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The United States
World War One
Centennial Commission



World War I Memorial **Environmental Assessment**

National Mall and Memorial Parks
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Note

On December 19, 2014, Congress enacted Public Law 113-291, Section 3091, which officially re-designated Pershing Park as a “World War I Memorial.” In this document, the “World War I Memorial site” is used when generally describing the site and its existing components. However, “Pershing Park” is used in this document in reference to the historic resource, its contributing features, and effects on this historic resource.

Public Law 113-291, Section 3091 references the “General Pershing Commemorative Work,” defined as “the memorial to the late John J. Pershing.” In this document, “General Pershing Commemorative Work” is used to reference the statue of General John J. Pershing, the two flanking granite walls, the bench, and the plaza of the commemorative work as a whole, except in the description of historic resources and their contributing features and effects on these historic resources. In these descriptions, the specific terminology from the resource’s historic documentation is used to refer to the General Pershing Commemorative Work or its features.

Purpose and Need

Introduction

The National Park Service (NPS) and the World War I Centennial Commission (WWICC), in cooperation with the National Capital Planning Commission (NCPC), propose to enhance the former Pershing Park as a national World War I Memorial. The World War I Memorial site is bound by Pennsylvania Avenue NW to the north and south, 14th Street NW to the east, and 15th Street NW to the west (all streets referenced in this document are NW unless otherwise specified).

The proposed enhancements include the following elements:

- Replace the existing cascade fountain
- Insert a commemorative sculpture
- Modify the existing pool basin, including insertion of walkway
- Remove the circular metal and plastic kiosk
- Modify, replace, or remove vegetation
- Repair, modify, replace, or remove hardscape
- Improve accessibility
- Identify opportunities for interpretation

This Environmental Assessment (EA) describes two alternatives for the World War I Memorial site's enhancement, including one action alternative and a no-action alternative, and analyzes the environmental consequences of implementing each alternative. This document has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA); regulations of the Council for Environmental Quality (40 CFR 1500-1508); NPS Director's Order #12: *Conservation Planning, Environmental Impact Analysis, and Decision-Making*; the NPS NEPA Handbook (NPS 2015); and NCPC's NEPA Regulations (NCPC 2017).

Purpose and Need for the Action

Purpose

The purpose of the World War I Memorial is to further honor the service members of the U.S. Armed Forces in World War I by enhancing the General John J. Pershing Commemorative Work as a national World War I Memorial by constructing appropriate sculptural and commemorative elements, including landscaping as provided within Public Law 113-291.

Need

The Memorial is needed to fulfill the Congressional mandate for the establishment of a national World War I Memorial at the former Pershing Park.

Project Area

The World War I Memorial site is a 1.75 acre park set within a two-acre trapezoidal site located one block to the southeast of the White House and is bounded by Pennsylvania Avenue NW to both the north and south, and 15th Street NW and 14th Street NW to the west and east, respectively (**Figure 1**).

The site contains the following elements (**Figure 2**):

- The General Pershing Commemorative Work is located at the southeast corner of the project site and is a contributing object to the Pennsylvania Avenue National Historic Site (NHS). The Commemorative Work includes an eight-foot-tall bronze statue of General John J. Pershing on a base and a bench to the west. Two perpendicular granite walls flank the statue to the east and south. The walls are inscribed with a commendation by General John J. Pershing of the valor of his troops, maps of the Western Front, and history of the Meuse-Argonne Offensive.

