

Dwight D. Eisenhower Memorial Design

Washington, DC



Responsible Federal Agency Prepared in Association with

September, 2011



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EXECUTIVE SUMMARY

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EXECUTIVE SUMMARY

The National Park Service (NPS), in association with the Eisenhower Memorial Commission (EMC) and in cooperation with the National Capital Planning Commission (NCPC) and the U.S. General Services Administration (GSA), has prepared an Environmental Assessment (EA) to evaluate impacts of three alternatives for the design of a national memorial to President Dwight D. Eisenhower. The Memorial site is bounded by Independence Avenue SW to the north, 4th and 6th Streets SW to the east and west, respectively, and the Lyndon Baines Johnson Building to the south. Additionally, Maryland Avenue SW bisects the site diagonally.

The purpose of the proposed action is to establish a national memorial for Dwight D. Eisenhower that reflects “his unique contributions to America as a patriot and a hero; lifelong public servant; outstanding military officer; and beloved President” (EMC, 2005). The proposed action is necessary given the significance of Dwight D. Eisenhower and the lack of a national memorial to him. Eisenhower served as the 34th President of the United States, and he ranks as one of the preeminent figures in global history from the 20th century.

This EA presents three design concepts, or action alternatives, and a No Action Alternative. The design concepts feature bas relief blocks, a water feature, a central Memorial grove, and a colonnade, whose columns would range from 50 to an average of 78 feet in height and 10 to 12 feet in diameter. Alternative 3 would also contain three metal tapestries to frame the eastern, western, and southern boundaries of the site. Visitor services, such as restrooms, ranger contact station, and book sales area, would be included. All of the action alternatives would include the transfer of land from GSA and DC Department of Transportation (DDOT) to NPS for the operation

of the Memorial. GSA would retain jurisdiction over the 50 feet immediately adjacent to the LBJ Building, forming the LBJ Promenade. All action alternatives would realign the Maryland Avenue corridor to its historic orientation. Alternative 1 would keep it open to vehicular traffic, while Alternatives 2 and 3 would close it to vehicular traffic.

The implementation of the action alternatives would result in long-term beneficial impacts to soils, vegetation, visitor use and experience, and water resources. There would be long-term minor to moderate adverse impacts to cultural resources, also known as historic properties or historic resources, park operations and management, and transportation in the project area.

This document is being used for compliance with both the National Environmental Policy Act (NEPA) of 1969, as amended and the National Historic Preservation Act of 1966, as amended.

Note to Reviewers and Respondents

To comment on this EA, you may mail comments or submit them online at <http://parkplanning.nps.gov/NAMA> and follow the appropriate links. Please be aware that your comments and personal identifying information may be made publicly available at any time. While you may request that NPS withhold your personal information, we cannot guarantee that we will be able to do so. Please mail comments to:

Glenn DeMarr, Project Manager
National Capital Region, National Park Service
1100 Ohio Drive Southwest
Washington, DC 20242

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**DWIGHT D. EISENHOWER MEMORIAL DESIGN
ENVIRONMENTAL ASSESSMENT**

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1.0 PURPOSE AND NEED

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1.1 INTRODUCTION

The National Park Service (NPS) and the Eisenhower Memorial Commission (EMC) propose to design, construct, and operate a national memorial to Dwight D. Eisenhower to commemorate his accomplishments and achievements as the Supreme Commander of the Allied Forces in Europe in World War II, as the 34th President of the United States, and as a public servant (115 STAT. 2273). Upon its completions and acceptance the memorial would be operated and maintained by the NPS. The Eisenhower Memorial (Memorial) would be located in Washington, DC, between 4th and 6th Streets SW, and bound by Independence Avenue SW to the north (all streets are SW, unless otherwise specified). The Lyndon Baines Johnson Building (LBJ Building), which houses the Department of Education (DEd), lies to the south (see Figure 1-1). The Memorial would include commemorative features and a designed landscape to honor Eisenhower, as well as a canopy, restrooms, a ranger contact station, and a book sales area.

According to the EMC's authorizing legislation (Public Law (PL) 106-79 Section 8162 (1999)), the proposed Memorial is to be "an appropriate permanent memorial to Dwight D. Eisenhower to perpetuate his memory and his contributions to the United States," and EMC "shall consider and formulate plans for such a permanent memorial to Dwight D. Eisenhower, including its nature, design, construction, and location." The legislation authorized the construction of the Memorial and created EMC to carry out the project.

On January 10, 2002, Congress authorized EMC to establish the Eisenhower Memorial within the District of Columbia or its environs upon enactment of PL 107-117, Section 8120 (115 STAT.

2273). The Memorial is to be established in accordance with the Commemorative Works Act (PL 99.652(1986)) as amended (40 USC 89), described in Section 1.3.3. Authorization to consider a site within Area I (40 USC 89) was approved April, 2006. EMC's legislatively authorized period of performance is seven years, from April, 2006 to April, 2013.

EMC, with assistance from NPS, is responsible for designing and constructing the Memorial. Once construction is complete, NPS would be responsible for operating and maintaining the Memorial.

The design, construction, conveyance, and operation of the Eisenhower Memorial and the transfer of jurisdiction for lands currently administered by the U.S. General Services Administration (GSA) and the District of Columbia Department of Transportation (DDOT) to NPS are the subject of this environmental assessment (EA). NPS is the lead federal agency responsible for the preparation of this EA. The National Capital Planning Commission (NCPC) and GSA are cooperating agencies, which are requested or designated by the lead agency to assist in the preparation of the EA.

NPS, in association with EMC, has prepared this EA consistent with the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality (CEQ) regulations implementing NEPA [40 Code of Federal Regulations (CFR) 1500-1508 (1986)], as amended, and NPS Director's Order #12 (DO-12) . This EA has also been prepared consistent with NCPC's Environmental and Historic Preservation Policies and Procedures. In conjunction with this EA, the project is undergoing a review of potential effects on historic resources in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966.



Figure 1-1: Memorial location
Source: Google and AECOM, 2010

1.2 PURPOSE AND NEED FOR ACTION

The purpose of the proposed action is to establish a memorial for Dwight D. Eisenhower that reflects “his unique contributions to America as a patriot and a hero; lifelong public servant; outstanding military officer; and beloved President” (EMC, 2005). The proposed action is necessary given the significance of Dwight D. Eisenhower and the lack of a memorial honoring him in Washington, DC. Eisenhower served as the 34th President of the United States, and he ranks as one of the preeminent figures in global history from the 20th century.

Eisenhower was a central figure in the victorious resolution of World War II, but his lasting significance in history lies in his deep commitment to freedom, the Constitution and democracy, and his contributions to defining and sustaining an international peace for which many Americans died (EMC, 2005).

Dwight D. Eisenhower’s life of public service was built around certain basic values that he shared with most Americans. Central to his thought and his public image was a powerful dedication to democracy, and a belief in the right of the people to choose their own government and to judge the policies and the leaders who implemented the nation’s public programs (EMC, 2006).

1.3 PROJECT BACKGROUND

In October, 1999, Congress determined that a memorial to President Eisenhower was needed. It enacted PL 106-79, where it established that “the people of the United States feel a deep debt of gratitude to Dwight D. Eisenhower, who served as Supreme Commander of the Allied Forces in Europe in World War II and subsequently as the 34th President of the United States; and an appropriate permanent memorial to Dwight D. Eisenhower should be created to perpetuate his memory and his contributions to the United States.” In the law, Congress established EMC to lead the effort of establishing the permanent memorial. EMC consists of 12 members: four U.S. Senators, four U.S. Congressmen, and four Presidential Appointees. Authorization of the establishment of the memorial followed in January 2002 (115 STST. 2273) Authorization to consider a site within Area I (40 USC 89) was approved April, 2006.

Site Selection

On November 8, 2005, the National Capital Memorial Advisory

Commission (NCMAC) gave their concurrence to the preferred site, pending legislation authorizing location within Area I (discussed in Section 1.3.3). In May 2006, Congress enacted PL 109-220, noting that “the location of the commemorative work to honor Dwight D. Eisenhower..., within Area I as depicted on the map referred to in section 8908(a) of title 40, United States Code, is approved.”

In 2006, NPS, in association with EMC, completed the *Proposed Dwight D. Eisenhower Memorial Site Selection Environmental Assessment* for the selection of the preferred site (NPS and EMC, 2006). The analysis stated that a presidential memorial would

transform the “spare and uninviting plaza” into a new cultural destination near the National Mall and that no significant impact would occur due to the location of a memorial at the site. The Finding of No Significant Impact concluded that the design of the Memorial “will respect the historic significance of Maryland Avenue and its historic vista through appropriate design guidance and development limitations.” It also left open the possibility of NPS, NCPC, and the U.S. Commission of Fine Arts (CFA) to respectively develop design at the time of site approval.

On September 7, 2006 NCPC voted to approve the location for the Dwight D. Eisenhower Memorial at the site. NCPC found the site to be consistent with *Memorials and Museums Master Plan, Extending the Legacy*, and the *Federal Elements of the Comprehensive Plan for the National Capital* (as discussed in Section 1.3.3). At that time, NCPC adopted a FONSI that included a number of design principles to guide development of the Memorial design. The NCPC FONSI noted the possibility that the design principles could be further refined during the design phase Section 106 process and a resultant MOA. The design principles are listed below:

- Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue.
- Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.
- Create a unified Memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.

- Reflect L’Enfant Plan principles by shaping the Memorial site as a separate and distinct public space that complements the DEd Headquarters and other surrounding buildings.
- Respect and complement the architecture of the surrounding precinct.
- Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.
- Incorporate significant green space into the design of the Memorial.

On September 21, 2006, CFA reviewed and approved the proposed site for the Memorial. At that time, CFA chose not to adopt the design approved by NCPC and incorporated into the NCPC’s site selection FONSI. Instead, the CFA Commission members said they expected the design team to fully consider the appropriate treatment of the site in developing a concept for their review.

Memorial Design

Following site approval, EMC set out to select and contract a designer for the Memorial. In 2008, EMC solicited potential design concepts from leading architects, landscape architects, and designers. In 2009, EMC awarded Gehry Partners, LLP the commission.

Gehry Partners developed three concept design alternatives, which were refined using the Section 106 consultation process. Over the course of 20 months, four Section 106 Consulting Parties meetings were held. Representatives from NCPC, CFA, SHPO, the Advisory

Council on Historic Preservation (ACHP), DEd, the National Coalition to Save our Mall, the Committee of 100, and other parties provided comment and input.

EMC and Gehry Partners, LLP submitted conceptual plans to both CFA and NCPC in the winter of 2010-11. On January 20, 2011, CFA approved the concept plan for the Eisenhower Memorial. It is anticipated that a revised concept plan for the Memorial will be submitted to CFA in the fall of 2011 for approval.

NCPC reviewed concept plans of the Eisenhower Memorial on February 3, 2011. Given that this was only the concept review stage, no formal action was taken by NCPC. Rather, NCPC provided comments on the three design alternatives, because they do not formally approve concept plans (See Appendix D). A revised concept plan was approved by CFA on September 15, 2011.

1.3.1 Agency Relationships

Although EMC is proposing the design and construction of the Memorial, three governmental agencies currently control portions of the project site. NPS controls an approximately one half-acre portion at the northwest corner; the District of Columbia Government has administrative jurisdiction over approximately two acres; and GSA owns approximately 1.5 acres along the south side of Maryland Avenue in Square 492, which is comprised of the plaza and the LBJ Building. Prior to construction, the District of Columbia and GSA would transfer their respective portions of the site to NPS. GSA would retain jurisdiction over the 50-foot wide area adjacent to the LBJ Building (known as the LBJ Promenade), which GSA would operate as part of the building yard for DEd. Following construction,

NPS would be responsible for the long-term operation and maintenance of the Eisenhower Memorial.

Approvals Framework

The Commemorative Works Act, discussed further in Section 1.3.3, outlines the approvals necessary for a commemorative work authorized by federal law. NCMAC must be consulted regarding the selection of design concepts. In addition, NPS must submit design proposals to CFA and NCPC, for their approval. Only after these tasks are completed and approved, and the necessary funds to complete construction and preserve the Memorial are proven to be available, may a construction permit be issued, in this case (40 U.S.C. Chapter 89, Section 8906) by NPS.

In addition to its role as a cooperating agency, NCPC is required to comply with NEPA and has adopted NEPA guidance outlined in Section 4(D) of NCPC's Environmental and Historic Preservation Policies and Procedures. NCPC's design principles require applicants to prepare the necessary NEPA and Section 106 of the NHPA documents, in conformance with respective CEQ and ACHP requirements.

CFA is also required to comply with NEPA and Section 106. Although it participates as a consulting party under Section 106, CFA does not issue its own FONSI and does not participate as a cooperating agency in the NEPA process.

SHPO has reviewed the Memorial designs, as called for by the National Historic Preservation Act. Through consultation, SHPO must make determinations of effects, in consultation with any consulting parties, to historic resources as a result of the Memorial.

These determinations enable NPS and NCPC to meet their Section 106 responsibilities.

1.3.2 Purpose and Significance of the National Mall and Memorial Parks

The NPS parcel at the Memorial site is part of the National Mall and Memorial Parks (NAMA). This park unit lies within the National Capital Region, which contains numerous park units, of NPS. NAMA would manage and operate the Eisenhower Memorial upon its completion. As part of the planning process for the National Mall Plan, NPS developed a Foundation Statement (NPS, 2008) designed to create a shared understanding of the purpose and significance of NAMA.

Purpose of NAMA

As stated in the Foundation Statement, the purpose of NAMA is to

- Preserve, interpret, and manage federal park lands in the national capital on the land delineated by the L'Enfant Plan and the 1902 Senate Park Improvement Plan (commonly referred to as the McMillan Plan), including green spaces, vistas, monuments, memorials, statues, historic sites, cultural landscapes, and natural and recreation areas.
- Preserve places where important events in U.S. history occurred (e.g., the Petersen House, Pennsylvania Avenue).
- Provide opportunities for visitor contemplation, celebration, commemoration, citizen participation, recreation, and demonstration, where the full expression of

the constitutional rights of speech and peaceful assembly occur.

- Maintain space for the symbols and icons of our nation and its ideals (e.g., equality, freedom, and democracy).
- Serve as a symbol of the United States to the world.

Significance of NAMA

Park significance statements capture the essence of a park's importance to the nation's natural and cultural heritage.

Understanding park significance helps managers make decisions that preserve the resources and values necessary to the park's purpose. Several aspects of the NAMA contribute to its overall significance.

- The areas under NPS stewardship are some of the oldest public lands in the United States, dating back to 1791 when the District was established, and the L'Enfant Plan guided the creation and development of park areas.
- Much of the area managed by NAMA reflects the physical expression of the historic L'Enfant and McMillan Plans for the federal city.
- The areas managed by NAMA are vital components of the historic federal city- the singular designed urban core that from inception has physically expressed its political role as the American national capital city and seat of government.

- NAMA preserves the stage upon which historic events of national significance occurred, such as the "I Have a Dream" speech of Dr. Martin Luther King, Jr. at the Lincoln Memorial.
- The iconography, architecture, and open spaces within NAMA are a source of national pride and symbolize our cherished values and ideals, and they commemorate individuals and events that symbolize our freedom, justice, compassion, equality, service, healing, citizenship, civil rights, liberty, service, dedication, courage, sacrifice, innovations, unity, and diversity, as well as struggles of the international community for freedom and democracy. A visit to the park sites is a pilgrimage to find inspiration among the principal symbols of America's heritage.
- NAMA is the setting for national celebrations, parades, festivals, ceremonies, and rallies, as well as local and regional events.
- NAMA comprises a globally recognized platform to exercise democratic First Amendment rights.
- The individual states within the United States are represented in park elements ranging from street names and layout of the L'Enfant Plan and successor plans to African American personages, history, and events that have taken place or are commemorated here.

1.3.3 Relationship to Laws, Executive Orders, Policies, and Other Plans

The proposed action and the site upon which it would be constructed relate to a variety of laws, policies, and other plans. The purpose of this section is to describe the regulatory framework for the Eisenhower Memorial. The following section describes the Commemorative Works Act, the NPS Organic Act, NEPA, NHPA, the National Parks Omnibus Management Act, the Energy Independence and Security Act, the Migratory Bird Treaty Act, and the Architectural Barriers Act; Executive Orders 12898, 11593, 11988, 13112, and 13514; NPS Director's Orders 12 and 28; the *Extending the Legacy: Planning America's Capital for the 21st Century Plan*; the *Memorials and Museums Master Plan*, the *Comprehensive Plan for the National Capital*, *Federal Elements and District Elements*, the *Monumental Core Framework Plan*, the *Capital Space: Ideas to Achieve the Full Potential of Washington's Parks and Open Space*, the *National Mall Plan*, the Urban Design and Security Plan Objectives and Policies, and NCPC Donor Recognition Policies .

Commemorative Works Act

Most directly relevant to the project is the Commemorative Works Act, which addresses the location of memorials within the Washington, DC area. Based on the Commemorative Works Act of 1986 (amended in 2003), the standards preserve the integrity of the Monumental Core and encourage memorials to be located in all quadrants of the city. The standards provide direction for placing memorials on federal lands administered by NPS and GSA in the District of Columbia and its environs.

The Commemorative Works Act, as amended, establishes three memorial zones in the Washington, DC area: The Reserve, Area I, and Area II. The Mall is an area that has been declared as a substantially completed work of civic art, in which no new museums or memorials can be constructed (40 USC 8908 (c)). Since 1986, Area I has been and is now a sensitive area designated for commemorative works of pre-eminent historic and lasting national significance requiring Congressional approval. Area II includes the balance of the city and its surrounding environs. Of the Memorial site, the NPS parcel and the Maryland Avenue right-of-way are located within Area I. The GSA parcel is located within Area II (see Figure 1-2).

In considering site and design approvals, CFA and NCPC shall be guided but not limited by, the following criteria:

- Surroundings - To the maximum extent possible, a commemorative work shall be located in surroundings that are relevant to the subject of the work.
- Location - A commemorative work shall be located so that it does not interfere with, or encroach on, an existing commemorative work; and to the maximum extent practicable, it protects open space, existing public use, and cultural and natural resources.
- Material - A commemorative work shall be constructed of durable material suitable to the outdoor environment.
- Landscape features - Landscape features of commemorative works shall be compatible with the climate.
- Museums - No commemorative work primarily designed as a museum may be located on lands under the jurisdiction of the Secretary in Area I or in East Potomac Park as depicted on the map referenced in section 8902 (2).
- Site-specific guidelines - NCPC and CFA may develop such criteria or guidelines specific to each site that are mutually agreed upon to ensure that the design of the commemorative work carries out the purposes of this chapter.
- Donor contributions - Donor contributions to commemorative works shall not be acknowledged in any manner as part of the commemorative work or its site.

