by upgrading the pedestrian environment; by adding bike lanes to improve bicycling; and by offering more choice in potential recreation equipment rentals such as bikes, boats, model boats, and ice skates.

Objective: The National Mall continues to function as an important part of the D.C. park and open space network.

Local active recreation needs for organized sports will continue to be satisfied on the National Mall through D.C. permitted use of athletic fields — 12 multipurpose fields and 11 volleyball courts, along with NPS permitted use of 15 multipurpose fields. The National Mall will remain a very large open space in the urban core.

Visitor Amenities

Objective: 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. Facilities are also appropriate for public commemorative and symbolic spaces in our nation's capital.

The plan meets this objective by providing high- quality facilities that reinforce the sense of place.

Objective: Various visitor and commercial amenities are provided that are conveniently located and that are sized and configured to flexibly meet visitor- use patterns during the peak season.

Facilities will be convenient, evenly dispersed, and easier for visitors to find. Facilities will be sized for general high levels of use, and restrooms will be provided near food service locations.

Health, Public Safety, and Security

Objective: Safe, healthy, secure visits are provided.

The plan will improve pedestrian lighting for safer nighttime visitation, improve crosswalks and extend countdowns, provide separate bike lanes or routes, install emergency call boxes, and provide misters and interactive water features for summer heat and humidity relief, along with more seating in shady areas.

Objective: Visitors have adequate information to find their way around or notification of what to do in emergency situations.

The plan meets this objective by providing a new sign system, interagency preparedness programs with shelters /safe havens or evacuation plans, electronic variable message signs, staff notification and emergency call systems, and an emergency notification system.

Objective: The National Mall, including all walks and facilities, is a showcase for inclusiveness and universal design.

The plan will meet universal accessibility standards with improved walks, circulation routes, facilities, and civic venues.

Park Operations

Objective: The National Mall is a role model in sustainable urban park development, resource protection, and management, focusing on six areas: requirements and policy, resource health, water use, circulation, facilities, and park operations.

The plan meets this objective (1) for *requirements and policy* by meeting or exceeding green and sustainable policy requirements, as well as deadlines for policy requirements; (2) for *resource health* by increasing resource monitoring, using science-based decision making, restoring soil and tree health, protecting special status trees, reducing impacts from high-use levels, preserving or restoring plant biomass, and implementing recommendations of the Sustainable Sites Initiative™; (3) for *water use* by increasing nonpotable water use in large designed water features and in irrigation, coupled with decreased potable water use; captured, stored, filtered, and reused stormwater and graywater; using sustainable surface materials to collect stormwater; and a vegetated Potomac River shoreline where feasible; (4) for *circulation* by facilitating pedestrian circulation, providing alternative-fuel visitor transportation vehicles, coordinating a multimodal transportation system, and providing separate bike routes plus bike rentals; (5) for *facilities* by satisfying or exceeding the NPS silver LEED requirement at new facilities, plus providing visitor education about sustainability; and (6) for *park operations* by designing all new and improved facilities for ease of maintenance and efficiency; reducing energy consumption with renewable energy sources; expanding the alternative-fuel vehicle fleet; continuing the staff bike-sharing program; reducing solid waste; increasing recycling and composting; and for events, providing online permitting and scheduling, increasing recycling and related education, and encouraging other green practices during events.

Objective: Facilities are consistently maintained to the desired standards of excellence.

New standards will be developed for all facilities.

Objective: All maintenance and park operations emphasize efficient, effective, and sustainable practices.

Maintenance and operations will be improved and made more efficient and sustainable.

Objective: Cooperating agencies coordinate planning, information, services, facilities, and programs for visitors, residents, and the local workforce.

Cooperation and coordination for information and onsite communication will be increased.