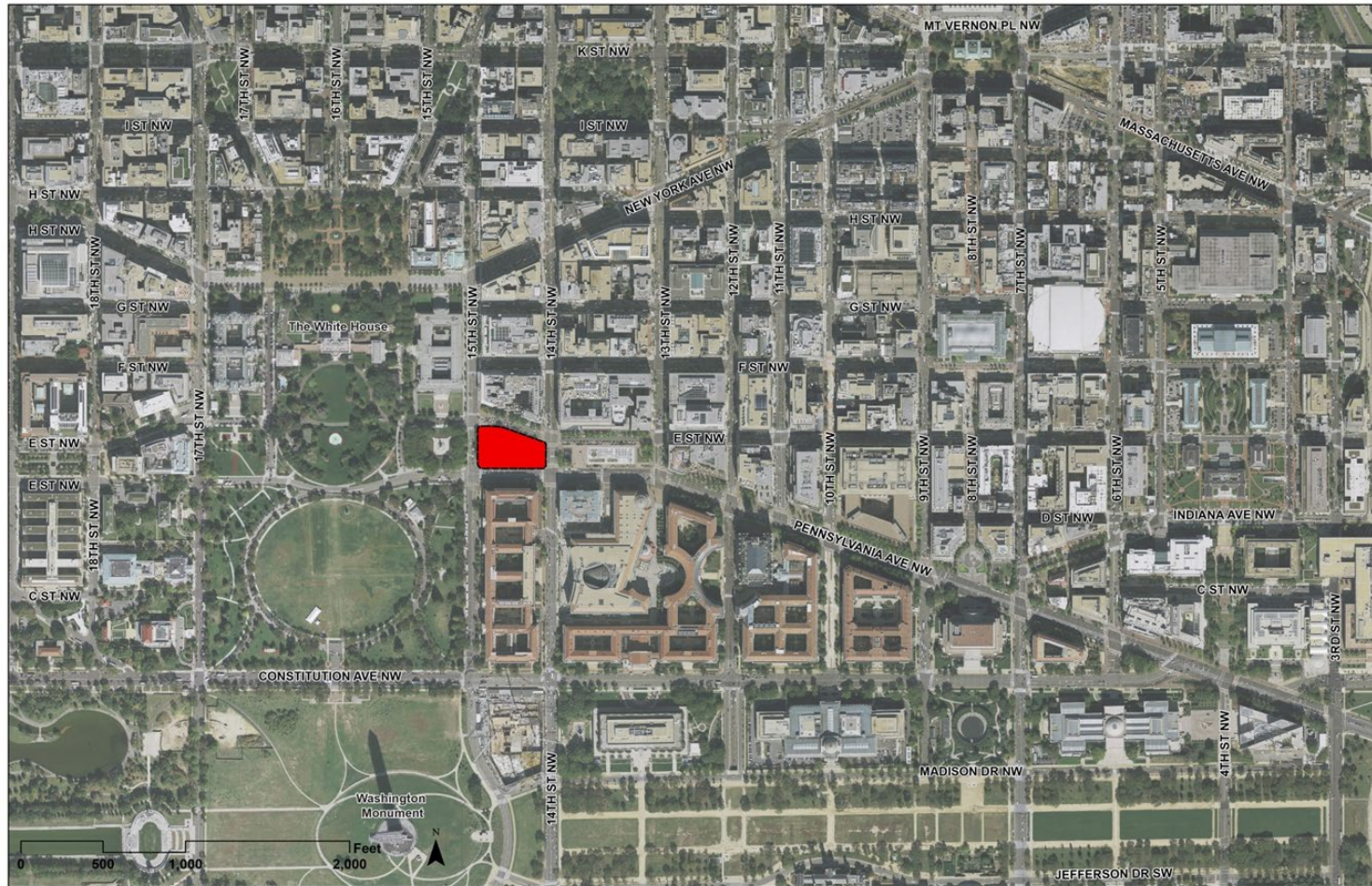


Figure 1: Location of the World War I Memorial site



Figure 2: Photos of the World War I Memorial site

Top Left: Existing view from the southeast corner. **Top Right:** General Pershing Commemorative Work. **Bottom Left:** Existing view looking southwest towards the pool basin and fountain. **Bottom Right:** Kiosk.

- A sunken pool basin is located at the center of the project site and is surrounded by granite steps creating amphitheater seating. The basin no longer functions as a pool. A granite cascade fountain is located at the western end of the basin, but is inoperable.
- A circular metal and plastic concession kiosk on a granite base is also located within the project site; it is no longer in operation.

The World War I Memorial site is located within an urban context. Hotels, office buildings, and the White House Visitor Center surround the site with the White House Grounds and Freedom Plaza, a hardscape/open space, located directly west and east of the park, respectively. The Pennsylvania Avenue NHS encompasses the entire World War I Memorial site.

Planning Issues and Concerns Retained for Detailed Analysis

Through the internal and public scoping process, the NPS, participating agencies and stakeholders, and the public identified the following issues and concerns to be retained for detailed analysis. These issues and concerns are included in the impact topics that are discussed in the “Affected Environment and Environmental Consequences” section of the EA.

The proposed project could introduce or change contributing features of the documented cultural landscapes and historic properties eligible for or within the National Register properties. Pershing Park is eligible for listing in the National Register of Historic Places (NRHP). The World War I Memorial site is also located in the Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape. The project’s potential impacts on

historic properties are analyzed in detail under the Cultural Landscapes section in this EA.

The proposed project would expand the commemorative area of the park. The expansion of commemorative elements and the alteration of seating and park elements could change how and what activities occur at the site. The project’s potential impacts are analyzed in detail under the Visitor Use and Experience section in this EA.

Planning Issues and Concerns Dismissed from Further Analysis

Some issues and concerns identified during scoping were considered by the WWICC and NPS, but were ultimately dismissed from detailed analysis because they were determined not central to the proposal or of critical importance. This section provides brief descriptions of the issues and concerns determined to not warrant further consideration, as well as a brief justification for the dismissal of each issue.

Potential for the project to impact threatened and endangered species and common species of wildlife.

Wildlife in the project area is limited to urban species, including grey squirrels (*Sciurus carolinensis*), house sparrows (*Passer domesticus*), rodents, pigeons (*C. livia*), and other types of wildlife consistent with urban areas. These species could be temporarily dispersed during construction. However, urban wildlife would be expected to return to the project area once construction is complete.