NPS Organic Act

Through the NPS Organic Act of 1916 (Organic Act), Congress has directed the U.S. Department of Interior and NPS to manage units “to conserve the scenery and the natural and historic objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by such a means as will leave them unimpaired for the enjoyment of future generations” (16 USC 1). Congress reiterated this mandate in the Redwood National Park Expansion Act of 1978 by stating that NPS must conduct its actions in a manner that will ensure no “derogation of the values and purposes for

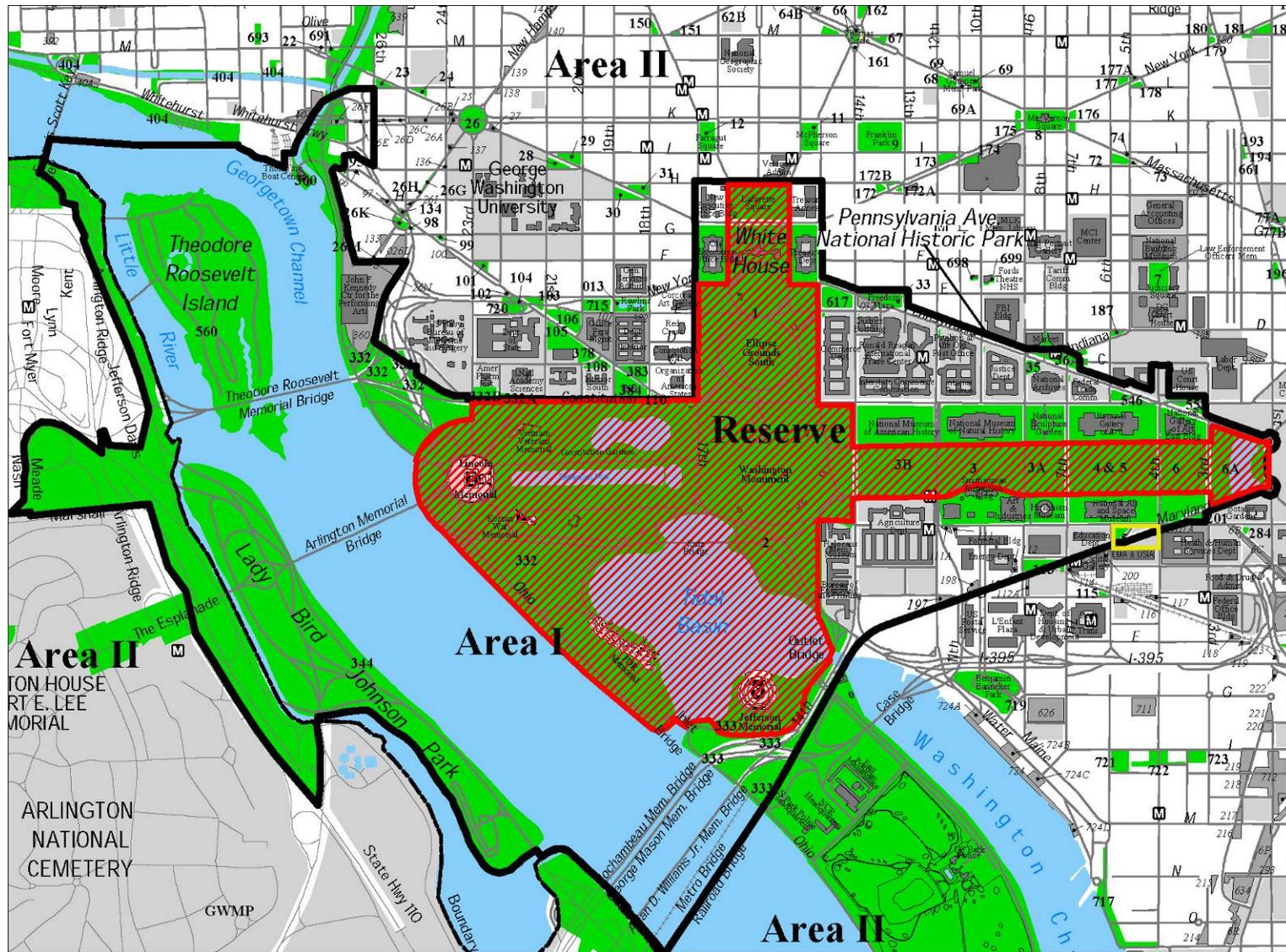


Figure 1-2: Commemorative Works Act Memorial Zones
Source: Public Law 108-126, Commemorative Works Clarification Act of 2003

which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress” (16 USC 1a-1). Despite these mandates, the Organic Act and its amendments afford the NPS latitude when making resource decisions that balance resource preservation and visitor recreation.

Because conservation is an important function of the agency, NPS seeks to avoid or to minimize adverse impacts on park resources and values. NPS has discretion to allow impacts on park resources and values when necessary and appropriate to fulfill the purposes of a park (NPS, 2006 sec. 1.4.3). While some actions and activities cause impacts, NPS cannot allow an adverse impact that would constitute impairment of the affected resources and values (NPS, 2006 sec. 1.4.3). The Organic Act prohibits actions that permanently impair park resources unless a law directly and specifically allows for the acts (16 USC 1a-1). An action constitutes an impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values” (NPS, 2006 sec. 1.4.5). To determine impairment, NPS must evaluate “the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts” (NPS, 2006 sec. 1.4.5).

Park units vary based on their enabling legislation, natural resources, cultural resources, and missions; management activities appropriate for each unit and for areas within each unit vary as well. An action appropriate in one unit could impair resources in another unit. This EA analyzes the context, duration, and intensity of impacts related to the development of a memorial to Dwight D.

Eisenhower, as well as the potential for resource impairment as required by the Organic Act and other regulations described below.

National Environmental Policy Act, 1969, as Amended

NEPA was passed by Congress in 1969 and took effect on January 1, 1970. This legislation established this country’s environmental policies, including the goal of achieving productive harmony between human beings and the physical environment for present and future generations. It provided the tools to implement these goals by requiring that every federal agency prepare an in-depth study of the impacts of “major federal actions having a significant effect on the environment” and alternatives to those actions. It required that each agency make that information an integral part of its decisions. NEPA also requires that agencies make a diligent effort to involve the interested and affected public before they make decisions affecting the environment.

NEPA is implemented through CEQ regulations (40 CFR 1500–1508) (CEQ 1978) and U.S. Department of Interior regulations (43 CFR Part 46). NPS has in turn adopted procedures to comply with the Act and the CEQ regulations, as found in Director’s Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making (NPS, 2006a), and its accompanying handbook. This EA complies with NEPA, NCP’s Environmental and Historic Preservation Practices and Procedures, and the procedures outlined in Director’s Order 12.

National Historic Preservation Act, as amended through 2000 (16 U.S.C. 470), including Section 106

NHPA of 1966, as amended through 2000, protects buildings, sites, districts, structures, and objects that have significant scientific, historic, or cultural value. The act established affirmative responsibilities of federal agencies to preserve historic and prehistoric resources. Section 106 of the NHPA directs federal agencies to take into account the effects of any undertaking on historic properties. "Historic property" is defined as any district, building, structure, site, or object that is eligible for listing in the National Register of Historic Places (NRHP). Section 106 also provides the Advisory Council on Historic Preservation (ACHP) and the state historic preservation officer (SHPO) an opportunity to comment on the assessment of effects that would result from the undertaking. Section 1.4 of this EA describes the Section 106 process that will continue throughout the design period for the Eisenhower Memorial.

National Parks Omnibus Management Act of 1998

The National Parks Omnibus Management Act (16 USC 5901 et seq.) underscores NEPA and is fundamental to NPS park management decisions. It provides direction for articulating and connecting resource management decisions to the analysis of impacts, using appropriate technical and scientific information. Both the National Parks Omnibus Management Act and NEPA also recognize that such data may not be readily available and provide options for resource impact analysis should this be the case.

The National Parks Omnibus Management Act directs the NPS to obtain scientific and technical information for analysis. The NPS

handbook for Director's Order 12 states that if "such information cannot be obtained due to excessive cost or technical impossibility, the proposed alternative for decision will be modified to eliminate the action causing the unknown or uncertain impact or other alternatives will be selected" (Management Policies, 2006; NPS, 2006 sec 4.4). This EA has been prepared consistent with the National Parks Omnibus Management Act, using appropriate technical and scientific information.

Energy Independence and Security Act of 2007

Enacted in 2007, the stated purpose of the Energy Independence and Security Act of 2007 (EISA) is "to move the United States toward greater energy independence and security, to increase the production of clean renewable fuels, to protect consumers, to increase the efficiency of products, buildings, and vehicles, to promote research on and deploy greenhouse gas capture and storage options, and to improve the energy performance of the Federal Government, and for other purposes." Under Section 438 of EISA, federal agencies are required to reduce stormwater runoff from federal development and redevelopment projects to pre-development levels in order to protect water resources. These stormwater requirements are addressed in this EA.

Architectural Barriers Act

Pursuant to the Architectural Barriers Act of 1968, all public buildings, structures, and facilities must comply with specific requirements related to architectural standards, policies, practices, and procedures that accommodate people with hearing, vision, or other disability and access requirements. NPS must comply with

the Architectural Barriers Act Accessibility Standards (ABAAS) for this project, as provided in the action alternatives.

Migratory Bird Treaty Act of 1918, as amended 1989

The original 1918 Migratory Bird Treaty Act implemented a 1916 treaty between the U.S. and Great Britain (for Canada) for the protection of migratory birds. Later amendments implemented treaties between the U.S. and Mexico, the U.S. and Japan, and the U.S. and the Soviet Union (now Russia). Specific provisions in the statute include a Federal prohibition to “pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention ...for the protection of migratory birds... or any part, nest, or egg of any such bird” (16 U.S.C. 703). These actions would be considered a take. This applies to birds included in international conventions between the U.S. and Great Britain, the U.S. and Mexico, the U.S. and Japan, and the U.S. and Russia.

The responsibilities of Federal agencies to protect migratory birds are set forth in Executive Order 13186. U.S. Fish and Wildlife Service (FWS) is the lead agency for migratory birds. The Directors of the NPS and the FWS signed a Memorandum of Understanding to Promote the Conservation of Migratory Birds (MOU) on April 12, 2010, in order to meet the requirements under Section 3 of Executive Order 13186 concerning the responsibilities of Federal agencies to protect migratory birds. The MOU specifies procedures that the superintendent of a NPS unit, or a designated

representative of the superintendent, will conduct prior to starting any activity that is likely to result in unintentional take. NPS will follow these procedures if it is determined that an action would result in take.

Executive Order 12898 – Minority Populations and Low-Income Populations

On February 11, 1994, President Clinton issued Executive Order 12898. This order directs agencies to address environmental and human health conditions in minority and low-income communities so as to avoid the disproportionate placement of any adverse effects from federal policies and actions on these populations. This EA complies with Executive Order 12898 by determining whether minority and low-income communities would be disproportionately adversely affected by the establishment of the Eisenhower Memorial.

Executive Order 11593 – Protection and Enhancement of the Cultural Environment

This Executive Order directs NPS to support the preservation of cultural properties and to identify and nominate to the National Register cultural properties within the park and to “exercise caution . . . to assure that any NPS-owned property that might qualify for nomination is not inadvertently transferred, sold, demolished, or substantially altered.” Section 106 consultations were undertaken for the Eisenhower Memorial to ensure that actions regarding cultural properties are consistent with Executive Order 11593.

Executive Order 11988: Floodplain Management

Executive Order 11988 requires federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities." This EA used these standards in its evaluation of floodplains in Section 1.6.1.

Executive Order 13112: Invasive Species

This Executive Order addresses the prevention of the introduction of invasive species and provides for their control and minimization of the economic, ecological, and human health impacts the invasive species causes. This EA evaluates invasive species in Section 4.7: Vegetation.

Executive Order 13514: Federal Leadership in Environmental, Energy, and Economic Performance

This Executive Order sets sustainability goals for federal agencies and focuses on making improvements in their environmental, energy and economic performance. It requires federal agencies to set a 2020 greenhouse gas emissions reduction target; increase energy efficiency; reduce fleet petroleum consumption; conserve water; reduce waste; support sustainable communities; and leverage federal purchasing power to promote environmentally

responsible products and technologies. This EA documents the Eisenhower Memorial's strategies to meet these goals.

Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision-making

Director's Order 12 (NPS, 2006a) and its accompanying handbook outlines policies and procedures by which NPS carries out NEPA and the NPS Organic Act. This order provides specific guidance on analysis standards required by legislation, and describes the roles and responsibilities for decision makers within NPS. It encourages the use of interdisciplinary approaches to decision making, establishment of benchmarks demonstrating best management practices, use of alternative dispute resolution, peer review panels, and analysis of impairment to resources as part of the environmental impact analysis process. As part of the development of this EA, NPS created an interdisciplinary science team. Comprised of members with technical expertise in the resources identified in this EA, the team reviewed analysis to ensure its quality. This EA was prepared in accordance with the instructions, guidance, and policies of Director's Order 12.

Director's Order 28: Cultural Resource Management

Director's Order 28 calls for NPS to protect and manage cultural resources in its custody through effective research, planning, and stewardship and in accordance with the policies and principles contained in the NPS Management Policies (NPS, 2006). This order also directs NPS to comply with the substantive and procedural requirements described in the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation*, the Secretary of the Interior's *Standards for the Treatment of Historic*

Properties with Guidelines for Treatment of Cultural Landscapes, and the Secretary of the Interior's *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*. Additionally, NPS will comply with the 2008 Programmatic Agreement (PA) among the NPS, ACHP, and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the NHPA. The accompanying handbook to this order addressed standards and requirements for research, planning, and stewardship of cultural resources as well as the management of archeological resources, cultural landscapes, historic and prehistoric structures, museum objects, and ethnographic resources. This EA was prepared in accordance with the standards described in Director's Order 28. Section 106 consultation regarding the Eisenhower Memorial described in this EA helps to ensure that actions will comply with Director's Order 28.

Legacy Plan

In 1997, NCPC released its vision plan for the nation's capital, *Extending the Legacy: Planning America's Capital for the 21st Century*. The Legacy Plan built upon the foundations of the L'Enfant and McMillan Plans and recommended dispersing new museums, memorials, and federal office buildings in all quadrants of the city. It established the importance of the U.S. Capitol as the center of the city and envisioned a reestablished Maryland Avenue that visually connected the U.S. Capitol to the Tidal Basin. Several subsequent studies were a direct outgrowth of the Legacy Plan, including the *Memorials and Museums Master Plan*, completed in 2001. The *Proposed Dwight D. Eisenhower Memorial Site Selection Environmental Assessment* included an analysis of the site's impacts on planning policies, including the Legacy Plan.

Memorials and Museums Master Plan

The *Memorials and Museums Master Plan*, prepared by NCPC and the Joint Memorial Task Force at the request of Congress "to guide the location and development of future Commemorative and cultural facilities in the District of Columbia and its environs," expands on some of the principles laid out in the Legacy Plan. Released in 2001, it also guided the development of the Commemorative Zone Policy, included in the 2003 amendments to the Commemorative Works Act, that established the Reserve and Areas I and II. The Memorials and Museums Master Plan establishes a framework for future memorials within the circles and squares of major avenues, at urban gateways and scenic overlooks, and along the Anacostia and Potomac Rivers. According to the *Memorials and Museums Master Plan*, new memorials should enhance the image and identity of their surroundings.

The site of the Eisenhower Memorial was identified as a prime candidate site (Site #3) for a commemorative work in the *Memorials and Museums Master Plan*. According to the *Memorials and Museums Master Plan*, a memorial on Site #3 should respect and reinforce the location's prominence as a civic plaza and incorporate existing vistas along Maryland Avenue. The mass and scale of the memorial should not obstruct or obscure the primary axial relationships along the Avenue and should not overshadow the LBJ Building, which houses the DED. In addition, the memorial should allow for public gathering while providing adequate space for commemorative reflection and take advantage of the existing transportation infrastructure. In addition, the *Memorials and Museums Master Plan* states "amenities such as parking and visitor services, i.e., restrooms, gift shops, and parking, should not be located at this site; nearby buildings should serve these uses. The site is not

appropriate for a building.” Subsequently, during the site selection process, the NPS FONSI for the site as a location for a landscaped memorial included provisions to allow for a small amount of building space to accommodate some on-site amenities.

The Proposed Dwight D. Eisenhower Memorial Site Selection Environmental Assessment included an analysis of the site’s impacts on planning policies, including the *Memorials and Museums Master Plan*.

Comprehensive Plan for the National Capital, Federal Elements

The Comprehensive Plan for the National Capital: Federal Elements (NCPC, 2004) is the principal planning document adopted by NCPC for the planning of federal facilities. The Comprehensive Plan contains goals, objectives, and planning policies for the growth and development of the Nation’s Capital. The Comprehensive Plan looks to the L’Enfant and McMillan Plans to preserve and enhance the image and identity of the national capital region. It also seeks to ensure that visitors have an enjoyable and educational experience and that regional planning goals are supported. The Proposed Dwight D. Eisenhower Memorial Site Selection Environmental Assessment included an analysis of the site’s impacts on planning policies, including the Comprehensive Plan: Federal Elements.

Comprehensive Plan for the National Capital, District Elements

The Comprehensive Plan for the National Capital: District Elements (DCOP, 2006) was prepared by the District of Columbia government and contain policies and maps that guide local government and private development in Washington, DC.

The Central Washington Area Element identified a number of goals for the area that includes the Eisenhower Memorial site. Among these goals were to have a “living downtown” and to integrate the “federal city,” or the federal buildings and structures, with the “domestic city,” or local community. Relevant policies in support of the goals include reinforcing the physical qualities that distinguish Central Washington from other major American cities, such as the L’Enfant framework of diagonal avenues and park reservations. Particularly relevant to the Eisenhower Memorial, the Central Washington Area Element recommends allowing Maryland and Virginia Avenues to be restored as connecting diagonal streets and important corridors that respect reciprocal views and pedestrian movement.

Monumental Core Framework Plan

The Monumental Core Framework Plan (NCPC, 2009) is a document that focuses on improving the setting of federal precincts that surround the National Mall in order to encourage future museum and memorial sponsors to locate in those areas and as a result relieve some of the development pressure from the National Mall. The stated goals of the *Monumental Core Framework Plan* are “to protect the National Mall from overuse; create distinctive settings for cultural facilities and commemorative works; improve connections between the National Mall, the city, and the waterfront; and transform the monumental core into a vibrant and sustainable place to visit, work, and live.”