The Criteria Used to Evaluate Alternative Actions

During the planning process five value analysis workshops were held and were attended by cooperating agencies. Using the Choosing-by-Advantages (CBA) process, the workshops analyzed all of the preliminary alternatives and used criteria to compare, rate, and rank the advantages of alternative actions and to develop an agency preferred alternative. This process looked at how well each alternative would address the following factors ranked in order of the factor's importance to the planning as determined through the CBA process, not the importance of the resources themselves:

1. providing enjoyable visitor experiences — a quality American experience
2. improving natural resources
3. improving the ability to host national celebrations, First Amendment demonstrations, and special events
4. improving health and safety

5. protecting cultural resources — since cultural resources must be protected, there was little difference among the alternatives in how this would be done so this factor did not rank as high
6. improving park operations
7. providing other benefits

As the ranking shows, the planning team and cooperating agencies determined that the most important factor for this planning effort was to provide a quality American experience. This includes enhancing visitors' abilities to understand and participate in First Amendment and/or civic activities, to have a welcoming experience, to understand core American values and history expressed by the monuments and memorials, to be able to enjoy the National Mall's beauty and vistas both by day and at night, and to be inspired. The second most important factor was the ability to improve natural resource conditions. All of the alternatives would protect cultural resources, a key aspect of enjoyable visitor experiences, so this factor was ranked lower as a distinguishing factor among the alternatives.

The CBA process is designed to make sure that nonmonetary factors are incorporated into the decision-making process, and that planning cost estimates* are also considered to maximize advantages to the government while keeping costs as low as possible. Then comparable costs of the alternatives were considered. As a result, the selected action is less costly than other action alternatives, and it combines those elements of the other alternatives that had the most advantage points. As planning began there was more than \$450 million in deferred maintenance for the National Mall. While the American Recovery and Reinvestment Act and other funding has addressed more than \$50 million of this need, there are significant common costs related to every alternative, including the no-action alternative.

Value analysis informed the development of the preferred action in a collaborative manner to ensure that decisions were aligned with plan objectives and that financial implications were understood.

Environmental Analysis

Impacts were analyzed for the following topics:

- *cultural resources* — impacts on memorials and cultural landscapes
- *natural resources* — impacts on water resources, soils, vegetation, and fish and wildlife
- *demonstrations, permitted events, and national celebrations* — impacts on participants and organizers
- *access and circulation* — impacts on visitor access, the pedestrian environment, bicycle users, and motorists
- *visitor experience* — impacts on a quality visitor experience; opportunities for information, education, enjoyment, and recreation; visitor facilities and amenities; public health and safety; and user capacity
- *socioeconomic environment* — impacts of increased visitation, impacts on commercial business and construction opportunities
- *park operations* — impacts on park conditions, safe and efficient operations, and sustainability

Long-term impacts under the selected action would range from negligible to major, and from adverse to beneficial. In addition, cumulative impacts to natural resources would be long-term, moderate, and adverse, with a slight contribution from the selected alternative, while cumulative impacts to the

* Planning cost estimates are rough estimates that allow ideas to be compared to make decisions about alternative courses of action. Planning cost estimates are not to be used for estimating projects for construction.

remaining resources analyzed would be long- term and beneficial, with slight to substantial contributions from the selected action.

FINDING OF NO IMPAIRMENT OF PARK RESOURCES AND VALUES

NPS *Management Policies 2006* provides that an impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; (2) key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or (3) identified as a specific goal in the park's general management plan or other relevant NPS planning documents. An impact would be less likely to constitute an impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values and it cannot be further mitigated.

Impairment may result from NPS activities in managing the park, visitor activities, or activities undertaken by concessionaires, contractors, and others operating in the park. Impairment may also result from sources or activities outside the park. In the *Final Plan/EIS*, an impairment determination was included in the conclusion statement for all impact topics related to the park's natural and cultural resources and values. While the impacts to demonstrations / permitted events / national celebrations, access and circulation, visitor experience, socioeconomic environment, and park operations were analyzed, no impairment determinations were made because under NPS guidelines these impact areas are not generally considered to be park resources or values.