Potential for the project to impact historic buildings and structures. Historic buildings and structures partially or entirely within in the Area of Potential Effect (APE) include the L’Enfant Plan of the City of Washington, the Pennsylvania Avenue NHS, the Federal Triangle Historic District (HD), the

Fifteenth Street Financial HD, the Lafayette Square HD, and several other individual historic properties.

The L'Enfant Plan of the City of Washington contains reservations, avenues, streets, and vistas that contribute to the L'Enfant Plan's NRHP listing, including Pennsylvania Avenue NW and the Pennsylvania Avenue corridor vista. The World War I Memorial Site is located on Reservation 617, which also contributes to the L'Enfant Plan. The proposed action would retain the use of the project site as a park, the existing boundary and street trees, the continuity of Pennsylvania Avenue, and the designed views through the Pennsylvania Avenue corridor.

The Pennsylvania Avenue NHS encompasses the entire World War I Memorial site and part of the APE. Within the site, contributing features to the Pennsylvania Avenue NHS's NRHP listing include the General John J. Pershing Memorial and the vista along Pennsylvania Avenue NW to the U.S. Capitol. The project would avoid changes to these contributing features. For these reasons, historic buildings and structures were dismissed from detailed analysis.

Potential for the project to impact archeological resources. The topic of archeological resources was dismissed from detailed analysis because the ground has already been disturbed. The construction of Pershing Park, which opened in 1981, required excavation of much of the park (NPS 2016, Robinson & Associates, Inc. and Commonwealth Heritage Group 2016). Additionally, the action alternative does not propose further excavation. Therefore, the topic was dismissed from detailed analysis.

Potential for the project to impact 100-year floodplains. The project is not located within the 100-year floodplain. Therefore, the topic was dismissed from detailed analysis.

Potential for the project to impact vegetation. Existing vegetation on the project site includes honey locust trees (*Gleditsia tricanthos inermis*), willow oak trees (*Quercus phellos*), northern red oak trees (*Quercus rubra*), crape myrtle trees (*Lagerstroemia indica*), river birch trees (*Betula nigra*), English ivy (*Hedera helix*), and others. The project site currently contains 117 total trees. Some of the honey locust, river birch, and willow oak trees are in poor condition (GWWO, Inc./Architects 2017). Existing vegetation suffers from dieback, poor soil conditions, or conflicts with infrastructure and utilities.

The action alternative analyzed in the EA proposes to increase the number of trees by approximately six or decrease the number of trees by approximately two, depending on the sculpture option, compared to the existing number of trees. Trees would be replaced with the same species or a compatible species or cultivars. Understory plantings would be replaced with compatible vegetation. Native and naturalized grasses and flowering plants would be replaced in kind or with plants of similar ornamental characteristics. The altered configuration of planting beds, amended soils within planting areas, and improved plant spacing would maximize long-term viability of vegetation.

Given the size and urban context of the project area, the small increase or reduction in the number of trees, the replacement of trees and vegetation in-kind or with compatible species, cultivars, or vegetation, and soil improvement strategies would not result in significant adverse impacts on vegetation. For these reasons, vegetation was dismissed from further analysis in the EA.

Alternatives

This EA documents the analysis of environmental consequences of two alternatives. The elements of these alternatives are described in detail in this chapter. Impacts associated with the actions proposed under each alternative are outlined in the “Affected Environment and Environmental Consequences” chapter of the EA. In addition, several concepts for the proposed World War I Memorial were dismissed from further consideration. These concepts are described in this chapter under “Alternatives Considered but Dismissed.”

Alternative A: No-Action

The No-Action Alternative proposes to retain the World War I Memorial site’s existing elements in their current condition. The existing management practices at the site would continue.

Circulation and Access

The No-Action Alternative would retain the site’s existing circulation and access (see **Figure 3**). Entry to the interior of the site would continue at the four corners of the site and from the length of Pennsylvania Avenue NW along the north side. A set of steps at the southwest and southeast corners would continue to lead to an upper terrace. Accessible entry would continue to be available at the northwest corner and along Pennsylvania Avenue NW on the northern perimeter of the site.

Elevated walks would continue to be located along the south and west sides of the upper terrace. The General Pershing Commemorative Work would remain connected to the other site spaces with steps to the north and west. An accessible ramp would continue to connect the General Pershing Commemorative Work with the south side of the upper terrace. An additional accessible ramp would continue to

connect the eastern edge of the General Pershing Commemorative Work with the tree grove along Pennsylvania Avenue NW.

An accessible ramp would also remain located around the circular metal and plastic kiosk.

General Pershing Commemorative Work

The No-Action Alternative would retain the General Pershing Commemorative Work in its current location. Located at the southeast corner of the site, the General Pershing Commemorative Work consists of a bronze statue of General John J. Pershing by sculptor Robert W. White flanked by two granite walls to the south and east and a bench to the west. The walls separate the statue from the street and are inscribed with maps and quotes. The Commemorative Work’s plaza is composed of square granite paving, which is currently in need of repair.

Cascade Fountain and Pool Basin

The inoperable granite cascade fountain would remain in its current location at the western end of the rectilinear sunken pool basin. The granite planters and granite steps creating amphitheater seating around the pool basin would also remain. No repairs to the inoperable pool would be made.