The Monumental Core Framework Plan specifically addresses the area in which the Eisenhower Memorial would be located. The *Monumental Core Framework Plan* guidance includes:

- “The currently planned President Dwight D. Eisenhower Memorial will mark Maryland Avenue’s arrival at the Mall as a significant visitor destination” and improve the public realm of the corridor.
- Maryland Avenue should be restored as “a grand urban boulevard that links the U.S. Capitol to the Jefferson Memorial while enhancing mobility and environmental quality.” As part of this, a key action would be to tunnel the rail lines along Maryland Avenue in order to reclaim it as a complete and sustainable street and to divert vehicular traffic along a series of open spaces within the view corridor.
- Infill development should be encouraged along Maryland Avenue to strengthen the street wall to better frame views toward the U.S. Capitol and link the Jefferson Memorial.

Capital Space: Ideas to Achieve the Full Potential of Washington’s Parks and Open Space

The goal of the *Capital Space: Ideas to Achieve the Full Potential of Washington’s Parks and Open Space* (CapitalSpace) initiative is to address the growing, changing, and sometimes conflicting needs of residents, visitors, and workers regarding parks and open spaces. This document outlines six “big ideas” to accomplish this goal, including the enhancement of Center City parks. The Center City, as defined in CapitalSpace, is the dense urban area surrounding the National Mall and U.S. Capitol, which includes the site of the Eisenhower Memorial. One of the opportunities identified for Center City parks includes shaping “a greater understanding of the national

significance of the historical and cultural resources of the Center City parks, grand avenues and streets, and the statues and monuments within them.” Regarding the evaluation of the Memorial within this EA, relevant recommendations in support of the goal are:

- Identify and target capital improvements to repair and replace infrastructure and amenities, including quality landscaping, that will allow increased park usage.
- Consider the capacity of parks to function as neighborhood amenities when designing memorial and monument installations.
- Incorporate sustainable design features, low-impact development, and other greening techniques into new and existing parks and park improvements.
- Establish design guidelines that reinforce existing regulations promoting visual openness and continuity in the corridors between park spaces.
- Research and define historical significance, and build an understanding and appreciation of the park and neighborhood history through increased signage, promotions, programming, and other opportunities.

National Mall Plan

The National Mall Plan, completed by NPS in 2010, sets forth a vision for sustainable use, refurbishment, improvement, and maintenance of one of our nation's most iconic historic spaces, the National Mall. The plan provides for important uses, including commemoration, celebration, First Amendment demonstration and civic activities, as well as recreation, education, events, and relaxation. Acknowledging the National Mall as a complete work of civic art and as a source of national pride, the vision will protect memorials, views and other resources; improve the health and appearance of these areas; and provide quality facilities and experiences desired by the American people. The National Mall Plan's implementation would affect the Memorial, due to its proximity to the National Mall, through provision of visitor services and amenities.

Urban Design and Security Plan Objectives and Policies

Adopted in 2005, NCPC's *Urban Design and Security Plan Objectives and Policies* address urban planning and design issues while acknowledging the need for risk management strategies. The policies advise that security measures should be tailored to the setting and should include operational strategies, in addition to physical security measures. The policies call for allowing multi-modal transportation, such as maintaining open roadways and parking, to the extent possible. Physical perimeter security should be located and integrated into the building yard. If that is not possible, barriers should be integrated into the urban landscape.

NCPC Donor Recognition Policies

NCPC Donor Recognition Policies state that NCPC "will not approve donor or sponsor acknowledgements which intrude on the integrity of the particular project or its environs" (NCPC, 1988). Contributions from private donors shall not be visibly acknowledged anywhere at the memorial site, including memorial buildings and cultural buildings and facilities associated with a memorial. Acceptable ways of acknowledging sponsors include a buried time capsule, at dedication ceremonies, and tokens of appreciation given to donors that are suitable for display in their home or office.

1.4 SCOPING

NEPA Scoping Process

As part of the preparation of this EA, and building upon the site selection EA prepared in 2006, appropriate government agencies, public organizations, and interested citizens were contacted and informed about the project. Notices were placed in the *Washington Post* newspaper and NPS's Planning, Environment, and Public Comment (PEPC) website. The purpose of the communications was to solicit comments on the proposed improvements, identify potential environmental concerns, and obtain other relevant information. Scoping input was obtained from the following agencies and organizations:

- NPS
- GSA
- NCPC
- NCMAC

- CFA
- DDOT
- DEd
- DC State Historic Preservation Office (DC SHPO)

In addition, a public scoping meeting was held April 22, 2010 to convene the interested parties and generate further discussion of issues. NPS and EMC considered all scoping comments in the preparation of this EA. The comments are identified in Section 1.5: Issues and Impact Topics.

Historic Preservation Consultation (NHPA-related)

The National Mall and the L'Enfant Plan are listed as historic resources in the NRHP. Because this project is a federal undertaking, NPS and EMC are required to take into account potential adverse affects to historic properties. As a result, a review of the project's potential effects on historic resources is being undertaken consistent with Section 106 of NHPA. NPS and EMC informally began the Section 106 consultation process in February, 2010, and formally initiated the process in April, 2010. Consultation with the consulting parties has continued through the design process. The Section 106 consultation process is being carried out concurrently with the NEPA process

1.5 ISSUES AND IMPACT TOPICS

Several key issues were identified during the scoping process:

- *Scale.* Comments were received regarding the scale of the Eisenhower Memorial design concepts; some comments expressed that the proposed scale of Memorial elements would establish a sense of place for the Memorial in its urban context, while others were concerned that the scale would eclipse neighboring buildings.
- *Maryland Avenue roadway.* Comments stated that consideration should be given to restoring Maryland Avenue to its historic alignment with the U.S. Capitol. Conflicting comments were received regarding vehicular access at the site. In particular, some comments requested closing the roadway to vehicular traffic, while others wanted to maintain vehicular access through the site.
- *Maryland Avenue viewshed.* Comments reflected the desire to maintain the vistas and views through the Memorial to the U.S. Capitol. Additionally, comments advised that the viewshed should be physically defined within the Memorial. Also, comments suggested that the view corridor should be defined by the 160-foot right-of-way, which is the building line, rather than the 50-foot cartway, which is the roadway.

- *Promenade area.* Comments suggested that design concepts should clearly define the passage between the Memorial and the LBJ Building.
- *Landscape.* Comments stated that the landscape treatment (ground plane) should be considered as a background to Memorial elements, rather than a prominent feature.
- *Perimeter security.* Comments stated that the design concepts should consider the integration of perimeter security elements, if deemed necessary.
- *Maintenance.* Comments advised that the Memorial and its elements should be appropriate for a wide range of seasonal conditions.
- *Visual impacts on surrounding buildings.* Comments included that consideration should be given to the potential visual impact to surrounding buildings, particularly the LBJ Building.
- *Consistency with site selection design principles/pre-design program.* Comments noted that the design should be consistent with the design principles developed through the Section 106 consultation process at site selection and subsequently incorporated into NCP's site approval and FONSI. These design principles are listed in Section 1.3.
- *Open space.* Comments stated that the Memorial design should maintain the existing open space character of the site.
- *Commemoration of Eisenhower.* Among the comments received were questions regarding how Eisenhower should best be commemorated.
- *Parking.* Comments were received expressing concern for the reduction of on-street parking supply and removal of District parking meters and associated revenue.
- *Pedestrian circulation and access.* Comments stated that the safety of pedestrians accessing and circulating within the site should be ensured, particularly if Maryland Avenue is open to vehicular traffic.

1.6 IMPACT TOPICS ANALYZED IN THIS EA

A number of impact topics were identified for the Eisenhower Memorial through a variety of sources, including scoping for this EA; NPS knowledge of memorials in the national capital area; federal laws, regulations, and executive orders; and NPS management policies. The 2006 *Proposed Dwight D. Eisenhower Memorial Site Selection EA* also informed decisions about impact topics addressed in this EA. Many of the findings related to resource areas in the Site Selection EA would not be affected by the Memorial design, and are therefore dismissed from consideration in this EA. Other resource areas, such as visual resources, could be affected by the specific design of the Memorial, and are therefore revisited. The impact topics that have been determined to require a more detailed analysis of potential impacts as part of this EA are described below.

Cultural Resources

As specified in Chapter 5 of the NPS Management Policies 2006, the NPS is committed to identifying, documenting, and protecting cultural resources. NPS NEPA guidance requires the consideration of five types of cultural resources:

- **Cultural Landscapes:** A geographic area, including both cultural and natural resources and the wildlife and wildlife habitat or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.
- **Historic Structures or Districts:** Historic properties significant in the history of American architecture, culture, engineering, or politics at the national, state, or local level.

- **Archeology:** Material remains or physical evidence of past human life or activities of archeological interest.
- **Museum Collections:** Prehistoric and historic objects, artifacts, works of art, archival documents, and natural history specimens. Prevention of damage and minimization of potential for deterioration are NPS management goals.
- **Ethnography:** Cultural and natural features of a Park that are of notable significance to traditionally associated peoples, which include contemporary Park neighbors and ethnic or occupational communities that have been associated with a Park for at least two or more generations (40 years), and whose interests in the Park's resources began before the Park's establishment.

The project area contains and has the potential to impact historic structures or districts, archeology, and cultural landscapes. No museum collections or ethnographic resources would be impacted and have been dismissed from further analysis (see Section 1.6.1 for dismissal).

Before Washington, DC was established, the Tiber, Goose, and St. James creeks ran near the site. As a result, prehistoric use of the area is likely. Urban development grew out of the 1791 L'Enfant Plan, and continues to the present. The possibility of the preservation of prehistoric archeological site and features is possible, although urban development may have already impacted them. It is also possible that sub-surface features associated with the mid-19th to mid-20th century residential and commercial uses remain capped below fill across some of the project site. Therefore, the site has moderate potential for prehistoric resources and moderate to high potential for historical archeological resources.

The establishment of the Memorial could have potential impacts on the integrity of the 1791 L'Enfant Plan and its characterizing features, as well as historic resources within the Area of Potential Effect (APE), as defined in Section 3.1. The Eisenhower Memorial site is bordered and bisected by streets (4th and 6th Streets and Maryland Avenue) that originally appeared in the 1791 L'Enfant Plan for Washington. This plan is one of the best American examples of a comprehensive Baroque city plan, featuring strong visual axes, roadways, and views. The L'Enfant Plan is listed in the NRHP. Additionally, several buildings adjacent to the site are listed in the NRHP or are considered to be potentially eligible for listing. Therefore, historic resources are addressed as an impact topic in this EA.

The Eisenhower Memorial site also borders the Mall, which is an iconic cultural landscape. Contributing elements include views to building facades from the Mall, views up 4th Street, and the historic circulation of 4th Street. Union Square is also located near the Memorial site. Union Square, which connects the Mall to the U.S. Capitol Grounds, is also considered a cultural landscape. Among its contributing elements is the vista to the U.S. Botanical Garden.

Visual Resources

The establishment of a new memorial and realignment (or closure to vehicular traffic) of Maryland Avenue may result in changes to the visual character and the views and vistas of the site and adjacent areas. This includes the view along Maryland Avenue to the U.S. Capitol. The views to and from the north side of the LBJ Building may also be altered with respect to light, air, and workplace environment. The visual resources discussion in this EA will address the potential visual impacts of the Memorial on the use

and enjoyment of surrounding buildings, particularly the LBJ Building,

Park Operations and Management

Operation and management of the Eisenhower Memorial would be more intense than the current site use. Operation and management of the site would require more NPS resources than is currently required for the existing 0.5-acre NPS parcel. The Eisenhower Memorial would require a minimum of one park ranger on-site during hours of operation. Additionally, the Memorial maintenance would require more intense management due to increased visitation and use and the change in the nature of the facility. Therefore, this resource area is addressed as an impact topic in this EA.

Soils

Activities associated with the construction of the Memorial would disturb approximately four acres, which may result in the loss of soil productivity and increase the potential for soil erosion and loss of topsoil. As a result, soil resources are addressed as an impact topic in this EA.

Transportation

The Eisenhower Memorial would represent a change to the existing roadway alignment of Maryland Avenue and new configurations for its intersections with Independence Avenue, 6th Street, and 4th Street. Construction of the Memorial may temporarily disrupt local traffic and pedestrian flow. In addition, parking spaces within and

adjacent to the Memorial site may be removed. Therefore, transportation is analyzed as an impact topic in this EA.

Vegetation

Existing vegetation on the Eisenhower Memorial site consists of landscaped grasses, shrubbery, trees, and permitted community gardens. During construction of the Memorial, almost all of the vegetation would be removed, but some street trees would be protected. Although the Eisenhower Memorial would install new plant materials, vegetation is considered as an impact topic for this EA.

Visitor Use and Experience

In its current condition, the Memorial site does not receive a significant amount of visitors, with the exception of workers from nearby government offices using the plaza during breaks, and occasional DEd events. There are 38 community garden plots cultivated by gardeners on the NPS parcel, as well as an exercise circuit used by members of the public. Pedestrian traffic patterns follow sidewalks along adjacent roadways. The Eisenhower Memorial would increase visitor use at the site over current levels, modify pedestrian traffic patterns, and alter the essential purpose of the site. Therefore, visitor use and experience is considered as an impact topic.

Water Resources

Currently, impervious surfaces cover the majority of the site, which minimizes the amount of stormwater absorbed within the site. While the Eisenhower Memorial would likely alter the ratio of

paved and impervious surfaces, stormwater affects both the quantity and quality of area water resources. Therefore, water resources are addressed as an impact topic in this EA.

1.6.1 Impact Topics Dismissed from Further Analysis

The following topics were eliminated from further analysis in this EA. With mitigation, the potential impacts on these resources, to the extent they would occur, would be negligible or localized.

Air Quality

The 1963 Clean Air Act and the 1970 and 1990 Clean Air Act Amendments require public land managers, including NPS Park Superintendents, to protect air quality in national parks. The U.S. Environmental Protection Agency (EPA) has issued National Ambient Air Quality Standards for six criteria pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), particulate matter with a diameter less than or equal to 10 micrometers (PM₁₀) and particulate matter with a diameter less than or equal to 2.5 micrometers (PM_{2.5}), lead (Pb), and sulfur dioxide (SO₂). Areas across the country are monitored for their criteria pollutant level. Air-quality Control Regions are monitored for their attainment or non-attainment of the standards. Air-quality Control Regions that exceed the allowable criteria pollutant level are designated as a “non-attainment” area; there are different levels of severity of nonattainment from marginal, moderate, serious, severe or extreme. The Washington, DC area is in moderate nonattainment for the criteria pollutant O₃, and nonattainment for PM_{2.5}; the area is in attainment for all other criteria pollutants.

This topic was addressed as part of the *Proposed Dwight D. Eisenhower Memorial Site Selection EA* (NPS and EMC, 2006). Should the proposed action be selected and implemented, short-term, construction-related impacts on air quality could occur as a result of the following:

- Construction emissions from soil excavation and construction equipment/installation of Memorial features and from trucks hauling construction materials to the site and excavated soil and broken pavement from the site;
- Vehicle emissions from construction worker vehicles driven to and from the site; and
- Fugitive dust from soil excavation and site disturbance.

Hydrocarbons, nitrogen oxide, and sulfur dioxide emissions would dissipate quickly. At times, fugitive dust would increase airborne particulates in the area of the project site.

Due to the limited potential grading area; the limited duration of construction equipment use; and the few vehicle trips that would be generated by the Memorial's operation, the project-generated emissions for O₃ and PM_{2.5} would be below minimum pollutant thresholds and would not change regional air quality. Best management practices related to vehicle and equipment emissions, such as the use of electric power sources for construction equipment, rather than portable fuel-combustion generators, would further reduce construction emissions. Therefore, this impact topic was dismissed from further analysis.

Ethnographic Resources

Ethnographic resources are defined by NPS as any "site, structure, object, landscape, or natural resource feature assigned traditional, legendary, religious, subsistence or other significance in the cultural system of a group traditionally associated with it" (NPS, 1998). In this analysis, the NPS' term "ethnographic resource" is equivalent to the term Traditional Cultural Property (TCP). As defined by NPS's National Register Bulletin, *Guidelines for Evaluating and Documenting Traditional Cultural Properties*, a TCP is the "association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community." There are no properties that meet the definition of a TCP within the APE. Therefore, this impact topic has been dismissed from further consideration.

Museum Collections

The Eisenhower Memorial would not have any effects upon recognized museum collections (historic artifacts, natural specimens, and archival and manuscript material). Therefore, this impact topic was dismissed from further analysis.

Environmental Justice

Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing the disproportionately high and/or adverse human health or environmental effects of the programs and policies on minorities

and low-income populations and communities. According to the EPA, environmental justice is

“...fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations and policies. Fair treatment means that no group of people, including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.”

There are no minority or low-income populations present near the Eisenhower Memorial site. Therefore, this impact topic was dismissed from further analysis.

Floodplains

A portion of the Eisenhower Memorial site is located within the 500-year floodplain boundary of the Potomac River, as determined by the U.S. Federal Emergency Management Agency (FIRM Map 1100010019C). The 500-year floodplain is defined as any land that would be inundated by a flood having a 0.2% chance of occurring in any given year. Existing conditions at the site include no values, or ecosystems, for floodplains.

FEMA recently adopted new floodplain maps based on existing Potomac River levee protection. Construction of a closure system for the levee is underway, with committed funding and developed plans. It is anticipated that the levee construction would be

completed before the Eisenhower construction would begin. Director’s Order 77-2: Floodplain Management is NPS’s floodplain management guidance required by Executive Order 11988: Floodplain Management. Director’s Order 77-2 identifies three classes of actions based on the use and location of the proposed action: Class I addresses facilities in the 100-year floodplain, Class II addresses critical facilities in the 500-year floodplain, and Class III addresses facilities in High Hazard Areas.

Because the Memorial is outside the 100-year floodplain, does not include critical actions, and the site would not be in the 500-year floodplain at the time of construction, NPS would not require a statement of findings for this project, consistent with Director’s Order 77-2, Floodplain Management. Therefore, this topic area was dismissed as an impact topic.

Human Health and Safety

Because the Eisenhower Memorial would be surrounded by roads, the potential threats to human health and safety include pedestrian safety, security, access to emergency responders, and any hazardous materials currently located at the site. The site is considered a relatively low-priority target for terrorism. Additionally, the LBJ Promenade would form a minimum 50-foot buffer between the Eisenhower Memorial and the LBJ Building, to maintain a security stand-off area. The LBJ Promenade would provide an emergency evacuation route for the LBJ Building and provide access for emergency responders (but not vehicles). GSA has reviewed the site and has determined that adequate emergency response access to the LBJ Building can be obtained via 4th and 6th Streets; the remaining three sides of the building would have full fire

department access (Dafin, 2006). The issue of pedestrian safety is addressed under the impact topic of visitor use and experience.