Overall, the implementation of the selected alternative will not inhibit the park from fulfilling its specific purposes, as identified in the laws and other authorizations for the National Mall and those for specific memorials, monuments, and other features; and it will not result in any major adverse impacts to the integrity of the park's cultural or natural resources or prohibit opportunities for its enjoyment. In addition, all practical means to avoid, minimize, or mitigate environmental harm that could result from the selected alternative have been adopted. As a result, the National Park Service has determined that implementation of the selected alternative will not constitute an impairment to the natural or cultural resources or values of the National Mall and will not violate the NPS Organic Act. This conclusion is based on a thorough analysis of the environmental impacts described in the *Final Plan/EIS*, relevant studies, the review of public comments and consultation with other agencies and organizations, and the professional judgment of the decision maker, guided by the direction in NPS *Management Policies 2006*. Moreover, certain other laws that apply to the National Mall serve to limit activities that could lead to impairment. The Commemorative Works Act prohibits the establishment of additional memorials and visitor centers within the Reserve, which includes the areas within the monumental core administered by the NPS, while there are other laws requiring review and other actions by the National Capital Planning Commission and the Commission of Fine Arts. The rationale for this determination of no impairment is provided below.

Cultural Resources: Cultural resources within the National Mall, which include memorials and cultural landscapes, are symbols of our nation and are fundamental resources critical to the overall purpose of the park. There are multiple historic districts such as East and West Potomac Park within the study area and additional districts to the north. The following cultural landscapes are within the National Mall: Union Square, the Mall, Washington Monument and Grounds, Constitution Gardens, the D.C. War Memorial, the Thomas Jefferson Memorial, and the Lincoln Memorial Grounds (including the component landscapes of the Reflecting Pool, Lincoln Circle and Radial Roads, and the Watergate area). There are also many properties listed on the National Register of Historic Places.

In accordance with the Advisory Council on Historic Preservation's criteria of adverse effects in the regulations for compliance with NHPA Section 106 at 36 CFR 800.5, the implementation of specific actions of the selected alternative will have potential adverse effects on historic resources; therefore,

the NPS has entered into an NHPA Section 106 Programmatic Agreement, and pursuant to that agreement further consultation will be required to make a final determination of effect on individual projects and to identify appropriate mitigation measures for these actions.

While one of the primary goals of the National Mall Plan is the protection and preservation of its cultural resources by preserving memorials, emphasizing the planned views and vistas, and respecting the historic plans, implementation of certain actions associated with the selected alternative will result in long- term, negligible to moderate, adverse impacts such as changes to paving, wider walks, and addition of curbs. These impacts will not cause impairment of the National Mall's cultural resources because care will be taken during the Section 106 consultation process to protect the contributing features and character.

The *Final Plan/EIS* states that a new design for Union Square, which was redeveloped in the 1970s, could result in long- term, minor to major, adverse impacts on cultural resources. However, this proposed redesign will require further NEPA and NHPA Section 106 compliance, and NPS intends through that compliance and its design competition criteria to avoid, minimize, and mitigate adverse impacts to these resources to the greatest extent possible. A design competition has been recommended for Union Square. The design competition criteria will highlight requirements to protect historic resources, and combined with consultation should ensure that no major adverse impacts would occur. A plan objective is to highlight, preserve, and protect the historic U.S. Grant Memorial and historic vegetation and make Union Square into a sustainable civic square that takes pressure off the historic landscape of the Mall. Although adverse impacts could affect the Capitol Reflecting Pool, related walks and pavement, and light fixtures dating from the 1970s, they would not constitute impairment because these features are of recent date and are not contributing features.

As a result of the overarching goal of the plan to preserve and protect the National Mall's cultural resources and the required continued consultation, there will be no impairment of cultural resources under the selected alternative. The new plan will protect those cultural resources critical to the overall purpose of the park, will not inhibit opportunities for visitors to enjoy the park and the interpretation of its resources, will protect scenery and views, and will meet objectives for a sustainable National Mall that can absorb high use levels.

Natural Resources: Natural resources help to fulfill the National Mall's purpose by creating the recognizable symbolic space.