Vegetation

The No-Action Alternative would retain the following vegetation:

- Rows of honey locust trees on the east, south, and west grass-covered berms
- Crape myrtle trees in the alcoves along the elevated walks
- Existing Pennsylvania Avenue street trees (willow oaks) lining the north perimeter of the site, including the willow

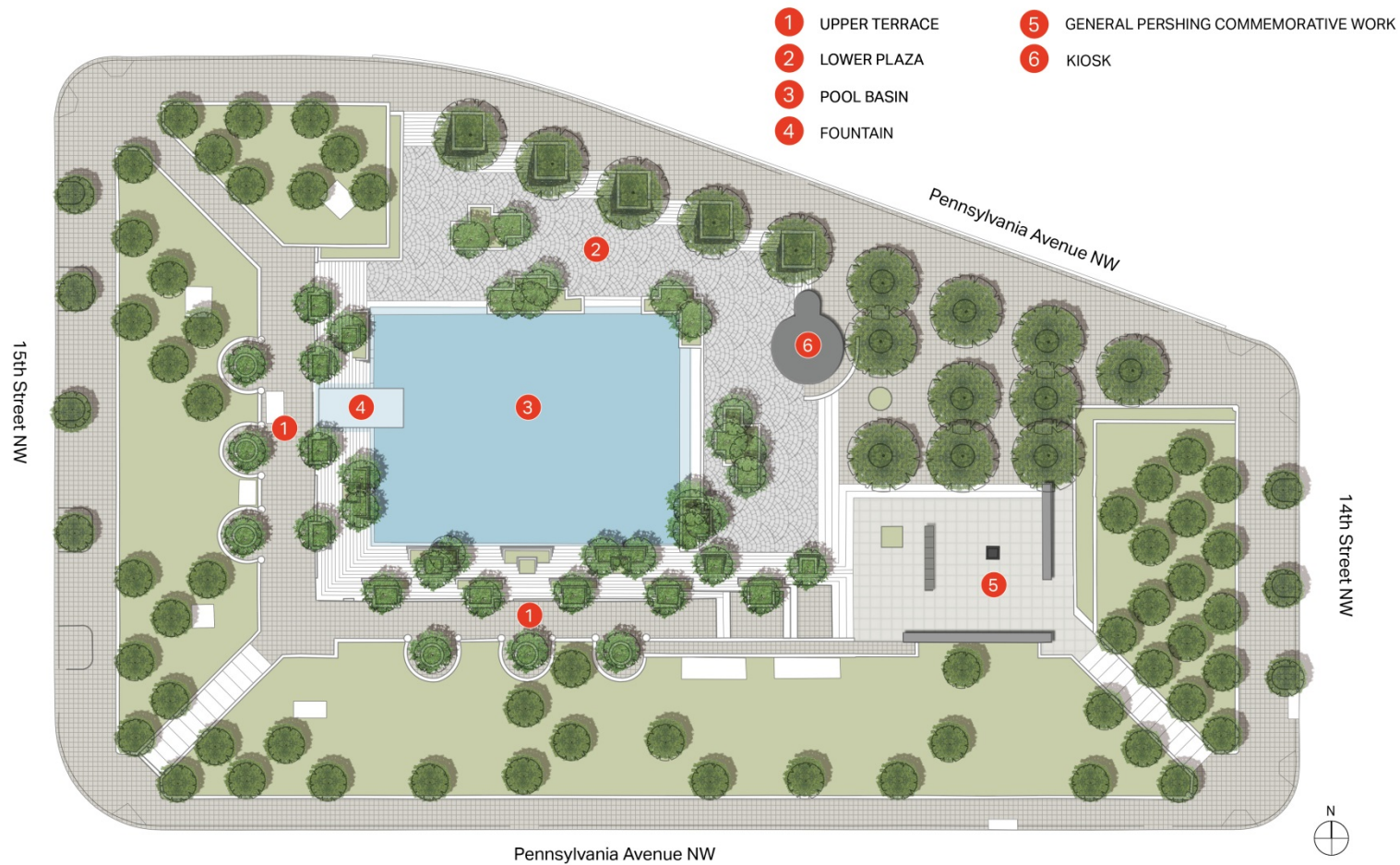


Figure 3: Site Plan of World War I Memorial Site Existing Conditions

oaks creating a bosque of trees within the paving at the northeast corner of the site and the willow oaks in planters with English Ivy ground cover along Pennsylvania Avenue NW

- Crape myrtles with ground cover at their bases
- River birch trees surrounding the pool basin
- Native and naturalized grasses and perennial flowering plants

Vegetation originally included in the Oehme van Sweden planting plan but subsequently removed due to plant health or park maintenance would not be replaced.