Construction of the Eisenhower Memorial would disturb existing petroleum-contaminated soils found at the site. Any disturbance would be a result of construction activities. Mitigation measures would include the removal and treatment of any waste or materials found and the wearing of protective gear by those who would potentially come into contact with such materials in accordance with an approved safety plan. Such materials would not pose health risks to the general public through best management practices and due to their location underground, posing little opportunity for contact with the general public.

At the site, an exhaust duct is located at the existing plaza and would be relocated to the LBJ Promenade. The exhaust source is the LBJ Building electrical and mechanical room, which would not be hazardous or have temperature differential such that a pedestrian would be burned. Therefore, human health and safety was dismissed from further consideration as an impact topic.

Land Use

Land use is often divided into categories depending upon the types of activities for which the land is used, such as industrial, retail, open space, etc. In the case of the Eisenhower Memorial, the existing land use is open space, which hosts a community garden and exercise space and the LBJ Building's plaza. The Eisenhower Memorial would continue use of the site as open space, providing park-like setting with less hardscape and more plants and trees. The use of the site as a Memorial was addressed in the Site Selection EA. Impacts of the Memorial designs on other buildings in relation

to light, air, and workplace environment are addressed in Section 4.2.1: Visual Resources. Impacts to the existing community garden and exercise course are addressed in Section 4.8: Visitor Use and Experience.

Socioeconomics

Socioeconomics was addressed as part of the *Proposed Dwight D. Eisenhower Memorial Site Selection EA* (NPS and EMC, 2006) and it was determined that the Eisenhower Memorial would not appreciably affect either local and regional land use or local businesses or other agencies. Implementation of the Eisenhower Memorial could provide beneficial impacts on the local economy. These beneficial impacts would be temporary or minimal in nature and would result from minimal increases in employment opportunities from the construction of the site and increased retail activity from visitors. It was also determined that the removal of metered parking at the site would not significantly impact local government revenue. Therefore, socioeconomic resources were dismissed as an impact topic.

Threatened, Endangered, Rare, and Special Concern Species

There are no rare, threatened, or endangered species or habitat known or expected to occur in the project area. Therefore, this impact topic was dismissed from consideration.

Unique Ecosystems, Biospheres Reserves, or World Heritage Sites

There are no known biosphere reserves, World Heritage sites, or unique ecosystems listed at the Eisenhower Memorial site. Therefore, this impact topic was dismissed from further analysis.

Utilities and Infrastructure

Utilities and infrastructure was addressed as part of the *Proposed Dwight D. Eisenhower Memorial Site Selection EA* (NPS and EMC, 2006). Because the Eisenhower Memorial would largely be an outdoor area for quiet reflection, it would generate minimal additional demands on sanitary sewer systems, water supply systems, and energy systems. Stormwater management at the site would be altered in order to comply with appropriate requirements as part of the Memorial development; the stormwater management actions are addressed in Section 4.8: Water Resources. In addition, implementation of one the action alternatives would likely require re-routing certain utilities. It is anticipated however, that no breaks in services would occur. Therefore, utilities were dismissed from further analysis as an impact topic.

Wildlife or Wildlife Habitat

The NPS Organic Act of 1916, NPS Management Policies 2006 (NPS 2006), and NPS Reference Manual 77: Natural Resource Management (NPS 1991) direct NPS managers to provide for the protection of park resources. The Organic Act requires that wildlife be conserved unimpaired for future generations, which has been interpreted to mean that native animal life are to be protected and perpetuated as part of a park unit's natural ecosystem. Parks rely on natural processes to control populations of native species to the greatest extent possible; otherwise, they are protected from harvest, harassment, or harm by human activities. The NPS Management Policies 2006 make restoration of native species a high priority. Management goals for wildlife include maintaining components and processes of naturally evolving park ecosystems, including natural abundance, diversity, and ecological integrity of plants and animals

(NPS 2006, sec. 4.1). Policies in the NPS Natural Resource Management Guideline state, "the National Park Service would seek to perpetuate the native animal life as part of the natural ecosystem of parks" and that "native animal populations would be protected against . . . destruction . . . or harm through human actions."

The Eisenhower Memorial site is located in a highly urban setting, with concrete plazas, roadways, decorative trees, a limited amount of lawn, and community gardens. The area has a high amount of attendant human activity and is surrounded by heavily used roads. The existing wildlife community on-site likely includes common urban species of small mammals and birds, such as gray squirrels (*Sciurus carolinensus*) and Norway rats (*Rattus norvegicus*). Birds common to the area and that have adapted to urban areas include house sparrows (*Passer domesticus*), pigeons (*Columba livia*), house finches (*Carpodacus mexicanus*), gray catbird (*Dumetella carolinensis*), mallard (*Anas platyrhynchos*), and starlings (*Sturnis vulgaris*). Other songbird species such as blue jays (*Cyanocitta cristata*) and mockingbirds (*Mimus polyglottis*) that nest in nearby parks may utilize the study area. Neotropical migratory songbirds may also pass through during spring and fall migration. The most common hawks and falcons would be Sharp-shinned hawks (*Accipiter striatus*), Cooper's Hawks (*Accipiter cooperi*), Kestrels (*Falco sparverius*), Merlins (*Falco columbarius*) and possibly Peregrine falcons (*Falco peregrinus*).

Construction activities and vegetation removal would repel birds and other wildlife from the site. As construction activity ceases and new, native vegetation is established, the site would become more attractive for birds. While there has not been any research on how birds would perceive the tapestries, Dr. Daniel Klem, a professor of ornithology who has done extensive research on bird strikes and

windows, stated that depictions that appear real to the human eye also appear real to birds. The semi-transparent background and rural Kansas landscapes may confuse birds and attract them towards the tapestries. However, he also went on to state that he expected the tapestries to be bird safe because of their non-reflective or minimally reflective appearance (D. Klem, personal communication, September 6, 2011).

The USFWS was also informally consulted on this issue and stated that as the new vegetation at the site becomes more established, it would likely attract more songbirds to the area, which could increase the chance of the occasionally bird strike with the tapestries. It was also stated that raptors could collide with the tapestries during their pursuit of songbirds as prey items (C. Koppie, personal communication, September 6, 2011).

While the NPS acknowledges there may be an occasional bird strike, it is expected that the overall impacts on native bird species would be minor or less (it would not likely be detectable). Furthermore, changes to population numbers, population structure, or other demographic factors would not likely occur. To ensure this assumption, Park staff working at the site would be instructed document every bird strike occurrence and report the findings to the park's natural resource specialist. If, through this reporting, it is determined the incidence of bird strikes is increasing to a point where they are occurring regularly, the NPS would work with the USFWS to determine the best mitigations to decrease these occurrences. The NPS and the USFWS signed an MOU in July 2010 to promote the conservation of migratory birds. Both parties pledged to work together to

develop conservation measures consistent with the Executive Order outlining the responsibilities of federal agencies to protect migratory birds (Executive Order 13186, 2001). One example of a mitigation could include the application of ultraviolet light (UV) reflectants that is visible to birds placed in a natural and unobtrusive manner within the tapestries. Due to the area's urban context, level of human activity, minimal habitat value, and negligible to minor adverse impacts to the area's wildlife and bird populations, this topic was dismissed from detailed analysis.

1.7 IMPAIRMENT

According to *NPS Management Policies 2006*, an action constitutes an impairment when an impact "would harm the integrity of park resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values" (NPS 2006, sec. 1.4.5). Whether an impact meets this definition depends on the particular resources and values that would be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute an impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to the opportunity for enjoyment of the park; or

- identified as a goal in the park's general management plan or other relevant NPS planning documents

Impairment findings are not necessary for visitor experience and park operations because impairment findings are related to park resources and values, and visitor experience and park operations are not generally considered to be park resources or values according to the NPS Organic Act, and cannot be impaired the same way that an action can impair park resources and values. A draft impairment determination for the NPS preferred alternative is provided in Appendix A of this document. Park resources considered in this determination include cultural resources, visual resources, soils, vegetation, and water. A final impairment determination would be provided in the decision document developed on the findings of this EA.

2.0 ALTERNATIVES

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2.1 INTRODUCTION

The proposed action is the design, construction, and operation of the Eisenhower Memorial on land located immediately south of Independence Avenue between 4th and 6th Streets and the LBJ Building, headquarters of Department of Education. This EA evaluates a range of alternatives related to the proposed memorial to President Eisenhower, including: three action alternatives, which were refined during the public scoping and consultation processes, and a No Action Alternative. The three action alternatives present varying approaches to the Eisenhower Memorial design, including the possibility of maintaining Maryland Avenue open to vehicular traffic. This section describes the alternative designs for the Eisenhower Memorial; defines the No Action Alternative; identifies a preferred alternative; and summarizes the environmental impacts and mitigation measures for each alternative.

2.2 DESCRIPTION OF ALTERNATIVES

2.2.1 No Action Alternative

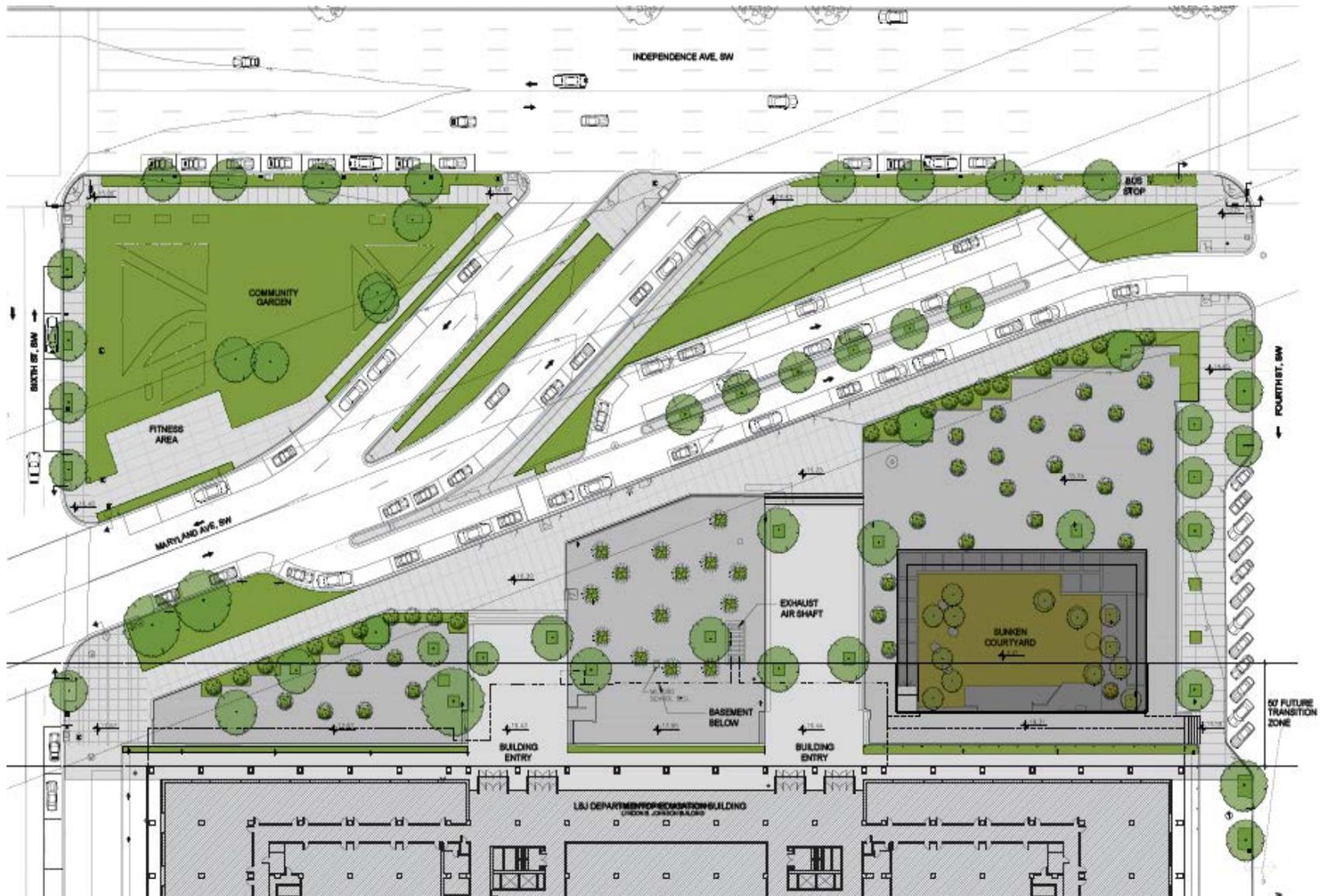
As part of the environmental review process, the consequences of a No Action Alternative are considered. Under the No Action Alternative, all existing site features would remain in their current condition and use. This would include transportation patterns, visitor use, management of the site, and existing vegetation. Figure 2-1 on the following page shows the existing site configuration.

Under the No Action Alternative, the current administrative jurisdiction held by three separate agencies would continue and no land would be transferred. GSA would continue to manage the plaza area that complements the LBJ Building. Benches and temporary

tables would remain at the site, providing seating to visitors, most of which are nearby office workers on break. The sunken courtyard would continue to be accessed through the LBJ Building basement and prohibit access from the plaza. Existing trees and plantings within the plaza would remain. The former school bell and two plaques currently located within the plaza would also remain.

NPS would continue its current management practices of maintaining its area. The 38 community gardens plots would continue to be in use by gardeners, who would continue to visit the site regularly. The existing donated exercise circuit located at the site, made up primarily of bars and benches (relocated here in advance of the American Indian Museum), would remain for visitors to the site.

DDOT would continue to maintain the current Maryland Avenue roadway within the site under the No Action Alternative. There would be no reconfiguration of the site and the existing roadway and parking configuration would be maintained. Vehicles would continue to enter Maryland Avenue at 6th Street and mid-block at Independence Avenue. Vehicles would continue to exit Maryland Avenue at 4th and 6th Streets and diagonally at Independence Avenue. Parking would continue along Maryland Avenue and its associated spur. DDOT would continue to maintain the sidewalks and vegetated areas along the roadway. DDOT would continue to collect parking revenue from meters at the site.



Source: Gehry Partners, 2010

Figure 2-1: Existing site configuration

2.2.2 Elements Common to All Action Alternatives

Each of the action alternatives would establish and operate a memorial dedicated to President Dwight D. Eisenhower on the approved site. Although many design elements are common to the action alternatives, the exact placement and quantity of the elements would vary among the alternatives. The alternatives are comparatively illustrated in Figure 2-2.

Memorial Design

The following quote summarizes the design approach of the Memorial architect, Gehry Partners:

“The underlying premise in the proposals is representing a president widely viewed as modest in character but defined by great and vast accomplishments. President Eisenhower was as a leader who put himself in the middle of the people. By viewing himself in the context of his countrymen, he became an ideal leader for a democratic society at a time in history when the United States was projected to the forefront of a world stage and leadership role. President Eisenhower always considered himself in relation to the accomplishments of those who served with him. Ike’s consciousness of the world as an interrelated community made him a spokesman for peace in his later life. He was truly a citizen of the world.”

- Gehry Partners, 2011

The overall site design of the Memorial focuses on a central element supported by a series of stone reliefs to narrate the story of President Eisenhower and his accomplishments. Large trees would be installed to represent the strength and modesty of President

Eisenhower. The reliefs would be carved on blocks of stone. Two action alternatives would contain lintels over the blocks that would be made of similar materials. For two of the action alternatives, varying numbers of cylindrical columns would help define the Memorial core; for the third action alternative, the columns would help define the whole site within the larger context of the city. The column size would vary between alternatives, ranging from 65 feet (Alternative 1) to 50 feet (Alternative 2) to an average of 78 feet (Alternative 3) in height; the columns in Alternative 1 are 65 feet in height. For Alternative 1, the columns would be 12 feet in diameter. Columns in Alternative 2 would be ten feet in diameter. For Alternative 3, the columns would be eleven feet in diameter. Water features designed to soften the site and mute the urban and traffic noise would be located in front of select reliefs or other features in Alternatives 1 and 2.

A number of amenities to provide minimal visitor services would be installed in each of the action alternatives. A small building with a ranger contact station, toilet facilities, and book sales area would be located on the site. The total amount of at-grade indoor space is 2,500 square feet for Alternatives 1 and 2, and 2,100 square feet for Alternative 3. Covered areas for groups (canopy elements) are envisioned around various areas of the site. These are intended to be gathering areas in inclement weather.

The Memorial site would be a mix of hardscape and green space with a number of trees and several ground cover areas. Trees suitable for the Washington, DC climate would be placed throughout the site. Additionally, street trees along Independence Avenue and 4th and 6th Streets would be coordinated with those on neighboring parcels, respecting the existing streetscape aesthetic. Grassy spaces



No Action Alternative



Alternative 2: Maryland Promenade



Alternative 1: Maryland Roadway



Alternative 3: Maryland Park

Figure 2-2: Side-by-side comparisons of all alternatives

would range from defined portions of the site to more expansive arrangements. Walkways and sidewalks would consist of a variety of surfaces. The stormwater would be collected and reused for on-site landscape irrigation and/or for toilet flushing.

Memorial Thematics

The underlying premise in the alternatives is to represent a leader widely viewed as modest in character but whose accomplishments were great. As a result, three themes would be presented throughout the Memorial:

- Eisenhower’s personal journey, which begins with his youth in Abilene, Kansas, was fundamentally shaped by the values and understanding of the world as seen through an American heartland lens;
- Eisenhower as General, and his achievements in reaching the supreme position of the U.S. military during World War II; and
- Eisenhower as two-term President of the United States, and his continued role as valuable world citizen.

Relief blocks, the central grove and landscape, possible sculptural figures, and, in the case of Alternative 3, stainless-steel tapestries (described in the summary of Alternative 3), would articulate these themes.

The site itself would reflect the landscape of Abilene, Kansas, which is both Eisenhower’s hometown and the geographical center of the United States. This reflection would be accomplished through the use of plant materials, design, and, in the case of Alternative 3, the use of tapestries. The Memorial would establish a contemplative

park of trees and plantings intended to provide a calm, autonomous, and picturesque experience, framing the context of Eisenhower’s early life and values.

Quotations and archival images would serve as a base for the treatment of the Memorial elements, such as inclusion in the tapestries or inspiration for relief blocks. Several photographs that represent potential images under consideration are shown in Figure 2-3.