The selected alternative will result in both adverse and beneficial, long- term, minor to moderate impacts on natural resources (water resources, soils, vegetation, and fish and wildlife). Water quality in large designed water features such as the Lincoln and Capitol Reflecting pools and Constitution Gardens Lake will be improved in the selected and other action alternatives, primarily as the result of increased water circulation and reduction in algae. Use of potable water will be reduced, and stormwater will be reused.

The National Mall contains many imported soils; these soils may be eroded, compacted, and have reduced infiltration capacity as the result of high use levels. This affects vegetation as well as contributes to urban flooding because of reduced water percolation. However, certain actions within the selected alternative are aimed at improving the condition of the soil, which will improve overall soil productivity and water infiltration.

Vegetation on the National Mall typically includes introduced and naturalized species, and its biological productivity or sustainability is affected by the volume of use, erosion, and visitor- created social trails. The selected alternative will improve the condition of vegetation through an irrigation system, wider walks, and design cues.

Impairment of native and naturalized fish and other wildlife populations will not result from implementation of the selected alternative. The plan will have a number of beneficial effects for fish and wildlife, due to improved public stewardship messages, creation of a self-sustaining ecosystem at Constitution Gardens Lake, continued control of nonnative Canada goose populations, and the long-term effects of rebuilding Tidal Basin seawalls and replacing portions of the wall along the Potomac River. Various construction projects will have impacts on fish and wildlife, most of which are expected to be temporary, and some of which will be further examined as part of any NEPA compliance needed for those projects. Adding or widening sidewalks and walkways, as well as removing the Capitol Reflecting Pool and potentially slightly reducing the size of the Tidal Basin, could result in some losses of fish or wildlife habitat, but these losses would generally be negligible.

While the National Mall provides a large amount of green space within a largely urbanized setting, with passive and active recreational open space, its overall purpose lies with its cultural symbolism and civic stage function. The natural resources (i.e., water resources, soils, vegetation, and fish and wildlife) that will be adversely impacted to some extent by the implementation of the selected alternative are not key to the overall integrity of the natural resources, and the selected alternative is also expected to substantially improve the condition of many of these resources. Nor will the impacts inhibit the overall enjoyment of these resources. Therefore, there will be no impairment of natural resources under the plan.

Finally, the actions proposed in the plan should not lead to impairment of NPS goals for the National Mall as contained in a general management plan or other NPS planning document, because the approved plan is essentially that general management plan and these actions have been designed in furtherance of these NPS goals.

THE ENVIRONMENTALLY PREFERRED ALTERNATIVE

NEPA defines the environmentally preferred alternative as the alternative that will promote the national environmental policy as expressed in NEPA Section 101(b), which states that it is the continuing responsibility of the federal government to improve and coordinate federal plans, functions, programs, and resources in order to

- (1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- (2) ensure for all Americans safe, healthful, productive and aesthetically and culturally pleasing surroundings;
- (3) attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or undesirable or unintended consequences;
- (4) preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- (5) achieve a balance between population and resource use that will permit high standards of living and wide sharing of life's amenities; and
- (6) enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The selected action, which was the preferred alternative in the *Final Plan/EIS*, was developed by combining the advantages of the other alternatives, and resource conditions will be greatly improved to help achieve the paramount goal of enriching and providing a quality American experience for all. The ability of current and future generations to experience First Amendment rights, national celebrations, and special events will be ensured through improved sustainable venues. An understanding of core American values and the symbolic meanings of memorials will be improved through responsible

stewardship, preservation, and shared educational opportunities. Visitors will feel welcome and will be able to share in nationally significant symbols, national and patriotic activities, and amenities. Efforts to improve the day and nighttime appearance of the National Mall will allow visitors to be able to better appreciate its beauty. The selected action will address high levels of use and improve conditions.

Taken as a whole, the selected action is the environmentally preferred alternative because it best meets all six goals of NEPA.

- *Goal 1* — Trustee of the environment responsibilities will be enhanced by addressing the impacts of events on natural resources; improving the health of resources; controlling potential memorial damage through education and improved visitor service locations; and improving waste management.