Other Built and Small-Scale Features

The circular metal and plastic kiosk on a granite base, Bex Eagle, granite trash can enclosures, and drinking fountains would remain in their current locations

Alternative B: Action Alternative

The Action Alternative proposes to remove the existing cascade fountain and kiosk and add a commemorative sculpture that includes a fountain, a walkway through the pool, and an elevated interpretive area, referred to as the belvedere. The Action Alternative also proposes to modify vegetation and remove small-scale features: the granite trash enclosures and the drinking fountains. These elements are described below. The design options for the sculpture and fountain are described as the Integrated Sculpture Option (see **Figure 4**) and the Freestanding Sculpture Option (see **Figure 5**). The design options for the walkway are identified as the L Walkway and Island Walkway Options (illustrated in **Figure 4** and **Figure 5**, respectively).

Circulation and Access

The Action Alternative would retain the site's existing circulation framework and access with minor modifications to improve universal accessibility. The four corners of the site and the length of Pennsylvania Avenue NW along the north side of the site would continue to provide access into the interior of the site. The General Pershing Commemorative Work would continue to connect to the other site spaces with steps to the north and west and two accessible ramps. The width of the accessible ramp connecting to the south side of the upper terrace would be widened to the south to meet code requirements. The width of the accessible ramp connecting with the tree grove along Pennsylvania Avenue NW would be widened to the east. The length of the ramp would also be extended and the ramp's slope would be reduced to meet code requirements for accessibility.

General Pershing Commemorative Work

The Action Alternative would retain the General Pershing Commemorative Work in its current condition and location. The statue of General John J. Pershing would continue to be flanked by the two granite walls to the south and east and a bench to the west.

Commemorative Sculpture Fountain

Integrated Sculpture Option

The Integrated Sculpture Option proposes to replace the existing cascade fountain, portions of the western steps leading to the pool, and the two lower and two upper granite planters on the western edge of the pool with an integrated 56.5-foot long commemorative work, including cascade fountain (see **Figure 4**).

The fountain would be sourced from a pool on the top of the commemorative work and cascade over the north and south



Figure 4: Alternative B: Action Alternative, Integrated Sculpture Option with L Walkway