In addition to text from his Guildhall Address, Chance for Peace speech, and Farewell address, the following quotes by President Eisenhower represent potential text under consideration for the Memorial:

- “I come from the very heart of America.”
Guildhall Address, London, England, June 12, 1945
- “Because no man is really a man who has left out of himself all the boy, I wanted to speak first of the dreams of a barefoot boy... Always in his dreams is the day when he finally comes home to a welcome from his hometown. Because today that dream of forty-five years ago has been realized beyond the wildest stretches of my own imagination, I came here to thank you and to say that the proudest thing I can claim is that I’m from Abilene....”
Homecoming speech, Abilene, Kansas June 22, 1945
- “The American tradition is to finish whatever we start, however hard the road.”
Material for NBC Address, June 4, 1946

- “Whatever America hopes to bring to pass in the world must first come to pass in the heart of America.”
Inaugural Address, January 20th, 1953



Figure 2-3: Photos representing those under consideration for the Eisenhower Memorial

- “I have found out in later years that we were very poor, but the glory of America is that we didn’t know it then.”
Speech made at the cornerstone laying of the Eisenhower Foundation, Abilene, Kansas, June 4, 1952
- “The spirit of our people is the strength of our nation.”
Address to a Meeting Sponsored by the Republican National Committee, April 17, 1956
- “Peace, like all virtues, begins at home.”
Radio and Television Address, September 19, 1956
- “There can be no enduring peace for any nation while other nations suffer privation, oppression, and a sense of injustice and despair.”
Nomination Acceptance Speech, August 23, 1956
- “We must be ready to dare all for our country. For history does not long entrust the care of freedom to the weak or the timid.”
Inaugural Address, January 20, 1953
- “A people that values its privileges above its principles soon loses both.”
Inaugural Address, January 20th, 1953
- “May we be ever unswerving in devotion to principle, confident but humble with power, diligent in pursuit of the Nation’s great goals.”
Farewell Address, January 17, 1961

Land Transfer

While the entire site is owned by the federal government, administrative jurisdiction is held by three separate entities: NPS, GSA, and the District of Columbia Department of Transportation (DDOT). NPS administers the northwest corner of the site, which currently contains permitted community gardens and a donated

exercise course. GSA administers the plaza in front of the LBJ Building, in addition to the building itself. Finally, DDOT holds administrative jurisdiction over the Maryland Avenue portion of the site including the roadway, parking areas, and the median.

Each of the action alternatives would require that DDOT initially transfer some, if not all, of its portion of the site to NPS, depending upon the alternative. The existing street space covers Maryland Avenue, its spur road, and median area at the site. While one of the alternatives would maintain vehicular access on Maryland Avenue through the site, not all of the street space would be necessary. For the other two action alternatives, the entire street space would be transferred to NPS. DDOT would also transfer the care and maintenance of the Memorial site's sidewalks to NPS.

GSA would transfer the site area located north of the LBJ Building to NPS for construction and operation of the Eisenhower Memorial. However, GSA would retain responsibility for the LBJ Building and the adjacent Promenade. Sidewalks on 4th and 6th Streets adjacent to the Promenade would continue to be maintained by DDOT. The land transfers from DDOT would be subject to review and approval by NCPC.

The Memorial would be operated by NPS once construction is completed. NPS operations would include staffing the ranger contact station, managing the landscape and facilities maintenance, providing stewardship and preservation of Memorial features, and any other potential services. NPS would use a cooperating association to operate and manage the bookstore on-site.

Sunken Courtyard

The existing sunken courtyard at the southeast corner of the site would remain, although it would be altered. The courtyard provides a below-grade exit from the LBJ Building, and provides natural light to a portion of the Building's basement level. While currently a poorly maintained area, the courtyard has several trees and planters. The air intake currently located in the courtyard would remain. Access is provided via the LBJ Building basement. Stairs connecting the courtyard to the plaza above are currently cordoned off and serve as emergency exit only.

In each of the action alternatives, the courtyard would be reduced in size. A narrower courtyard would continue to offer light into the basement library of the LBJ Building. Stairs from the courtyard would connect to the ground level, maintaining the existing point of egress in case of emergency. The courtyard would be refinished to redefine a new usable space for DEd use. This space would not be accessible to the general public from the Memorial.

LBJ Promenade

Each of the action alternatives would feature a minimum 50-foot wide space along the southern end of the Memorial site, between the LBJ Building and the landscaped Eisenhower Memorial. This area, referred to as the LBJ Promenade, would serve to transition between the contemplative setting of the Memorial and the office building. It would also help establish the Eisenhower Memorial site as a traditional urban square, bounded by four roads (although this element would be pedestrian-only), in keeping with the L'Enfant and McMillan Plans. The eastern portion of the LBJ Promenade would be elevated approximately four feet above the sidewalk and

street level; stairs and a ramp entry would be installed to provide access to the LBJ Promenade. In Alternatives 2 and 3, the Memorial itself would be lower than the LBJ Promenade, and stairs would connect the two spaces near the center of the LBJ Promenade.

The LBJ Promenade would include a mix of paved materials, landscaping, and visitor amenities. Portions of the basement of the LBJ Building extend beyond the north façade of the building by approximately 27 feet, limiting construction and landscaping possibilities in this zone.

Perimeter Security

Perimeter security features for the north side of the LBJ Building would be incorporated into the design. The LBJ Promenade provides a 50-foot setback as needed for security. The western point of access to the promenade would have small pillars to serve as physical barriers to prohibit vehicular access. From the Memorial itself, access to the LBJ Promenade and Building would be limited by Memorial elements and the sunken courtyard.

Alignment of Maryland Avenue

In each of the action alternatives, the alignment of Maryland Avenue between 4th and 6th Streets would change. Currently, Maryland Avenue west of the site is directly in line with the U.S. Capitol. Within the site, the roadway curves north to intersect mid-block with Independence Avenue. As part of the alternatives, the alignment of Maryland Avenue would return to its historic L'Enfant orientation with the U.S. Capitol. The principal variation between the action alternatives is whether Maryland Avenue remains open to vehicular traffic along the new alignment. These variations are

discussed in the in their respective descriptions for the action alternatives.

Community Gardens and Exercise Equipment

In each of the action alternatives, the permitted community garden and exercise equipment would be removed. The creation of a presidential memorial at the site would preclude these uses. Providing gardening opportunities in the District of Columbia is not a responsibility of the NPS but has historically been permitted at this site.

Parking and Bus Access

In each of the action alternatives, existing parking on-site along Maryland Avenue and its spur would be removed. A bus pull-off, large enough to accommodate two buses, would be provided on the eastern edge of the Memorial, off of 4th Street.

2.2.3 Alternative 1: Maryland Roadway

Alternative 1 would realign Maryland Avenue to its historic location and 50-foot roadway width (also referred to as the cartway width). Because vehicular traffic would bisect the site, Alternative 1 would have relief blocks on either side of Maryland Avenue with a Memorial grove placed south of the roadway. Overall, the landscape design is an urban civic park with hard pathways and a grid pattern of trees. This alternative is illustrated in Figures 2-4 through 2-7.

The columns and central grove of trees would be situated so that Maryland Avenue could pass through them. A differentiation in surface material would distinguish the central Memorial area around the grove. This would extend to the Maryland Avenue roadway, where the segment within the central Memorial would have pavement materials similar to the grove. The colonnade, made up of columns 12 feet in diameter and 65 feet high, would serve to formally unify the two sides of the street and distinguish the central Memorial core from the larger site.

Two relief blocks with lintels would be found north of Maryland Avenue, while the other relief components and the Memorial grove would be located south of the roadway. Included in the elements south of Maryland Avenue would be three Memorial relief blocks, lintels, and the grove of trees. Facing the central Memorial area, each relief block would incorporate a water feature. The visitor service facilities would be located south of Maryland Avenue. The ranger contact station, book store, and restroom would be incorporated at the rear of two relief blocks. A canopy is envisioned for gatherings in inclement weather in the central Memorial core.

Beyond the central Memorial area, trees would populate the Memorial, providing an urban park experience. Although some areas in the northwestern and eastern portions of the site would be dominated by vegetation, because of the roadway, the ground surface of the Eisenhower Memorial would have paved areas. The site could be accessed at most points from the sidewalk, the LBJ Promenade, and from Maryland Avenue. Large tree wells within the paved areas would contain shade canopy trees and landscape ground cover. Seating areas would surround many of the tree wells.

Vehicular access to 6th Street from Maryland Avenue would remain at the southwest corner of the site, but the access to Independence Avenue from Maryland Avenue would be located near the northeast corner of the site, rather than the current mid-block intersection. The Maryland Avenue spur access point to 4th Street would be removed. In the area where Maryland Avenue becomes part of the central Memorial area, a speed table or raised roadway at the plaza level would minimize pedestrian safety concerns. A mid-block crossing would also be installed. The exact location of the crossing would be established during a subsequent phase of the design.

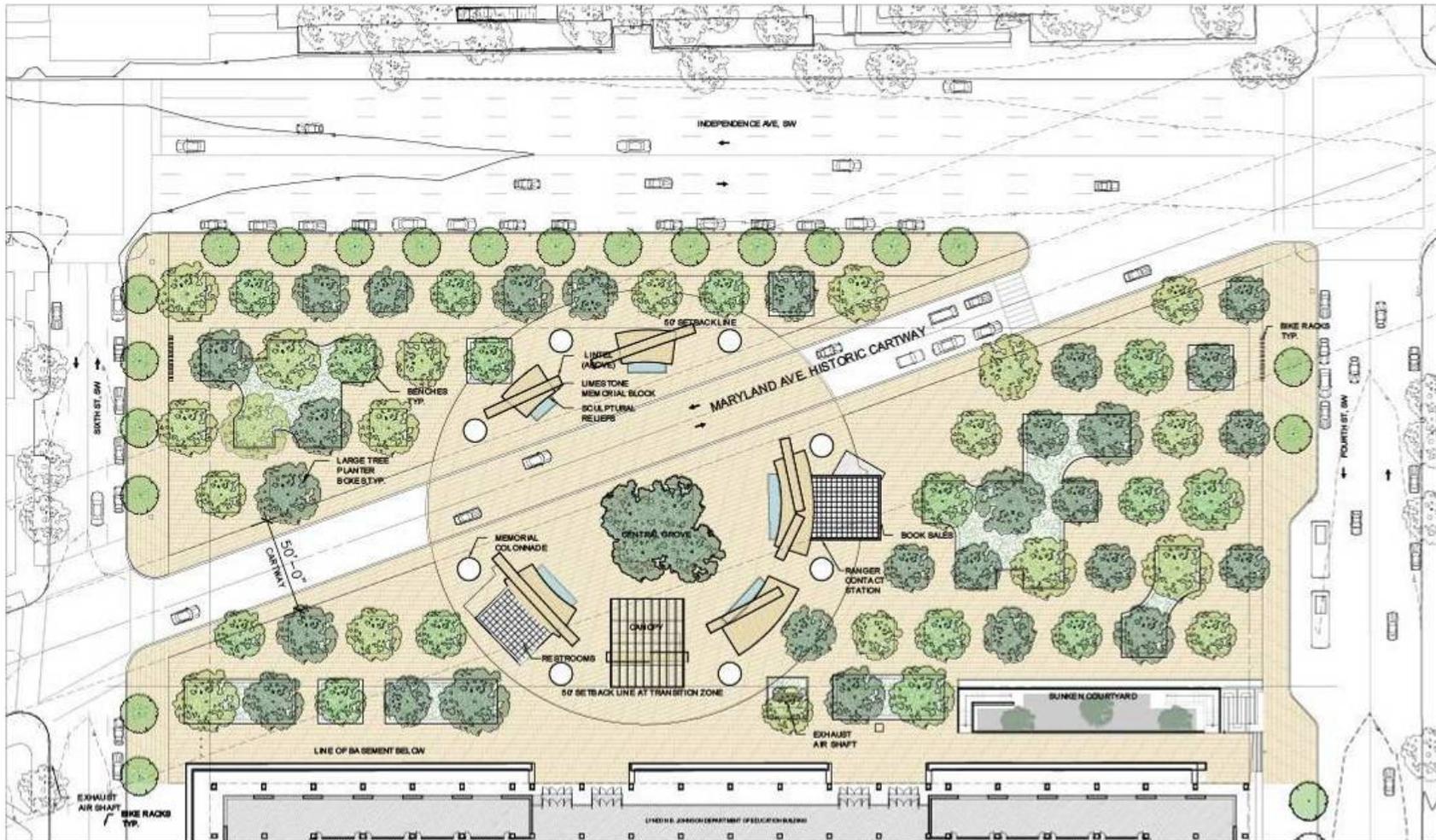


Figure 2-4: Alternative 1 (Maryland Roadway) site plan
Source: Gehry Partners, 2010

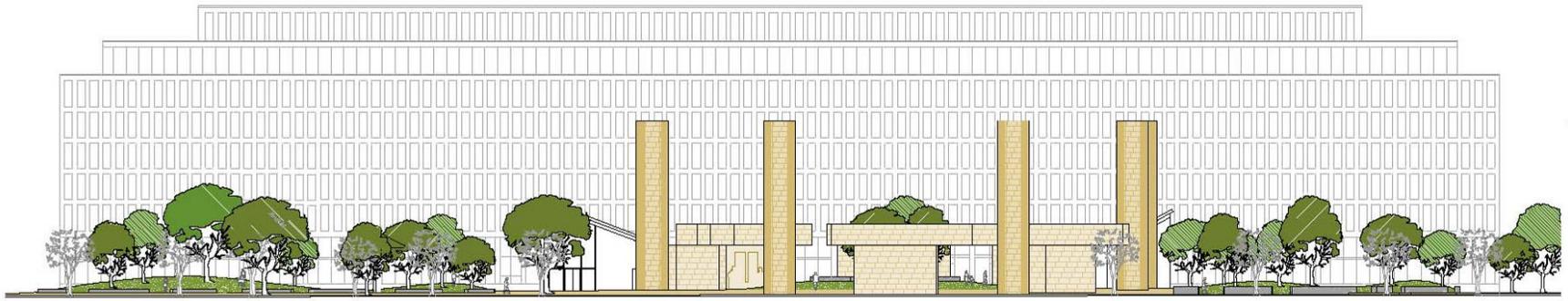


Figure 2-5: Alternative 1, cross-section looking south

Source: Gehry Partners, 2010



Figure 2-6: Alternative 1, cross-section looking east

Source: Gehry Partners, 2010



Figure 2-7: Alternative 1, model view looking northeast along Maryland Avenue
Source: Gehry Partners, 2010

2.2.4 Alternative 2: Maryland Promenade

Alternative 2 is similar to Alternative 1, although there are three key differences. Most importantly, Maryland Avenue would be closed to vehicles under Alternative 2 to create a more cohesive civic space. In addition, under Alternative 2, the designed Memorial features, such as the reliefs, would encompass an expanded area and the plant elements would have a more prominent presence leading to a stronger park setting. Figures 2-8 through 2-11 illustrate Alternative 2.

Alternative 2 would respect the historic diagonal avenue of the L'Enfant Plan by maintaining the view along Maryland Avenue toward the U.S. Capitol. The closure of Maryland Avenue to vehicles at the site would divert traffic around the site at 6th Street, creating a civic square. Eliminating the roadway that bisects the site would also unite the site into a cohesive, contemplative space to commemorate President Eisenhower and his accomplishments.

The central grove of Alternative 2 would be larger than that of Alternative 1, expanding into the Maryland Avenue 50-foot cartway. However, the intrusion into the cartway would not obscure views to the U.S. Capitol. The circular colonnade, which consists of columns 10 feet in diameter and 50 feet high, surrounding the central grove, would be located on both sides of the Maryland Avenue view corridor. The reliefs and lintels would be in approximately the same location and configuration as Alternative 1. However, amphitheater-style seating would be incorporated into the rear of two of the relief blocks, providing places for visitors to rest while considering the

Memorial. Each of these seating areas would be covered by a canopy for inclement weather. The seating would be constructed of stone. Four of the relief blocks would incorporate a water feature facing the central memorial area.

The Ranger contact station would be located to the west of the central Memorial area, north of Maryland Avenue. The bookstore and toilets would be located to the east of the central Memorial area, south of Maryland Avenue. Both of these facilities would be aligned to relate to Maryland Avenue.

In addition to closing the roadway, Alternative 2 would be distinguished from the other alternatives by its landscape. The historic location of the 50-foot cartway would be reflected by using hard materials, such as stone or pavers. This treatment would be extended to the curbs, further reinforcing the idea of the former cartway. The same materials would be carried through in the central Memorial area. The LBJ Promenade and sidewalks along the adjacent streets would be attractively landscaped but with a different material or pattern, differentiating it from the Memorial. The landscape beyond the central Memorial core has a formal grid arrangement of trees installed in larger softscape areas.

Access to the Memorial would be more limited under Alternative 2. Pathways would connect the extensive landscaping to sidewalks and other walkways at various intervals. From the LBJ Promenade, a prominent opening would connect with the central Memorial core. The cartway would also provide pedestrian access to the Memorial.



Figure 2-8: Alternative 2 (Maryland Promenade) site plan
Source: Gehry Partners, 2010

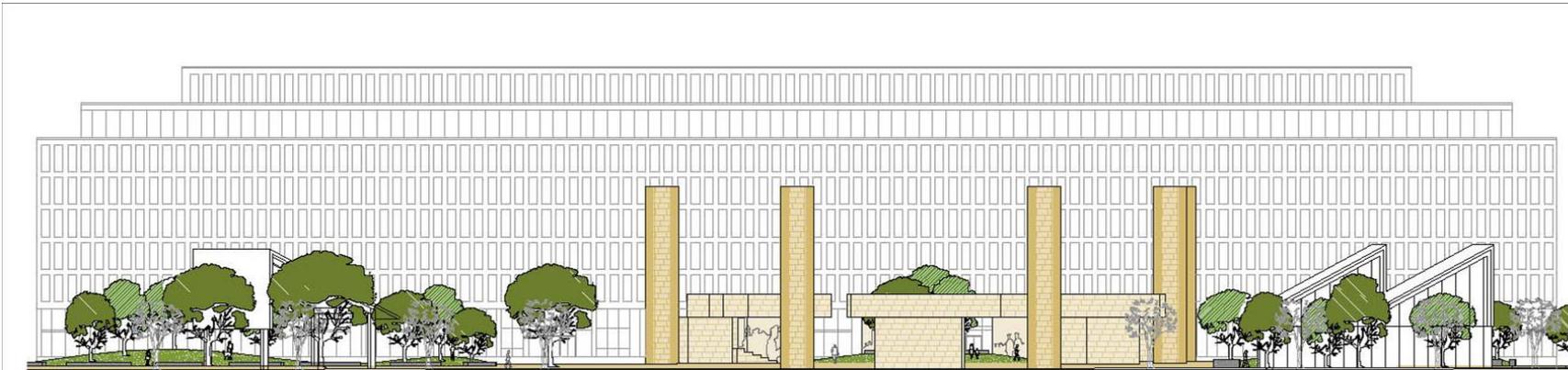


Figure 2-9: Alternative 2, cross-section looking south
Source: Gehry Partners, 2010



Figure 2-10: Alternative 2, cross-section looking east
Source: Gehry Partners, 2010



Figure 2-11: Alternative 2, model looking northeast along Maryland Avenue

Source: Gehry Partners, 2010

2.2.5 Alternative 3: Maryland Park/Tapestry

Alternative 3 would differ from the other alternatives by creating a more expansive park and Memorial. Although Alternative 3 closes the Maryland Avenue cartway to vehicular traffic, similar to Alternative 2, the built Memorial elements and landscaping differ from the other alternatives in location and form. The colonnades would be aligned in a linear manner and would be used to structurally support and display stainless steel tapestries. Three tapestries would be located along 4th and 6th Streets and a along the southern portion of the site. The tapestry elements would create an autonomous precinct to define the site within the larger urban context. Additionally, the tapestries would serve as a unique method of memorialization. The tapestries would depict different Kansan landscape imagery and have been demonstrated to be substantially transparent, as seen in Figure 2-12. Representing a portion of the tapestry that would be installed, the woven tapestry, shown on the left in Figure 2-12 and also shown in Figure 2-17, illustrates a moderate level of transparency. The welded tapestry section, shown on the right in Figure 2-12 and also in Figure 2-18, shows a high level of transparency.