- *Goal 2* — Safe, healthy environments will be provided by completing perimeter security; providing additional restrooms co-located with drinking fountains; enhancing pedestrian lighting of walks; improving pedestrian walks/crosswalks and connections into the city; providing separate bicycle lanes; and installing improved communication and emergency notification systems.

Aesthetically and culturally pleasing environments will be provided through improved natural resource conditions; pleasant multipurpose visitor service destinations where visitors can appreciate cultural icons and enjoy appropriate educational, performance, and entertainment opportunities; and visitor facilities that are contextually compatible with cultural landscapes.

- *Goal 3* — A wide range of beneficial uses without environmental degradation will be accommodated through an improved ability of the NPS to provide event venues that can withstand high levels of use while placing additional areas off-limits to temporary facilities. Diverse educational programs will address civic space, memorials, historic plans and development, and issues related to stewardship and sustainability.
- *Goal 4* — The National Mall's important historic and cultural aspects are integral to our national heritage. It is an environment that supports diversity and variety of individual choice, where all visitors can come for contemplation, commemoration, demonstration, and celebration.
- *Goal 5* — The preservation of public resources will be balanced with public enjoyment, civic activity, national celebration, and recreation in a sustainable manner.
- *Goal 6* — Renewable resources will be emphasized through sustainable water management; facilities that are energy efficient and models of sustainability; solid waste and recycling improvements; and an emphasis on providing an improved walkable, bikable environment and a revised alternative transportation system.

PUBLIC AND AGENCY INVOLVEMENT

The NPS announced it would prepare a management plan for the National Mall at a press conference on November 1, 2006, after it released a newsletter describing the intent of the project. A *Federal Register* notice was published on January 16, 2007, stating that the plan would provide a long-term vision for the use and management of the National Mall and would be developed pursuant to NEPA requirements. On September 6, 2007, another notice was published in the *Federal Register* that an EIS would be prepared as part of the planning process under NEPA.

The public involvement process paralleled the planning process and occurred in two phases. The first phase established the context for the plan, including the purpose and significance of the National Mall, the need for the plan, and objectives. Two newsletters were issued during this phase. Newsletter 1, issued in fall 2006, announced the project, described the purpose and significance of the National Mall, and invited the public to participate in scoping by submitting comments about problems and concerns. In response, more than 5,000 public comments were received, and they were summarized in

newsletter 2, which was released in summer 2007. Newsletter 1 also announced a National Mall symposium on future use and management.

The NPS symposium was held November 13–15, 2006, and had over 150 participants during the final day which was open to the public. Speakers included representatives from NPS, other federal and local agencies, academia, and experts in related fields. DCs Congressional Representative Ms. Eleanor Holmes Norton and then- mayor Anthony Williams made presentations. Speakers also included nationally recognized experts in wide ranging topics, including the history and significance of the National Mall, the protection of its resources, freedom of speech and First Amendment rights, public use, urban parks, visitor services, and best practices in managing similar areas.

The second phase was development of the alternatives, and two more newsletters were issued. Newsletter 3, released in fall 2007, presented a preliminary range of alternatives for the National Mall, and the public was asked to comment on what they would like in a preferred alternative. This generated around 18,000 comments during the comment period, and thousands more after the comment period closed. The majority expressed concern about the protection of First Amendment rights. This feedback was then used to help develop the preferred alternative, which was presented in newsletter 4 in spring 2009 and announced another opportunity for public involvement before the *Draft Plan/EIS* was issued. Newsletter 4 reaffirmed the protection of First Amendment rights on the National Mall. About 1,600 comments were received during the comment period. A blue ribbon panel of architects, landscape architects, and planners also provided input during this public comment period.

All newsletters and background information were posted online at <http://www.nps.gov/nationalmallplan>. The National Mall plan mailing list was continually revised to add those who commented via the website, fax, e- mail, letter, or otherwise asked to be added included during meetings and numerous presentations to community and stakeholder groups.