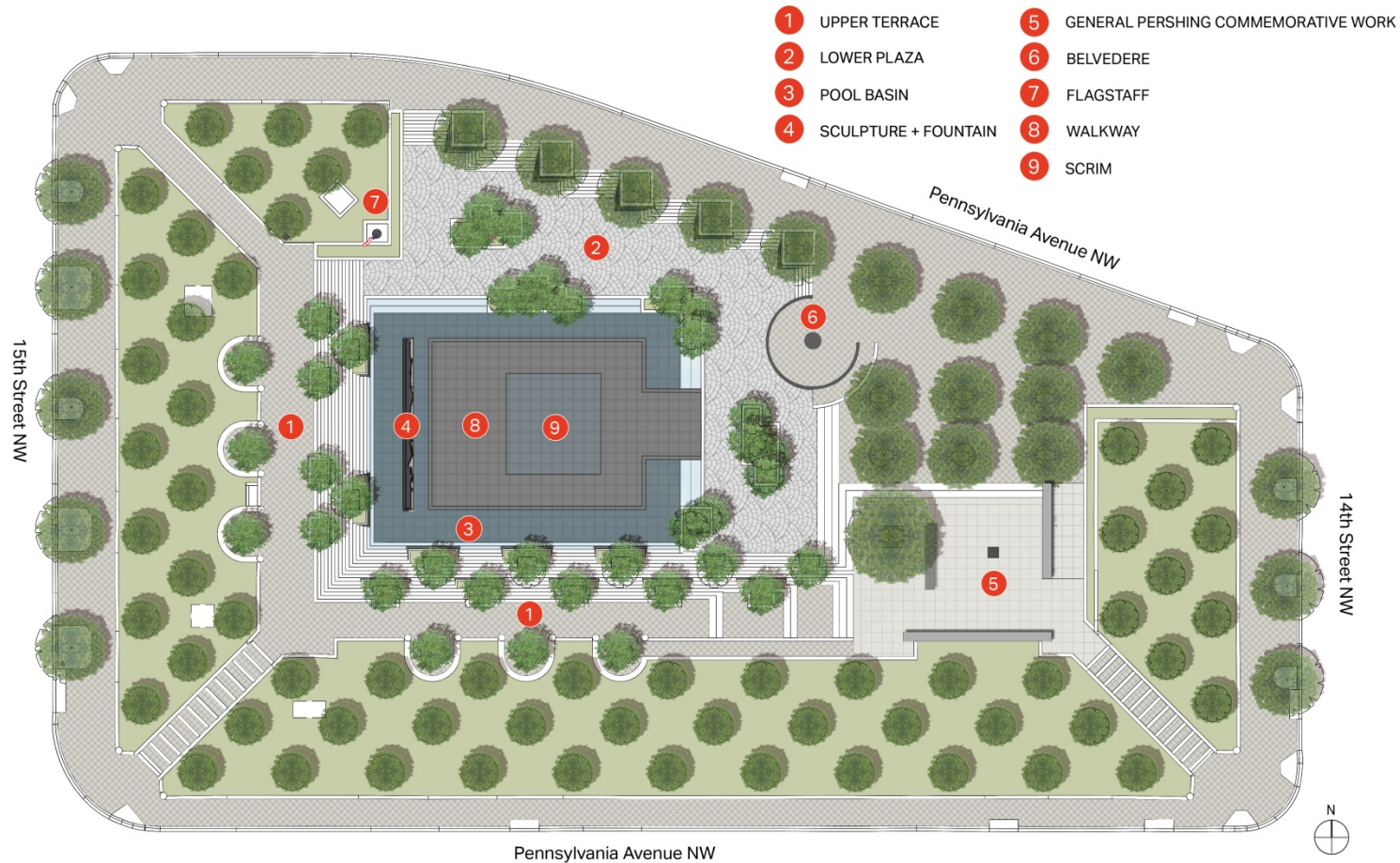


Figure 5: Alternative B: Action Alternative, Freestanding Sculpture Option with Island Walkway

faces of the commemorative work and back into runnels at the base which bring the water down to the pool in a manner consistent with the existing source fountain. The eastern face of the commemorative work would include high relief sculpture with a fountain below.

An overlook would be provided on the western side of the commemorative work along the elevated upper terrace, which would include seating. The number of granite planters at the western edge of the pool would be reduced from six to two planters. The semi-circular seating to the west of the walkway would shift to align with the sculpture and planters.

Freestanding Sculpture Option

The Freestanding Sculpture Option proposes to remove the existing cascade fountain and extend the granite steps through the former fountain structure location (see **Figure 5**). The six granite planters on the western edge of the pool would shift to align with the sculpture fountain. A freestanding 56.5-foot long commemorative sculpture fountain, would be inserted into the pool between the pool's western edge and the proposed walkway. The eastern face of the commemorative sculpture would include a high relief sculpture with a fountain below, while the western face would include an etched quotation and a full height cascade fountain. Water would flow from the top of the sculpture fountain and cascade over the west face down to the pool to generate a sound and a cooling effect in a manner consistent with the original design of the historic fountain. The semi-circular seating to the west of the walkway would remain in place.

Walkway and Pool

The Action Alternative calls for modifications to the existing pool basin to accommodate a walkway through the water, which would allow visitors to view the

commemorative sculpture fountain more closely. The basin's existing concrete material would be replaced by dark granite. The walkway across the pool would be the same dark granite material; the walkway may be elevated slightly above the water or coplanar with the water surface. The walkway and pool would be in one of two possible configurations.

L Walkway Option

An L-shaped walkway would be placed near the southern and western portions of the pool with entry points at both the east and north sides of the pool (see **Figure 4**). The walkway would rest on top of portions of the first step of the granite steps along the north and east edges of the pool. The granite planters located around the pool would remain intact to the north, south, and east of the pool. The tree planter to the east of the pool on the lower plaza would be modified to accommodate the walkway. The pool basin would contain water at a depth of approximately 16 inches.

Island Walkway Option

The island walkway would extend along the southern, northern, and western portions of the pool with a central entry point at the east side of the pool (see **Figure 5**). The tree planters at the eastern edge of the pool and one tree planter to the east of the pool on the lower plaza would be modified to accommodate the walkway.

The island walkway would enclose a scrim of water, 0.25 inches in depth, and set to be coplanar with the walkway itself. The exterior perimeter of the pool basin, along the pool edges would contain water at a depth of approximately 16 inches.

Vegetation

The rows of honey locust trees within the east, south, and west berms would be replaced in-kind. The proposed planting plan would retain the gridded planting arrangement of the honey locust trees shown in the Oehme van Sweden planting plan, but reduce the total number of trees from the Oehme van Sweden planting plan by approximately 34 trees (Freestanding Sculpture Option) or approximately 37 trees (Integrated Sculpture Option) to provide larger soil volumes for each tree. The lawn on the berms would be replaced with understory plantings similar in character to the plants specified in the original Oehme van Sweden planting plan. Pennsylvania sedge (*Carex pensylvanica*) with red poppies (*Papaver orientale*) planted on the south berm and the southern portions of the east and west berms. White astilbe (*Astilbe x arendsii* 'Deutschland'), white liriopie (*Liriope muscari* 'Monroe's White'), and snowdrops (*Galanthus*) would be planted in the berm areas adjacent to the northwest, southwest, and southeast entrances to the site.

Pink crape myrtles (*Lagerstroemia indica*) in the alcoves along the elevated walks would be replaced with white crape myrtles (*Lagerstroemia indica x fauriei* 'Natchez'). The total number of crape myrtles would be retained.

New willow oaks would replace in-kind the existing Pennsylvania Avenue street trees that are in poor condition. With the exception of one tree, which would be removed and not replaced, willow oaks located at the northeast corner of the park would also be replaced in-kind as needed. The total number of willow oaks would be retained. Willow oaks in planters with English Ivy ground cover located along Pennsylvania Avenue would be replaced in-kind as needed; the number of willow oaks would be retained. The existing planter understory

would be replaced with Asian ginger (*Asarum splendens*) and Japanese anemone (*Anemone hupehensis* var. *japonica* 'Honorine Jobert').