The horizontal and vertical geometry of the tapestries is derived from the LBJ Building. The top of the tapestries would be the same height as the LBJ Building cornice. The bottom of the tapestry relates to the LBJ Building soffit (the underside of part of a building) at the top of the first level exterior. As a result, at full size, the top of the tapestries would be an average of 78 feet (depending upon topography) and the bottom of the tapestry would be at least 15 feet above ground. Figures 2-13 through 2-16 illustrate Alternative 3.

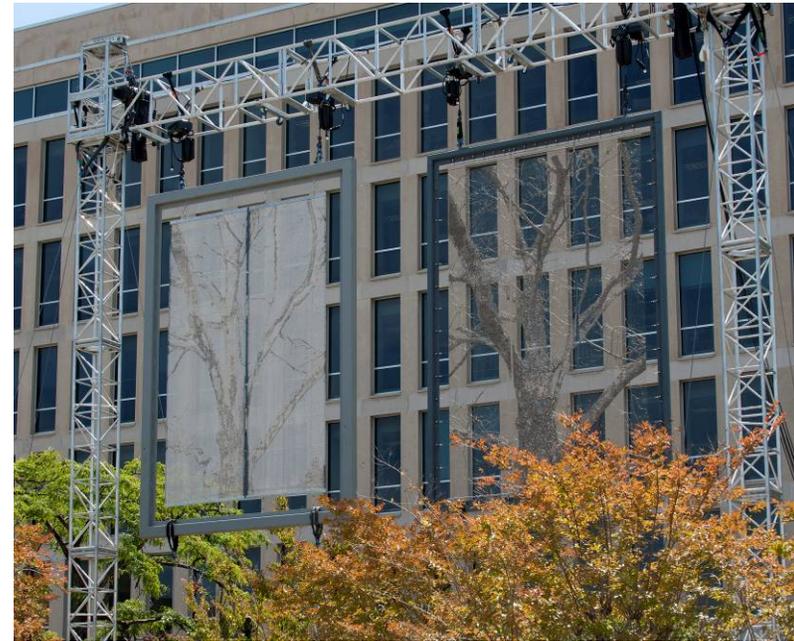


Figure 2-12: Two mock-up examples of a tapestry to illustrate the transparent quality

As opposed to Alternatives 1 and 2, Alternative 3 would align its 11-foot diameter columns linearly along the eastern, western, and southern portions of the Memorial. The closure of Maryland Avenue at the site would divert traffic around the site at 6th Street, creating a civic square. By closing vehicular access at the site, this design would enable a cohesive civic space and monument within the city.

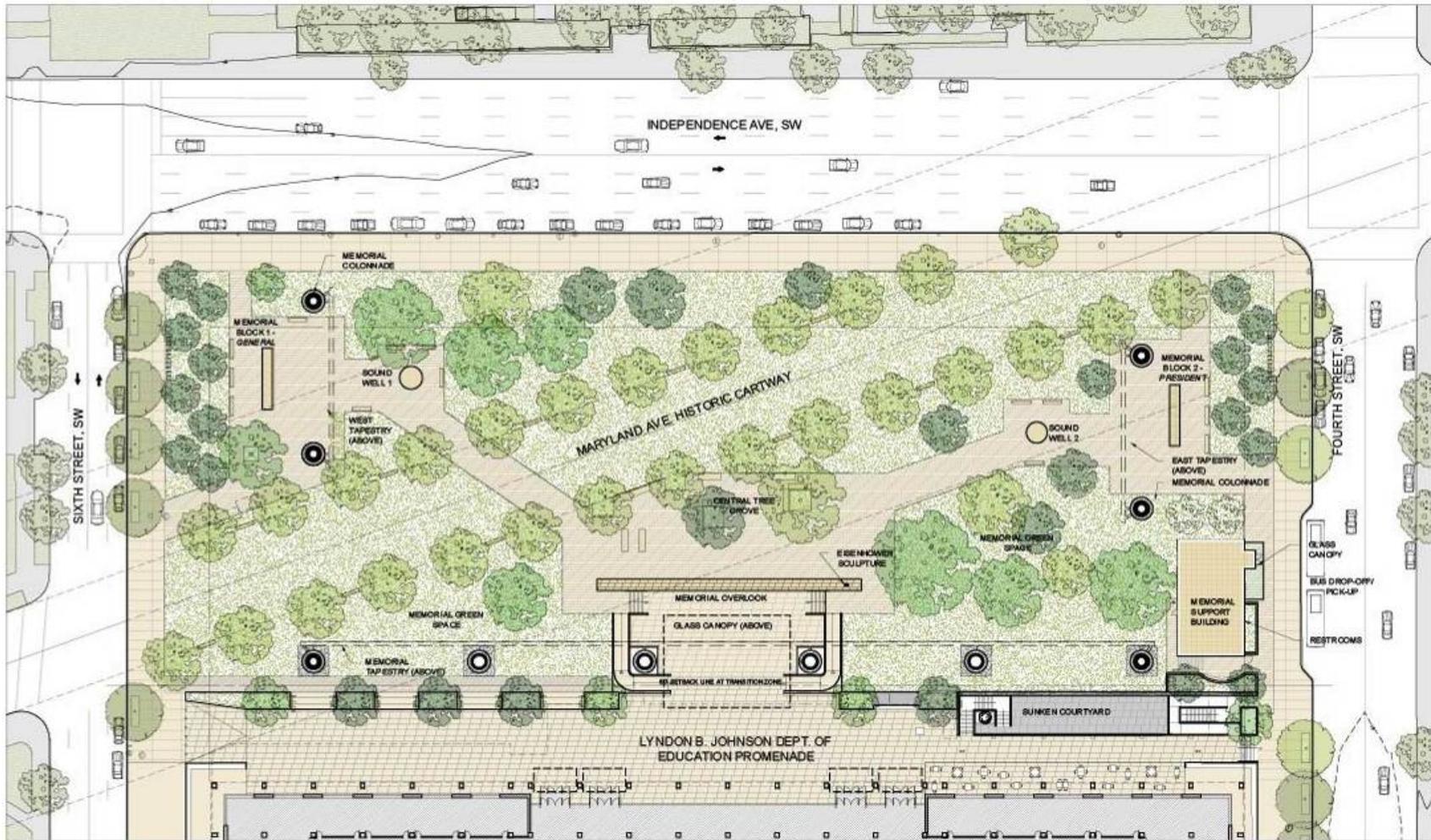


Figure 2-13: Alternative 3 (Maryland Park) site plan
 Source: Gehry Partners, 2011

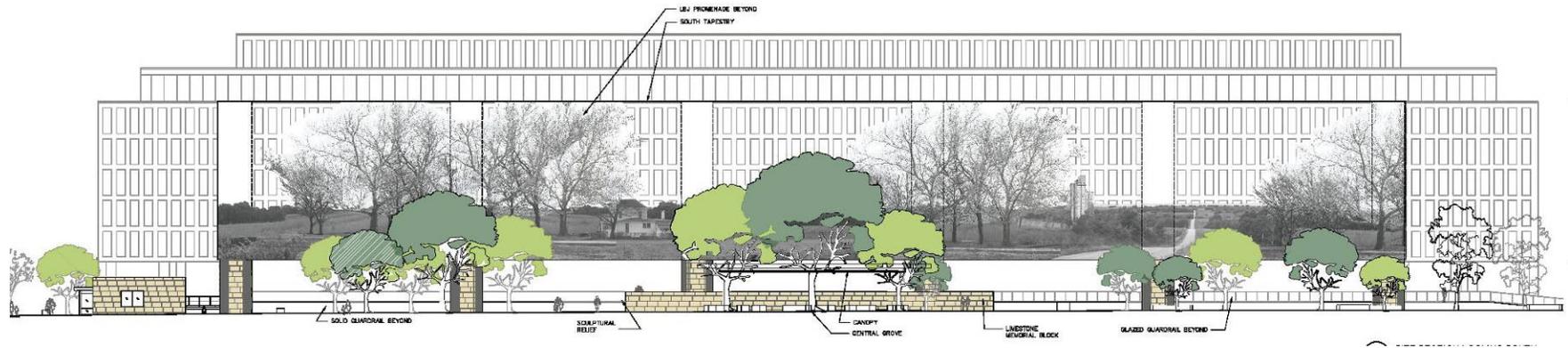


Figure 2-14: Alternative 3, cross-section looking south
 Source: Gehry Partners, 2011



Figure 2-15: Alternative 3, cross-section looking east
 Source: Gehry Partners, 2011



Figure 2-16: Alternative 3, model looking northeast along Maryland Avenue
Source: Gehry Partners, 2011

Eliminating the roadway that bisects the site and installing tapestries on three sides of the site is intended to evoke an urban room, a quiet and contemplative space to commemorate Eisenhower and his military and chief executive accomplishments.

Alternative 3 would defer to the L'Enfant Plan by maintaining the diagonal view along Maryland Avenue toward the U.S. Capitol. The columns inside the Maryland Avenue right-of-way would be located 46 feet from the Maryland Avenue center line and 21-feet from the curb line, thereby observing a 92-foot clearance to frame views of the U.S. Capitol (Figure 2-16). The columns along the southern portion of the site would maintain consistent spacing and would frame the entrance of the LBJ Building. To allow views to the corners of the LBJ Building from the north, the colonnades would be pulled in 44 feet from each end of the LBJ Building and would align with the second bay of the LBJ façade.

The columns along the eastern and western edges of the site would also contain tapestries to help delineate the site. The eastern and western tapestries would be inset from the 4th and 6th Streets rights-of-way, respectively. Bas relief blocks approximately eight feet in height would be placed next to the tapestries along 4th and 6th Streets, parallel to those streets. Landscaping would provide buffer zones between the street and tapestries facing the Wilbur Cohen and Wilbur Wright Buildings.

The other features of the central Memorial would be arranged to form an expansive central core. A paved plaza area would be located in the southern portion of the site, serving as the central Memorial area. At the north edge of the plaza, a grove of trees would serve as a Memorial element. A commemorative wall would form the southern border of the plaza, also serving as the edge of the LBJ Promenade podium. Several benches would be located in the plaza.

A single building that includes the restrooms, ranger contact station, and a book sales area would be located in the southeast portion of the site, aligned with the 4th Street setback.

To respond to the urban space created by the tapestries and the colonnades, the landscape design is intended to “green,” or soften, the site within the Memorial precinct. As opposed to the circular shape of the central Memorial area in the other alternatives, Alternative 3 would instead exhibit a more angular form. Two paths would extend to the plaza from the northeastern and northwestern corners of the site, offering a large green swath between the paths, the Independence Avenue sidewalk, and the plaza. The central plaza would have a collection of large trees and would include a stone relief block. The Maryland Avenue cartway between 4th and 6th Streets would be a view corridor, consisting of an allee of trees and a grassy space of at least 50 feet in width as shown in Figure 2-13. This grassy area would be broken only by the path linking the central Memorial area with the northwest corner of the site.

Beyond the central Memorial area, ground cover would be accented by trees at the site. As described above, trees would be aligned to create an allee observing the Maryland Avenue cartway. In addition, clusters of trees in Alternative 3 would be placed in a more organic arrangement to evoke the character of Kansas, represent a more natural landscape, and complement the imagery on the tapestries.

Formal pedestrian access under Alternative 3 would be provided from the corners of the site at Independence Avenue, from 4th and 6th Streets, and via the LBJ Promenade. Stairs and a ramp from the LBJ Promenade lead to the Memorial. The tapestry elements would serve as portals and formal entrances to the Memorial at three

locations. The cartway would also provide informal access through the grass-covered alley. Informal access to the green space from the adjacent streets would also be available at almost all areas of the Memorial.

From the LBJ Promenade, a central extension would provide a podium overlook to the Memorial, taking advantage of the grade difference. A glass canopy over this podium would provide visitors shelter from the elements. As mentioned above, stairs and a ramp from the podium would lead to the Memorial plaza below.

Tapestry Material Science

As described earlier, Alternative 3 would feature three stainless-steel tapestries. In order to ensure transparency, durability, and the overall artistic and aesthetic value of the tapestries, numerous manufacturing methods and materials testing have been explored. One potential production method would include weaving blackened and non-blackened steel threads in order to generate an image based on the contrast between the threads. Another potential production method would be welding threads to an overall grid of threads (similar to the concept of weaving lace on a transparent veil).

Numerous materials, including varieties of stainless steel threads and Teflon fibers, have been tested to determine how the aging process affects them. In several cases using stainless-steel threads or titanium, no change was discovered at the end of the testing period; in other materials, changes in color or texture were detectable.

Scale mock-ups of the most promising tapestry materials were procured to demonstrate the viability of the process and the transparency of the product. The mock-ups were installed in front

of the LBJ Building between August 31 and September 2, 2011 to coincide with an NCPC commission meeting and a Section 106 consultation. The mock-ups were also installed on-site between September 12 and 16, 2011 to coincide with a CFA meeting. At these times, viewing of the tapestries was open to review agency staff members, and Section 106 consulting parties. NCPC and CFA Commissioners and staff also viewed the tapestries from inside the LBJ Building.



Figure 2-17: Photographs of woven tapestry mock-up at the LBJ Building

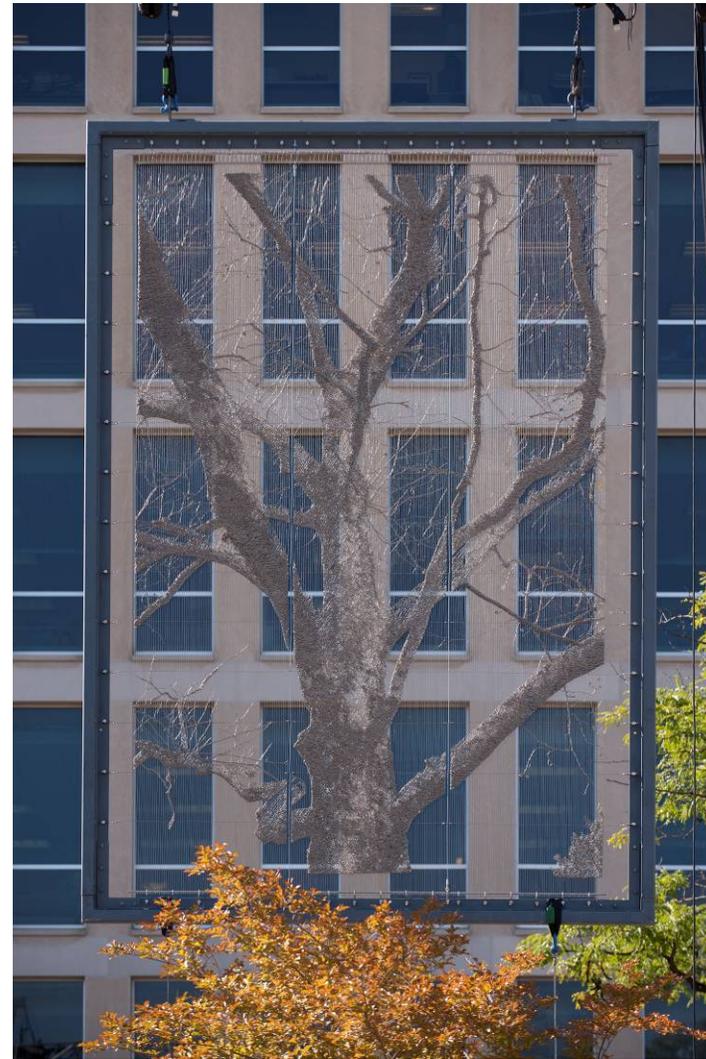


Figure 2-18: Photograph of welded tapestry mock-up at the LBJ Building

2.3 IDENTIFICATION OF THE PREFERRED ALTERNATIVE

NPS and EMC have identified Alternative 3 as the preferred alternative. Alternative 3 (Maryland Park/Tapestry) best meets the purpose and need and design principles for establishing a national memorial to commemorate the accomplishments of Dwight D. Eisenhower. The memorial elements frame the site, are monumental in scale, and provide consistency with the mixed context of the site. The Memorial core is a special area within the larger park setting. At the same time, the entire site can be identified by visitors as the Eisenhower Memorial.

Alternative 1 (the Roadway alternative) would not meet the design principles for the national memorial to Eisenhower. This alternative would maintain vehicular traffic on Maryland Avenue through the Memorial site, which would result in a bisected, and less unified site, greatly diminishing the viability of the site for a contemplative destination. Also, numerous Memorial built elements are located within the right-of-way, on the edge of the 50-foot cartway. In comparison to Alternative 3, Alternative 1 does not preserve reciprocal views to and from the U.S. Capitol.

Alternative 2 (the Promenade alternative) also does not fully meet the design principles for a national memorial to Eisenhower. This alternative does not establish, as strongly as Alternative 3, a memorial that unifies and defines the entire site. Alternative 2 would place the majority of the Memorial elements within the Maryland Avenue right-of-way, which would not defer, as much as Alternative 3, to the L'Enfant Plan and the Maryland Avenue vista.