Because of interest in and concern about the National Mall's cultural resources, NHPA Section 106 consultation began when the range of alternatives was developed. More than a dozen consultation meetings were held beginning in January 2008, including bus and walking tours. Participants provided numerous comments during meetings and submitted written comments.

The notice of availability of the *Draft Plan/EIS* was published in the *Federal Register* on December 18, 2009, and it was accompanied by a press release, e- mail announcements sent to more than 13,000 people, and four Tweet electronic messages. More than 400 distinct comments were received from 11 cooperating agencies, 12 consulting parties, 3 regional governments, 9 organizations, and 88 individuals; these comments were responded to in volume 2 of the *Final Plan/EIS*. The *Final Plan/EIS* was released on July 13, 2010, for a 30- day no- action period. Approximately 6,850 CDs of the document were distributed, plus 175 printed copies. NPS received three comment letters. These letters and the NPS responses are available for review at the National Mall and Memorial Parks headquarters.

As elements of the plan are implemented, the NPS will continue public involvement and specifically NHPA Section 106 consultations pursuant to the Programmatic Agreement and the regulations. Moreover, there will be further opportunity for public involvement as projects of the plan are considered by the Commission of Fine Arts and the National Capital Planning Commission. Finally, the NPS will continue to work with city and federal agencies and organizations on issues of mutual concern and public interest.

STATEMENT OF FINDINGS FOR FLOODPLAIN MANAGEMENT

STATEMENT OF FINDINGS FOR EXECUTIVE ORDER 11988: FLOODPLAIN MANAGEMENT

National Mall Plan

Washington, D.C.

Recommended:  9/17/10
Superintendent, National Mall and Memorial Parks Date

Concurred:  9/24/2010
Chief, Water Resources Division Date

Concurred:  9/23/2010
Compliance or Safety Officer, National Capital Region Date

Approved:  9/30/10
Director, National Capital Region Date

The above signatures certify that this document is technically adequate and consistent with NPS policy.

Executive Order 11988 (“Floodplain Management”) requires the National Park Service and other agencies to evaluate the likely impacts of actions in floodplains. This statement of findings (SOF) has been prepared to comply with EO 11988.

In managing floodplains on park lands, the National Park Service policy is to (1) manage for the preservation of floodplain values; (2) minimize potentially hazardous conditions associated with flooding; and (3) comply with the NPS Organic Act and all other federal laws and Executive Orders related to the management of activities in flood-prone areas (*Management Policies* Sec. 4.6.4). This SOF is considered a part of the Environmental Impact Assessment associated with the *National Mall Plan*.

PROPOSED ACTION

The National Park Service proposes to implement the preferred alternative of the *Final National Mall Plan / Environmental Impact Statement*.

The *National Mall Plan* performs two critical functions for Park Service managers. First, by describing specific desirable resource conditions and visitor experiences for the National Mall, it establishes a clear direction for management of resources and visitation. Second, the management plan provides a framework to guide park management decision-making for up to 50 years. The *National Mall Plan* was developed in consultation with interested parties including federal, state, and local agencies as well as the public.

The plan provides overall direction for park management but specific actions needed to implement the plan will be provided in subsequent plans. Because the plan is general in nature, floodplain analysis is also general. Site-specific environmental analysis and compliance documentation will be completed for individual actions prescribed in the plan.

The preferred alternative will continue to use and retain existing facilities in floodplain areas within the park. One additional visitor facility is planned within the floodplain. Other construction will be replacement of existing facilities. Land use patterns and visitation levels will not change appreciably from current situations.

SITE DESCRIPTION AND BACKGROUND

The National Mall is located along the Atlantic seaboard. The majority of precipitation comes in the form of rains with some typically minor winter snows. Extended storms are capable of dropping several inches of rain in a 24 to 48 hour period which can cause temporary flooding of low-lying areas.