White crape myrtles would replace pink crape myrtles with ground cover at their bases; a fountain grass (*Pennisetum alopecuroides*) understory would replace the existing ground cover within the terrace step planters. Sweetbay magnolias (*Magnolia virginiana*) with a white liriopie (*Liriope muscari* 'Monroe's White') understory would replace the river birches in planters throughout the lower plaza. In both cases, the Action Alternative proposes to reduce the number of trees in order to provide larger soil volumes for each tree. The total number of trees at these locations would be reduced from the Oehme van Sweden planting plan by approximately 12 trees (Freestanding Sculpture Option) or 16 trees (Integrated Sculpture Option).

The existing 14th Street NW and 15th Street NW northern red oak street trees would be replaced in-kind. One missing northern red oak from the site's original canopy would be restored.

The site of the missing copper beech (*Fagus sylvatica*) at the General Pershing Commemorative Work would be replaced with a Jefferson elm (*Ulmus americana* 'Jefferson').

Native and naturalized grasses and perennial flowering plants would be replaced in-kind or with plants of similar ornamental characteristics as described above.

The soils would be amended within the planting areas, including planters to improve the long-term viability of the trees.

Other Built and Small-Scale Features

The Action Alternative proposes to replace the circular metal and plastic kiosk with an elevated interpretive overlook (referred to as the belvedere), which would offer a semi-enclosed area from which to view the park. The design would remove the elevator form associated with the kiosk, remove and replace the existing wall with a larger footprint to accommodate an accessible ramp, and install a new stone cap.

The Bex Eagle would remain in its current location. The Action Alternative also calls for the removal of the granite trash enclosures and replacement of the drinking fountains.

A flagstaff would be placed in the northwest berm, near the edge of the existing wall bordering the amphitheater-style steps. The face of the eastern existing wall of the northwest berm would include an etched quotation. A door would be added to the southern wall of the northwest berm to provide access to below grade spaces. The eastern and southern edges of the northwest berm would be elevated to accommodate access to below grade spaces.

The project would follow applicable stormwater requirements listed in the District of Columbia's 2013 Rule on Stormwater Management and Soil Erosion and Sediment Control and the federal Energy Independence and Security Act (EISA). Because the project exceeds 5,000 square feet, the project would use appropriate site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to temperature, rate, volume, and duration of flow. The memorial would include stormwater management, soil erosion, and sediment controls.

Alternatives Considered but Dismissed

NPS considered a wide range of alternatives for the proposed Memorial during the design process, including five initial designs selected by the memorial design competition jury. Some alternatives were ultimately dismissed from further consideration. A description of these alternatives is provided in **Appendix A**.

Affected Environment and Environmental Consequences

This chapter describes current environmental conditions in and surrounding the project area. This discussion is focused on resources that could potentially be affected by the implementation of the proposed project and provides a baseline for understanding the current condition of the resources. The chapter also includes an analysis of the environmental consequences, or “impacts,” of the no-action and action alternatives.

The affected environment description is followed by the environmental consequences analysis for each resource topic. The resource topics analyzed here correspond to the planning issues and concerns described in the “Purpose and Need” section of this EA.

In accordance with the Council on Environmental Quality (CEQ) regulations, the environmental consequences analysis includes the direct, indirect, and cumulative impacts potentially resulting from the proposed alternatives (40 CFR 1502.16). For the purposes of this document, impacts are direct unless otherwise noted. The intensity of the impacts is assessed in the context of the World War I Memorial site’s purpose and significance, and any resource-specific context that may be applicable (40 CFR 1508.27). Where appropriate,

mitigating measures for adverse impacts are described and their effect on the severity of the impact is noted. The methods used to assess impacts vary depending on the resource being considered, but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

As required by the CEQ regulations implementing NEPA, a summary of the environmental consequences for each alternative is provided in **Table 4** at the end of this section.

Cumulative Impacts Methodology: The EA also considers cumulative impacts – defined as the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions (40 CFR 1508.7). Cumulative impacts are addressed in this EA by resource topic for both the action and no-action alternatives. To determine the potential cumulative impacts, past, current, and anticipated future projects within the World War I Memorial site and in the surrounding area were identified. These cumulative projects are summarized in **Table 1**.

Table 1: Cumulative Impact Projects

Past, Present or Future	Project	Description
Past / Present	American Battle Monuments Commission (ABMC) Improvements to the General Pershing Commemorative Work	The ABMC's commemorative mission includes maintaining U.S. military memorials where American armed forces have served overseas since April 6, 1917. The ABMC recently cleaned and repaired the engraved inscriptions on the two granite walls flanking the General John J. Pershing statue to enhance their visibility and repair the Commemorative Work's plaza. This change would potentially result in impacts on cultural landscapes and visitor use and experience.
Past / Present/ Future	Herbert C. Hoover Building Site Improvements and Perimeter Security	The General Services Administration is currently undertaking a renovation of the Herbert C. Hoover Building, the headquarters of the U.S. Department of Commerce, located at 1401 Constitution Avenue NW. The building is located directly south and across Pennsylvania Avenue NW from the World War I Memorial site. The project includes a complete renovation of the existing Herbert C. Hoover Building, upgrades to the mechanical, electrical, plumbing, and fire and life safety systems, and perimeter security improvements. Construction of the renovation project began in November 2017 and includes eight phases through 2021. This change would potentially result in impacts on cultural landscapes and visitor use and experience.