2.4 CONSTRUCTION STAGING

All project construction would be staged on-site. Equipment and trailers would be stored at the project site. Lay-down activities would be conducted on-site. Occasional deliveries may temporarily block roadway lanes adjacent to the project site. Fencing, signs, and other notices would be placed along the periphery of the site as needed. Sidewalks and the Maryland Avenue entrance to the LBJ Building would be closed temporarily during construction of the LBJ Promenade.

2.5 RELATIONSHIP TO THE NCPC DESIGN PRINCIPLES

As mentioned in Section 1.3, NCPC included seven design principles in its 2006 approval of the Eisenhower Memorial site. These principles were also incorporated into NCPC's FONSI for site selection stating that 'with the mitigation specified in the design principles, to be further developed in the National Historic Preservation Act Section 106 process and a resulting Memorandum of Agreement, and that will be enforced by the Commission in design reviews for this memorial, the Commission's approval of the submitted project site at Maryland and Independence Avenues, 4th and 6th Streets, SW, will not significantly affect the human environment. The following is a discussion of each action alternative's consistency with the design principles.

Alternative 1

- *Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue.*

Alternative 1 would remove overgrowth currently blocking the primary views of the U.S. Capitol along Maryland Avenue and would instead frame views of the dome with columns and trees. The Memorial design would strategically place columns outside the 50-foot cartway (providing a 55-foot clearance), although five columns and four relief blocks would be located within the 160-foot right-of-way. Additionally, the re-alignment of Maryland Avenue to its historical location, as well as the removal of parking for the roadway, would help focus sight lines along Maryland Avenue. This issue is also addressed in Section 4.2.3: Visual Resources.

- *Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.*

Alternative 1 would transform the existing disparate and disjointed plaza into a park setting with a central plaza and visitor amenities. Alternative 1 provides direct visual connections to other public spaces along Maryland Avenue, as described in Section 4.2.3: Visual Resources, by restoring Maryland Avenue to its historic alignment and by placing five columns outside the cartway, providing a 55-foot clearance of the center line, but within the 160-foot right-of-way. To the southwest, Maryland Avenue would link the Memorial to Reservation 113, where Maryland and Virginia Avenues intersect. To the northeast, Maryland Avenue would link the Memorial to the Mall and the U.S. Capitol Grounds. However, as Maryland Avenue remains open to vehicular traffic under Alternative 1, the functional value of the public space at the Memorial site is diminished. This issue is also addressed in Section 4.8: Visitor Use and Experience.

- *Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.*

Under Alternative 1, the Memorial would serve as public space and provide an attractive feature that would also unify the surrounding precinct. However, under Alternative 1 Maryland Avenue would remain open to vehicular traffic, which would detract from the goal of creating a functional public gathering space. The current plaza and park land, while open, is spare and uninviting, and offers few visitor

amenities. The Memorial would offer educational, artistic, and natural experiences, as well as public gathering space, as part of a cohesive site. It would also unify the surrounding precinct by establishing a large urban park in a fragmented part of the city. By realigning Maryland Avenue to its historical location and establishing an attractive destination, the Memorial would strengthen Maryland Avenue as a central spine and help connect and unify the surrounding precinct. The circular colonnade would straddle both sides of Maryland Avenue, serving to unify the site. This is evaluated in the Section 4.3: Visual Resources and Section 4.8: Visitor Use and Experience.

- *Reflect L'Enfant Plan principles by shaping the Memorial site as a separate and distinct public space that complements the DEd Headquarters and other surrounding buildings.*

The Memorial site is bounded by roadways on three sides and a large building on the fourth side, each of which provides clear boundaries to the Memorial. The focus of Alternative 1 on 79 new trees and green space would serve to distinguish the public space from the urban context surrounding the Memorial. The LBJ Promenade would help define the southern boundary of the site, thereby helping to establish the Memorial as a separate and distinct public space. It would complement and activate the forecourt of the Building and give it the character of a street. The LBJ Promenade would enhance the existing public space at the entrance of the LBJ Building. The LBJ Promenade would provide an entry to the LBJ Building, where signage and lighting would identify the entrance to the Building. The grade from the LBJ Building to Independence Avenue would

be continuous, and would cohesively integrate the spaces. The height of the colonnade, at 65 feet, would not directly relate to the LBJ Building through its horizontal building elements, such as its cornice line or fenestration. The three other adjacent buildings would also help define the Memorial as a civic square by providing visual boundaries.

Under Alternative 1, Maryland Avenue would be realigned and open to vehicular traffic, which would detract from the goal of a distinct public space. This is evaluated in the Section 4.2.3: Visual Resources and Section 4.8: Visitor Use and Experience.

- *Respect and complement the architecture of the surrounding precinct.*

Under Alternative 1, the columns, trees, and built Memorial features would be consistent with NASM, the Wilbur Cohen Building, the LBJ Building, and the Wilbur Wright Building. The Memorial elements, including the columns, would be shorter than the neighboring buildings, although the 65-foot height of the colonnade would not directly relate through references to horizontal elements to these Buildings, such as cornice lines or fenestration. These surrounding large-scale buildings have varying setbacks, styles, cornice lines, and heights. Durable building materials, including stone, would be consistent with the surrounding area. This is evaluated in the Section 4.2.2: Historic Resources.

- *Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.*

Along Maryland Avenue, buildings between the U.S. Capitol and Reservation 113 are aligned along north-south streets (7th Street) or east-west streets (e.g. Independence Avenue), resulting in an inconsistent streetwall. By framing the trees along Maryland Avenue, with the built features located outside of the 50-foot cartway, and restoring its historical alignment, Alternative 1 would respect the existing alignment of trees. Alternative 1 would not intrude into the rights-of-way of 4th or 6th Streets or Independence Avenue. This is evaluated in the Section 4.3: Visual Resources.

- *Incorporate significant green space into the design of the Memorial.*

Alternative 1 would increase both the number and quality of trees, replacing immature or under-developed trees with more robust and/or mature trees. Alternative 1 would improve existing root systems, soils, and on-site drainage enabling the new trees to flourish. However, the amount of green space would decrease by 0.6 acres. This is evaluated in Section 4.7: Vegetation.

Alternative 2

- *Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue.*

Alternative 2 would remove overgrowth currently blocking the primary views of the U.S. Capitol along Maryland Avenue and would instead frame views of the dome with columns and trees. The Memorial design would strategically place columns (outside the 50-foot cartway providing a 55-foot clearance), although five columns and four relief blocks would be located within the 160-foot right-of-way. Additionally, the re-alignment of Maryland Avenue to its historical location, as well as the removal of parking for the roadway, would help focus sight lines along Maryland Avenue. This issue is also addressed in Section 4.3: Visual Resources.

- *Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.*

Alternative 2 would transform the existing disparate and disjointed plaza into a park setting with a central plaza and visitor amenities. Alternative 2 provides direct visual connections to other public spaces along Maryland Avenue, as described in Section 4.3: Visual Resources, by restoring Maryland Avenue to its historic alignment and by placing five columns outside the cartway, providing a 55-foot clearance around the center line, but within the 160-foot right-of-way. To the southwest, Maryland Avenue would link the Memorial to Reservation 113, where Maryland and Virginia Avenues intersect. To the northeast, Maryland

Avenue would link the Memorial to the Mall and the U.S. Capitol Grounds. This issue is also addressed in Section 4.8: Visitor Use and Experience.

- *Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.*

Under Alternative 2, the Memorial would serve as public space and provide an attractive feature that would also unify the surrounding precinct. The current plaza and park land, while open, is spare and uninviting, and offers few visitor amenities. The Memorial would offer educational, artistic, and natural experiences, as well as public gathering space, as part of a cohesive site. It would also unify the surrounding precinct by establishing a large urban park in a fragmented part of the city. By realigning Maryland Avenue to its historical location and establishing an attractive destination, the Memorial would strengthen Maryland Avenue as a central spine and help connect and unify the surrounding precinct. The circular colonnade would straddle both sides of the Maryland Avenue cartway, serving to unify the site. This is evaluated in the Section 4.3: Visual Resources and Section 4.8: Visitor Use and Experience.

- *Reflect L'Enfant Plan principles by shaping the Memorial site as a separate and distinct public space that complements the DEd Headquarters and other surrounding buildings.*

The focus of Alternative 2 on trees and green space, as well as the closure of Maryland Avenue to vehicular traffic,

would serve to distinguish the public space from the urban context surrounding the Memorial. The LBJ Promenade would help define the southern boundary of the site, thereby helping to establish the Memorial as a separate and distinct public space. The Promenade would complement and activate the forecourt to the Building, giving it the character of a street. The three other adjacent buildings would also help define the Memorial as a civic square by providing visual boundaries. The installation of 95 new trees and green space would serve to enhance the existing public space at the entrance of the LBJ Building and complement the usage of public space in the LBJ Promenade. Elevated above the Memorial, the LBJ Promenade would rise to entry level of the LBJ Building, where signage and lighting would identify the entrance to the Building. The height of the colonnade, at 50 feet, would not directly relate to the LBJ Building. This is evaluated in the Section 4-3: Visual Resources and Section 4.8: Visitor Use and Experience.

- *Respect and complement the architecture of the surrounding precinct.*

Under Alternative 2, the columns, trees, and built Memorial features would be consistent with the NASM, the Wilbur Cohen Building, the LBJ Building, and the Wilbur Wright Building. These surrounding large-scale buildings have varying setbacks, styles, cornice lines, and heights. The Memorial elements, including the columns, would be shorter than the neighboring buildings, although the 50-foot height of the colonnade would not directly relate through references to horizontal elements to these Buildings, such as cornice lines or fenestration. The west entrance along the

LBJ Building's northern elevation would align with one set of stairs leading from the LBJ Promenade to the Memorial. Durable building materials, including stone, would be consistent with the surrounding area. These surrounding large-scale buildings have varying setbacks, styles, cornice lines, and heights. Durable building materials, including stone, would be consistent with the surrounding area. This is evaluated in the Section 4.2.2: Historic Resources.

- *Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.*

Along Maryland Avenue, buildings between the U.S. Capitol and Reservation 113 are aligned along north-south streets (7th Street) or east-west streets (e.g. Independence Avenue), resulting in an inconsistent streetwall. By placing trees along Maryland Avenue, with the built features located outside of the 50-foot cartway, and restoring its historical alignment, Alternative 2 would respect the existing alignment of trees. Alternative 2 would not intrude into the rights-of-way of 4th or 6th Streets or Independence Avenue. This is evaluated in the Section 4.2.3: Visual Resources.

- *Incorporate significant green space into the design of the Memorial.*

Alternative 2 would increase both the number and quality of trees, replacing immature or under-developed trees with more robust and/or mature trees. Alternative 2 would improve existing root systems, soils, and on-site drainage enabling the 95 new trees to flourish. The amount of green

space would increase by 0.61 acres. This is evaluated in Section 4.7: Vegetation.

Alternative 3

- *Preserve reciprocal views to and from the U.S. Capitol along Maryland Avenue.*

Alternative 3 would remove overgrowth currently blocking the primary views of the U.S. Capitol along Maryland Avenue and would instead frame views of the dome with columns and trees. Alternative 3 would place columns 46 feet from the Maryland Avenue center line, which would allow a 92-foot clearance of the cartway's center line. Four columns and two relief blocks would be located within the 160-foot Maryland Avenue right-of-way. The columns would symmetrically frame view northeast, with the U.S. Capitol in the center. Alternative 3 would place both trees and columns in locations that preserve the primary views as seen by pedestrians. Additionally, the re-alignment of Maryland Avenue to its historical location would help focus sight lines along Maryland Avenue. The removal of parking and the closure of Maryland Avenue to vehicular traffic would reinforce these sight lines. This issue is also addressed in Section 4.3: Visual Resources.

- *Enhance the nature of the site as one in a sequence of public spaces embellishing the Maryland Avenue vista.*

Alternative 3 would transform the existing disjointed parcels and spare plaza into a park setting consistent with established L'Enfant squares. Alternative 3 would provide direct visual connections to other public spaces along Maryland Avenue as described in Section 4.3: Visual Resources, by restoring the Maryland Avenue view corridor

to its historic alignment and by placing providing a 92-foot clearance around the center line, with four columns outside the cartway but visible within the Maryland Avenue view corridor. To the southwest, Maryland Avenue would link the Memorial to Reservation 113, where Maryland and Virginia Avenues intersect. To the northeast, Maryland Avenue would link the Memorial to the Mall and the U.S. Capitol Grounds. This issue is also addressed in Section 4.8: Visitor Use and Experience.

- *Create a unified memorial site that integrates the disparate parcels into a meaningful and functional public gathering place that also unifies the surrounding precinct.*

Under Alternative 3, the Memorial would function as a public gathering space and would provide an attractive feature that would also unify the surrounding precinct by establishing a large urban park in a fragmented part of the city. The tapestries would serve to create a sense of an urban room, thereby unifying the site as a distinct place within the large urban context. The current plaza and park land, while open, is spare and uninviting, and offers few visitor amenities. The Memorial would offer educational, artistic, and natural experiences, as well as public gathering space, as part of a cohesive site. It would also unify the surrounding precinct. The LBJ Promenade would also include a podium overlooking the Memorial, which would be used as a sheltered gathering space. By realigning Maryland Avenue to its historical location and establishing an attractive destination, the Memorial would strengthen Maryland Avenue as a central spine and help connect and unify the surrounding precinct. This issue is evaluated in

the Section 4.3: Visual Resources and Section 4.8: Visitor Use and Experience.

- *Reflect L'Enfant Plan principles by shaping the Memorial site as a separate and distinct public space that complements the DEd Headquarters and other surrounding buildings.*

The Memorial site is bounded by roadways on three sides and a large building on the fourth side, each of which provides clear boundaries to the Memorial. By incorporating the LBJ Building into its design through the creation of the LBJ Promenade, it would complement and activate the forecourt of the Building. The Promenade would evoke the character of a street, thereby acting to create a memorial square bound by four streets. The installation of 81 trees and green space would serve to enhance the existing public space at the entrance of the LBJ Building and complement the usage of public space in the LBJ Promenade. Elevated above the Memorial, the LBJ Promenade would rise to entry level of the LBJ Building, where signage and lighting would identify the entrance to the Building. The LBJ Promenade's entrances to the Memorial would align with the Building's main entrance. Alternative 3's tapestries would align with the second bay at each end of the LBJ Building, and the bottom of the tapestries would align with the first floor soffit of the LBJ Building façade, complementing the building. The upper floors of the LBJ Building would be unobstructed, as would the eastern and western portions of the Building's north elevation. Additional references to the building design within the landscape would include the podium that extends from the LBJ Promenade into the Memorial.

The tapestries of the Memorial would also help to visually define the Memorial space as a more intimate area, in comparison to the large buildings surrounding the site. The other adjacent buildings would provide secondary visual boundaries to the site. This issue is evaluated in the Section 4.3: Visual Resources and Section 4.8: Visitor Use and Experience.

- *Respect and complement the architecture of the surrounding precinct.*

Under Alternative 3, the columns, trees, and built Memorial features would be consistent with the scale and context of the NASM, the Wilbur Cohen Building, the LBJ Building, and the Wilbur Wright Building. These surrounding large-scale buildings have varying setbacks, styles, cornice lines, and heights. The alignment of the 78-foot high colonnades and tapestries along 4th and 6th Streets would complement the building setbacks along those streets. One column would be located 31 feet from the Independence Avenue curb line, outside of its right-of-way. The streetwall along Independence Avenue varies between 14th and 2nd Streets, with building setbacks ranging from 16 feet to 110 feet. Durable building materials, including stone, would be consistent with the surrounding area. This issue is evaluated in the Section 4.2.2: Historic Resources.

- *Respect the building lines of the surrounding rights-of-way and the alignment of trees along Maryland Avenue.*

Along Maryland Avenue, buildings between the U.S. Capitol and Reservation 113 are aligned along north-south streets

(7th Street) or east-west streets (e.g. Independence Avenue), resulting in an inconsistent streetwall. An alley of trees would be placed outside the Maryland Avenue cartway, supporting the alignment of trees along the roadway. Alternative 3 would place the ranger contact station and book sales along the 4th Street right-of-way, consistent with neighboring buildings. No Memorial elements or structures would intrude into the rights-of-way of 4th or 6th Streets. The northern-most column and its associated tapestry would not extend into the Independence Avenue right-of-way. The column would be located 31 feet from the curb. The Independence Avenue street wall varies between 2nd and 14th Streets. The ranger contact station would be entirely outside the Maryland Avenue right-of-way. Four columns of the linear colonnades and two relief blocks would be located outside

of the roadway (cartway), but within the 160-foot Maryland Avenue right-of-way. This is evaluated in the Section 4.3: Visual Resources.

- *Incorporate significant green space into the design of the Memorial.*

Alternative 3 would increase both the number and quality of trees, replacing immature or under-developed trees with more robust and/or mature trees. Alternative 3 would improve existing root systems, soils, and on-site drainage enabling the 81 new trees to flourish. The amount of green space would substantially increase by 1.07 acres. This issue is evaluated in Section 4.7: Vegetation.

2.6 MITIGATION MEASURES OF THE ACTION ALTERNATIVES

NPS places a strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. To help ensure the protection of natural and cultural resources and the quality of the visitor experience, the following protective measures would be implemented as part of the selected action alternative. NPS would implement an appropriate level of monitoring throughout the construction process to help ensure that protective measures are being properly implemented and are achieving their intended results.

Cultural Resources

- If during construction, archeological resources are discovered, all work in the immediate vicinity of the discovery would be halted until the resources can be identified and documented and an appropriate mitigation strategy developed. If necessary, consultation with the DC Historic Preservation Officer, NPS, and/or the NPS Regional Archeologist will be coordinated to ensure that the protection of resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 would be followed.
- Additional mitigation for impacts on archeological, historic, and visual resources may be determined during the Section 106 consultation process. A memorandum of agreement between NPS, DC SHPO, ACHP, and EMC would be developed as part of

this process to mitigate adverse impacts to cultural resources. Potential mitigation measures that could be identified in the MOA include: incorporation of archeological findings into the e-Memorial, an online source of information about Eisenhower and the Memorial site; a Historic American Landscape Survey to document the LBJ Building plaza; and, for Alternative 3, the recognition of the former Maryland Avenue cartway in the Memorial design.

- Ongoing consultation would also be specified in the MOA. As the Memorial design advances, placement of trees and built elements near the historic Maryland Avenue cartway should be sensitive to the view corridor to help diminish impacts on the L'Enfant and McMillan Plans and to maintain the open character of these historic resources. These changes would be coordinated through the ongoing consultation process.