Floodplains in the planning area are associated with the Potomac and Anacostia rivers. Most of the southern portions of the planning area were created from fill dredged from the rivers or the Washington Channel. These areas remain as low-elevation flats within the identified floodplains. Occasionally, extreme high tides will result in a tidal flow up the Potomac River from Chesapeake Bay and cause overflowing of the river banks or the Tidal Basin. High water events have led to inundation of relatively small areas of open lawns and playing fields.

The Federal Emergency Management Agency (FEMA) has identified 100-year and 500-year flood hazard areas in the District of Columbia (see Floodplains map; the 500-year floodplain is slightly larger than the 100-year floodplain shown).



Figure SOF-1. Floodplains Map

Development within the floodplains includes primary and secondary roads, monuments, visitor services (restrooms, information kiosks, food services, etc.), sidewalks, and park operation facilities. Some structures are historic, and moving them would be considered an adverse effect. The Lincoln Memorial, Jefferson Memorial, and Washington Monument are built on elevated ground and are out of the floodplain.

These facilities are determined to be in Action Class I according to the definitions in Director’s Order 77-2: “Class I includes the location or construction of administrative, residential, warehouse and maintenance buildings, non-expected parking lots or other man-made features, which by their nature entice or require individuals to occupy the site, are prone to flood damage, or result in impacts to natural floodplain values. Actions in this class are subject to the floodplain policies and procedures if they lie within the 100-year regulatory floodplain (the base floodplain).”

JUSTIFICATION FOR CONTINUED USE OF THE FLOODPLAIN

As described above, some of the park development is in the 100-year or 500-year floodplains. Development and public use in these areas has been in place for many years. The situations that lead up to flooding of the rivers, and the scope and duration of high water events are well known by park staff.

Actions proposed in the preferred alternative include the retention of roads, monuments, visitor services, and park operation facilities within 100-year and 500-year floodplains. The facilities are historically and functionally dependent on their locations.

Moving entire developed areas out of the floodplains would be cost-prohibitive and would adversely affect historic resources.

SPECIFIC FLOOD RISKS

Conditions associated with flooding in the locations discussed in this statement are not considered particularly hazardous to people or property. Flooding generally occurs gradually in the planning area as a result of prolonged rainfall, making warning and evacuation a practical option for protection of human life.

Park development in the floodplains has been in place for many decades and the situations, scope, and duration of flooding of the rivers are well known by park staff. The timing, depth, and velocity of floodwaters will be considered when preparing evacuation plans.

An evacuation plan will be prepared to identify high ground safe areas and evacuation routes for each area of visitor concentration. In the event that it should become necessary to evacuate visitors and NPS personnel, it could be readily accomplished along the many access roads.

There will be no additional storage facilities for fuels or toxic materials, or museum collections in a floodplain as a result of the preferred alternative.

MITIGATION

An evacuation plan for each developed area in a floodplain will be prepared to identify high ground safe areas and evacuation strategies. Water levels will be monitored by park staff and, if flooding is imminent, visitors will be informed of evacuation procedures.

No major new construction in floodplains is prescribed in the preferred alternative. Nonetheless, site-specific environmental analysis will be conducted for all construction and will address potential impacts to floodplains.

SUMMARY

The National Park Service has determined that implementing the preferred alternative will not result in any additional disruption of floodplains. Risk to life from flooding is minimal and can be mitigated. The National Park Service will allow existing structures to remain in their current locations because there are no reasonable alternative locations. One additional visitor facility is planned within the floodplain. Other construction will be replacement of existing facilities. Water levels will continue to be monitored by park staff. Visitors will be informed of changes caused by heavy precipitation events through regular interpretation and local media.

Therefore, the proposed action will not have any additional adverse impacts on floodplains and their associated values.

The environmental impact statement, this statement of findings for Executive Order 11988, and the signed record of decision complete the requirements of the National Environmental Policy Act for the *National Mall Plan*.

STATEMENT OF FINDINGS REFERENCES

Executive Order 11988, "Floodplain Management" (May 28, 1980).

National Park Service, U.S. Department of the Interior
2003 *Director's Order 77-2: Floodplain Management*. Washington, DC.

2006 *Management Policies*. Washington DC.