Visual Resources

- The NPS, the DC SHPO, GSA, and the EMC are developing an MOA that would stipulate that consultation will continue through the detailed design process. This agreement would allow for the design to advance while incorporating elements, such as changes to the placement of built features to maintain the open character of the vista, which would mitigate adverse impacts to visual resources

Soils

- Prior to construction, an erosion and sedimentation control plan that establishes measures to prevent erosion of cleared areas and the transport of soil and sediment would be prepared.

- During construction, soils exposed by clearing, grading, excavation, or construction would be stabilized. Soils would be stockpiled using appropriate best management practices.
- Soils excavated would be subject to sampling and testing, should indicators of petroleum-impacted soils present themselves during excavation and construction.
- If determined to contain petroleum hydrocarbons, the soils would be removed and disposed of in accordance with a safety plan approved by District of Columbia Department of the Environment (DDOE).
- Appropriate regulatory notification would occur.
- Impacted soils would be segregated through field screening.
- Waste characterization samples would be collected.
- Soils would be disposed of at an appropriate waste disposal facility.
- Removal activities would be documented.

Transportation

If Alternative 1, which maintains vehicular use of Maryland Avenue, is adopted, the following measures would be implemented:

- The stop bar for eastbound Independence Avenue would be moved approximately 100 feet to the west in order to accommodate vehicular access from Maryland Avenue to the intersection of Independence Avenue and 4th Street, resulting in

a loss of vehicle storage space. The signalization clearance time for traffic passing through the intersection would be longer in the eastbound direction.

- In addition, the intersection design would need to be altered. This mitigation would enhance safety and traffic operations by making Maryland Avenue one-way in a west-to-east direction. A curb bulb-out would be provided at each end of this segment of Maryland Avenue to create a single lane entrance and exit condition. The crossing width would be shorter for pedestrians crossing Maryland Avenue.
- The LOS at the intersection of 6th Street and Maryland Avenue could improve as a result of the one-way operation, eliminating the westbound traffic demand approaching the intersection. The conflicting vehicular movement between the through traffic and left turn movement would be eliminated at 4th Street and Independence Avenue when intersecting with Maryland Avenue.
- Changes to the street network could potentially confuse motorists and pedestrians who were accustomed to the previous road and sidewalk configuration. Therefore, these changes would require signage placed at key locations and intersections to alert and safely re-direct vehicles and pedestrians during construction.

If Alternative 1, 2, or 3 is adopted, the following measures would be implemented:

- Temporary signage would be placed at key locations and intersections to alert and safely re-direct vehicles during construction.

- Visitors would be informed of parking areas in pre-arrival information, such as on the website or in brochures.
- Visitors would be encouraged to use alternate forms of transportation, such as bus or rail, to reach the site through pre-arrival information.

Water Resources

- An erosion and sedimentation control plan and a stormwater management plan would be prepared.

Visitor Use and Experience

- NPS would provide information regarding construction on its NAMA website and distribution lists.

2.7 ALTERNATIVES CONSIDERED BUT DISMISSED

Several alternative configurations of the Eisenhower Memorial site were explored and dismissed in the 2006 Proposed Dwight D. Eisenhower Memorial Site Selection EA (NPS, 2006). Subsequently, additional alternatives or alternative elements were identified during public scoping for this EA and during the ongoing consultation process. Some of these were determined to be unreasonable, or much less desirable than similar options included in the analysis, and were therefore not carried forward for analysis in this EA. Justification for eliminating alternatives from further analysis was based on factors relating to:

- Conflict with the stated purpose and need for the Memorial project;
- Not technically or economically feasible;
- Conflict with existing plans and policies; and
- Potentially severe impact on environmental or historic resources.

The following represent the alternatives considered and dismissed from further consideration in this EA.

2.7.1 Creation of a Square Bounded by Roadways

During the scoping process, some comments suggested developing a street along the southern border of the site to create a formal urban square, bounded by roadways on four sides. Such a square would be operationally consistent with others in Washington, DC and would evoke the L'Enfant Plan. This road would also serve to formally

separate the Memorial from the LBJ Building, located just south of the site. However, under a standard configuration, the basement and many components of the LBJ Building's heating and cooling systems are located underneath what would become the street. In this configuration, extensive efforts would be required to make the new street technically feasible to carry the loads of vehicular traffic. Such a street would not be within the project's economic constraints. Additionally, security setbacks for the DEd, housed in the LBJ Building, would necessitate the closure of the street, were it constructed, thus conflicting with the goal of maintaining a new roadway and with existing plans and policies. Therefore, this alternative was eliminated from further consideration.

2.7.2 Retention of the Plaza

Because the existing plaza in front of the LBJ Building was designed in conjunction with the building, consideration was given to an alternative that would retain the existing plaza in its current configuration. However, because the plaza would occupy more than 40 percent of the site, this option would limit the Eisenhower Memorial to a triangular parcel that would be less than 51 percent of the total site area (approximately 9 percent of the site would be unused for either the Memorial or the plaza due to the configuration of the site components). Due to the limited space for the Memorial, this would conflict with the stated purpose and need for the Memorial project. Such a small parcel would not befit the significance of Eisenhower as a preeminent figure in global history from during the 20th century. Therefore, this alternative was eliminated from further consideration.

2.8 ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The environmentally preferable alternative is defined by CEQ as the alternative that would promote the national environmental policy as expressed in NEPA. This includes:

1. Fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assuring for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. Preserving important historic, cultural and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice;
5. Achieving a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities; and
6. Enhancing the quality of renewable resources and approaching the maximum attainable recycling of depletable resources (NEPA, Section 101).

NPS is required to identify the environmentally preferable alternative in its NEPA documents for public review and comment. NPS, in accordance with the Department of Interior policies contained in the Departmental Manual (516 DM 4.10) and CEQ's

EPA's Forty Most Asked Questions, defines the environmentally preferable alternative (or alternatives) as the alternative that best promotes the national environmental policy expressed in NEPA (Section 101 (b) (5164.10)). In their *Forty Most Asked Questions*, CEQ further clarifies the identification of the environmentally preferable alternative, stating "ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources" (Q6a).

The No Action Alternative would not impact biological or natural resources nor cultural resources. It would not degrade the environment through disturbance of soils or removal of vegetation. Views and other elements of cultural resources would not be affected by the No Action Alternative; the existing cultural resources would continue to be managed similar to existing practices. The No Action Alternative would continue to provide open and cultural space to the visiting public. As a result, after completing the environmental analysis, NPS identified the No Action Alternative as the environmentally preferable alternative in this EA and the alternative that best meets the definition established by the CEQ.

2.9 SUMMARY OF ENVIRONMENTAL CONSEQUENCES

A summary of the environmental consequences as a result of the alternatives described in this chapter follows in Table 2-2. The full analysis for each impact topic is found in Section 4.

Table 2-2: Summary of Impacts to Resources by Alternative

| Impact Topic | No Action Alternative | Alternative 1: Maryland Roadway | Alternative 2: Maryland Promenade | Alternative 3: Maryland Park/Tapestry |
|------------------------------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Cultural Resources: Archeological Resources | Because no ground-disturbing activities would take place, there would be no impact. | Due to the installation of Memorial elements and the subsequent soil disturbance, there would be negligible to moderate adverse impacts and cumulative impacts. | Due to the installation of Memorial elements and the subsequent soil disturbance, there would be negligible to moderate adverse impacts and cumulative impacts. | Due to the installation of Memorial elements and the subsequent soil disturbance, there would be negligible to moderate adverse impacts and cumulative impacts. |

| Impact Topic | No Action Alternative | Alternative 1: Maryland Roadway | Alternative 2: Maryland Promenade | Alternative 3: Maryland Park/Tapestry |
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| Cultural Resources: Historic Resources | The Memorial would not be constructed. Therefore, there would be negligible adverse impacts on historic resources. | The Memorial would restore Maryland Avenue to its historic alignment, resulting in beneficial impacts on the L’Enfant and McMillan Plans, and would alter the Maryland Avenue view corridor, resulting in minor adverse impacts to the Plans. The Memorial would remove the LBJ Building plaza, resulting in moderate adverse impacts on the LBJ Building. The Memorial elements would be visible, to varying degrees, from historic resources, resulting in minor adverse impacts on the Wilbur and Orville Wright Building and the Wilbur Cohen Building and negligible impacts on the U.S. Botanical Garden and the U.S. Capitol. There would be long-term moderate adverse cumulative impact on the L’Enfant Plan and minor adverse cumulative impact on the National Mall.. | The Memorial would restore Maryland Avenue to its historic alignment, resulting in beneficial impacts on the L’Enfant and McMillan Plans, and would alter the Maryland Avenue view corridor, resulting in minor adverse impacts to the Plans. The Memorial would remove the LBJ Building plaza, resulting in moderate adverse impacts on the LBJ Building. The Memorial elements would be visible, to varying degrees, from historic resources, resulting in minor adverse impacts on the Wilbur and Orville Wright Building and the Wilbur Cohen Building and negligible impacts on the U.S. Botanical Garden and the U.S. Capitol. There would be long-term moderate adverse cumulative impact on the L’Enfant Plan and minor adverse cumulative impact on the National Mall.. | The Memorial would restore Maryland Avenue to its historic alignment, resulting in beneficial impacts on the L’Enfant and McMillan Plans, and would alter the Maryland Avenue view corridor, resulting in moderate adverse impacts to the Plans. The Memorial would remove the LBJ Building plaza, resulting in moderate adverse impacts on the LBJ Building. The Memorial elements would be visible, to varying degrees, from historic resources, resulting in minor adverse impacts on the Wilbur and Orville Wright Building and the Wilbur Cohen Building and negligible impacts on the U.S. Botanical Garden and the U.S. Capitol. There would be long-term moderate adverse cumulative impact on the L’Enfant Plan and minor adverse cumulative impact on the National Mall... |

| Impact Topic | No Action Alternative | Alternative 1: Maryland Roadway | Alternative 2: Maryland Promenade | Alternative 3: Maryland Park/Tapestry |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Visual Resources | The Memorial would not be constructed. Therefore, there would be negligible adverse impacts on visual resources and no cumulative impacts. | Installation of Memorial elements would result in changes to the views and vistas along view corridors. The installation of trees and Memorial elements would alter views to and from the lower levels of the LBJ Building. Given the varying degree of changes, Alternative 1 would result in negligible to minor adverse impacts on visual resources. There would be long-term minor cumulative impacts to the Maryland Avenue view. | Installation of Memorial elements would result in changes to the views and vistas along view corridors. The installation of trees and Memorial elements would alter views to and from the lower levels of the LBJ Building. Given the varying degree of changes, Alternative 2 would result in negligible to minor adverse impacts on visual resources. There would be long-term minor cumulative impacts to the Maryland Avenue view. | Installation of Memorial elements, including the tapestry, would result in changes to the views and vistas along view corridors. The tapestry would alter views to and from the LBJ Building but would not change the amount of direct sunlight received. Given the varying degree of changes, Alternative 3 would result in minor to moderate adverse impacts on visual resources. There would be long-term moderate cumulative impacts to the Maryland Avenue view. |
| Park Operations and Management | Existing management practices would continue. Therefore, there would be no impact. | Alternative 1 would require a higher level of maintenance and staffing than the current NPS parcel. Therefore, there would be a minor adverse impact. There would be short-term moderate adverse cumulative impacts and long-term minor adverse cumulative impacts. | Alternative 2 would require a higher level of maintenance and staffing than the current NPS parcel. Therefore, there would be a minor adverse impact. There would be short-term moderate adverse cumulative impacts and long-term minor adverse cumulative impacts. | Alternative 3 would require a higher level of maintenance and staffing than the current NPS parcel. Therefore, there would be a minor adverse impact. There would be short-term moderate adverse cumulative impacts and long-term minor adverse cumulative impacts. |

| Impact Topic | No Action Alternative | Alternative 1: Maryland Roadway | Alternative 2: Maryland Promenade | Alternative 3: Maryland Park/Tapestry |
|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Soils | No soils would be disturbed or removed. Amendments would be made by community gardeners. Therefore, there would be beneficial impacts to soils. There would be short-term minor adverse cumulative impacts and long-term beneficial cumulative impacts. | Alternative 1 would disturb and remove existing soils on-site. The soil matrix and drainage would be improved. However, the amount of unpaved soils at the site would decrease. Therefore, there would be a long-term minor adverse impact. There would be short and long-term minor adverse cumulative impacts. | Alternative 2 would disturb and remove existing soils on-site. The soil matrix and drainage would be improved. Therefore, there would be a long-term beneficial impact. There would be short-term minor adverse cumulative impacts and long-term beneficial cumulative impacts. | Alternative 3 would disturb and remove existing soils on-site. The soil matrix and drainage would be improved. Therefore, there would be a long-term beneficial impact. There would be short-term minor adverse cumulative impacts and long-term beneficial cumulative impacts. |
| Transportation: Traffic | Traffic would increase at an average rate of 1.6 percent annually, resulting in a decline of level of service (LOS) at four intersections and an improved LOS at one intersection. Therefore, there would be long-term minor adverse impacts on traffic. There would be short-term minor adverse and long-term beneficial cumulative impacts. | Alternative 1 would restore Maryland Avenue to its historical alignment and maintain vehicular access, resulting in a decline in LOS for seven intersections and an improved LOS for four intersections. Therefore, there would be moderate adverse impacts on traffic. There would be short-term minor adverse cumulative impacts and long-term moderate adverse cumulative impacts. | Alternative 2 would close Maryland Avenue to vehicular access, resulting in a decline in LOS for five intersections and an improved LOS for two intersections. Therefore, there would be long-term minor adverse impacts. There would be short- and long-term minor adverse cumulative impacts. | Alternative 3 would close Maryland Avenue to vehicular access, resulting in a decline in LOS for five intersections and an improved LOS for two intersections. Therefore, there would be long-term minor adverse impacts. There would be short- and long-term minor adverse cumulative impacts. |

| Impact Topic | No Action Alternative | Alternative 1: Maryland Roadway | Alternative 2: Maryland Promenade | Alternative 3: Maryland Park/Tapestry |
|-------------------------|------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Transportation: Parking | Parking would continue to be provided on-site. Therefore, there would be no impacts. | Parking on-site would be removed, forcing people to park elsewhere. Motorists would be able to find spaces within a 1-block radius of the site would be available. Therefore, long-term adverse impacts would be minor. There would be short-term moderate adverse and long-term minor adverse cumulative impacts. | Parking on-site would be removed, forcing people to park elsewhere. Motorists would be able to find spaces within a 1-block radius of the site. Therefore, long-term adverse impacts would be minor. There would be short-term moderate adverse and long-term minor adverse cumulative impacts. | Parking on-site would be removed, forcing people to park elsewhere. Motorists would be able to find spaces within a 1-block radius of the site. Therefore, long-term adverse impacts would be minor. There would be short-term moderate adverse and long-term minor adverse cumulative impacts. |
| Vegetation | No vegetation would be removed or changed under the No Action Alternative. Therefore, there would be no impacts. | Alternative 1 would remove existing trees, grassed areas, and existing landscape plants and install more trees than currently exist at the site. On-site drainage and soil improvements would lead to healthier, fuller trees. Therefore, there would be beneficial impacts. There would be long-term beneficial cumulative impacts. | Alternative 2 would remove existing trees, grassed areas, and existing landscape plants and install more trees and landscape plants than currently exist at the site. On-site drainage and soil improvements would lead to healthier, fuller trees. Therefore, there would be beneficial impacts. There would be long-term beneficial cumulative impacts. | Alternative 3 would remove existing trees, grassed areas, and existing landscape plants and install more trees and landscape plants than currently exist at the site. On-site drainage and soil improvements would lead to healthier, fuller trees. Therefore, there would be beneficial impacts. There would be long-term beneficial cumulative impacts. |

| Impact Topic | No Action Alternative | Alternative 1: Maryland Roadway | Alternative 2: Maryland Promenade | Alternative 3: Maryland Park/Tapestry |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Visitor Use and Experience | <p>Gardeners would continue to use the community garden at the site. The exercise equipment would remain available for use. Visitors would be able to use the open areas and plaza. Therefore, there would be no impacts.</p> | <p>Alternative 1 would offer visitors a contemplative educational opportunity to learn about Eisenhower. Minimal services would be available on-site. Community gardeners and those using the exercise equipment would no longer be accommodated at the site. Alternative 1 would provide seating and shelter to visitors, as well as more shaded areas than the existing site. Pedestrian connections and bicycle racks would be available. Therefore, there would be long-term beneficial impacts. There would be short-term moderate adverse impacts and long-term beneficial cumulative impacts.</p> | <p>Alternative 2 would offer visitors a contemplative educational opportunity to learn about Eisenhower. Minimal services would be available on-site. Community gardeners and those using the exercise equipment would no longer be accommodated at the site. Alternative 2 would provide seating and shelter to visitors, as well as more shaded areas than the existing site. Pedestrian connections and bicycle racks would be available. Therefore, there would be long-term beneficial impacts. There would be short-term moderate adverse impacts and long-term beneficial cumulative impacts.</p> | <p>Alternative 3 would offer visitors a contemplative educational opportunity to learn about Eisenhower. Minimal services would be available on-site. Community gardeners and those using the exercise equipment would no longer be accommodated at the site. Alternative 3 would provide seating and shelter to visitors, as well as more shaded areas than the existing site. Pedestrian connections and bicycle racks would be available. Therefore, there would be long-term beneficial impacts. There would be short-term moderate adverse impacts and long-term beneficial cumulative impacts.</p> |

| Impact Topic | No Action Alternative | Alternative 1: Maryland Roadway | Alternative 2: Maryland Promenade | Alternative 3: Maryland Park/Tapestry |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Water Resources | No changes to the impervious surfaces would occur, resulting in no change in stormwater management or groundwater. Therefore, there would be no impacts to water resources. | The amount of impervious surface at the site would increase slightly. The amount of stormwater managed on-site would increase to pre-development levels, some of which would be reused for water features and/or toilet flushing. Groundwater recharge would be negligibly affected by the small amount of new impervious surface. Therefore, there would be beneficial impacts. There would be short-term minor adverse and long-term beneficial cumulative impacts. | The amount of impervious surface at the site would decrease. The amount of stormwater managed on-site would increase to pre-development levels, some of which would be reused for water features and/or toilet flushing. Groundwater recharge would be slightly improved as a result of less impervious surface. Therefore, there would be beneficial impacts. There would be short-term minor adverse and long-term beneficial cumulative impacts. | The amount of impervious surface at the site would decrease. The amount of stormwater managed on-site would increase to pre-development levels, some of which would be reused for water features and/or toilet flushing. Groundwater recharge would be slightly improved as a result of less impervious surface. Therefore, there would be beneficial impacts. There would be short-term minor adverse and long-term beneficial cumulative impacts. |