Past, Present or Future	Project	Description
Past / Present / Future	Pennsylvania Avenue NHS 2014 Management Plan	<p>The NPS National Mall and Memorial Parks (NAMA) unit prepared a Management Plan for the Pennsylvania Avenue NHS in 2014 to establish a vision for the protection, use, and management of Pennsylvania Avenue NHS and provide actions to address problems and concerns and to take advantage of opportunities.</p> <p>The Management Plan includes general actions related to management and jurisdiction, cultural resources, special events, access and circulation, urban design character, visitor information, education and enjoyment, visitor facilities and services, health, public safety, and security, and operations. The Management Plan also includes specific area actions for Pershing Park (now known as the World War I Memorial site) and Freedom Plaza located directly east of Pershing Park. Actions specific to Pershing Park include:</p> <ul style="list-style-type: none"> ▪ Rehabilitate the park to reestablish it as a pleasant oasis in the city; improve visual access across the site. Coordinate the rehabilitation with the redesign of Freedom Plaza. ▪ Provide additional interpretation about World War I and General Pershing; strengthen the park's identity as the National World War I Memorial in the capital city. ▪ Develop stronger physical connections between commercial uses and across Pennsylvania Avenue North. ▪ Consider additional floral displays. ▪ Replace the concrete picnic tables with street furnishings compatible with updated special streetscape guidelines. ▪ Modify, as needed, regulations related to the location of Inaugural Parade facilities. <p>This change would potentially result in impacts on cultural landscapes and visitor use and experience.</p>
Present/Future	NCPC Pennsylvania Avenue Initiative	<p>NCPC has coordinated to develop an initiative to shape a future vision for Pennsylvania Avenue and its role in the capital city. The document strategies include short-, mid-, and long-term activities to improve the Avenue by celebrating the Avenue's civic role, developing the Avenue's vital urban area, reinvigorating the Avenue's circulation and mobility, and elevating the identity of the Avenue as a great destination. This change would potentially result in impacts on cultural landscapes and visitor use and experience.</p>

Cultural Landscapes

Section 106 of the National Historic Preservation Act (NHPA) requires that federal agencies consider the effects of their actions on historic properties, which are defined by the implementing regulations of the NHPA (36 CFR 800) as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP. Compliance with Section 106 of the NHPA is being conducted concurrently with the NEPA process for this project (see Appendix B). The NPS, in consultation with the DC State Historic Preservation Office (SHPO), identified historic properties within the project's area of potential effect (APE). As defined by 36 CFR 800.16(d), the APE represents "the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist." This project's APE encompasses Pershing Park (now known as the World War I Memorial site), which is eligible for listing in the NRHP as an individual site, and areas beyond the park's boundaries to the north, south, east, and west (**Figure 6**).

In this EA, the different types of historic properties are addressed by resource type to best describe the impacts of the proposed action on the park's physical resources. As a result, Pershing Park is addressed under Cultural Landscapes.

Affected Environment

Cultural landscapes consist of "a geographic area, including both natural and cultural resources, associated with a historic event, activity, or person" (NPS 1998). Cultural landscapes in the APE include Pershing Park and the Pennsylvania Avenue, NW – White House to the Capitol. These are described in detail in the NRHP

Determination of Eligibility for Pershing Park (2016) and the Cultural Landscapes Inventory (CLI) for Pennsylvania Avenue, NW - White House to the Capitol (2016).

Cultural landscapes include the features and systems that compose the existing landscape and convey the historic character of the landscape associated with a historic period of significance. Landscapes provide a setting for historic buildings and structures. Cultural landscape characteristics include natural systems and features, topography, spatial organization, vegetation, land use, circulation, views and vistas, buildings and structures, and small-scale features that contribute to the landscape's historic character.

Pershing Park

In July 2016, Pershing Park was determined to be eligible for listing in the NRHP as an individual designed landscape (Robinson & Associates, Inc. and Commonwealth Heritage Group 2016). The park is individually significant at a national level under NRHP Criterion A in the area of community planning and development as the site of the General John J. Pershing Memorial. Pershing Park is an example within a federal legislation pattern that designated commemoration of national important events and individuals in the federal park land in Washington, D.C.

Pershing Park is also significant at the national and state levels under Criterion C in the area of landscape architecture as a signature designed landscape by M. Paul Friedberg and as the first modernist commemorative park on one of the important elements of the nationally significant Washington city plan. Pershing Park's NRHP Determination of Eligibility identifies the following character-defining features in **Table 2**.

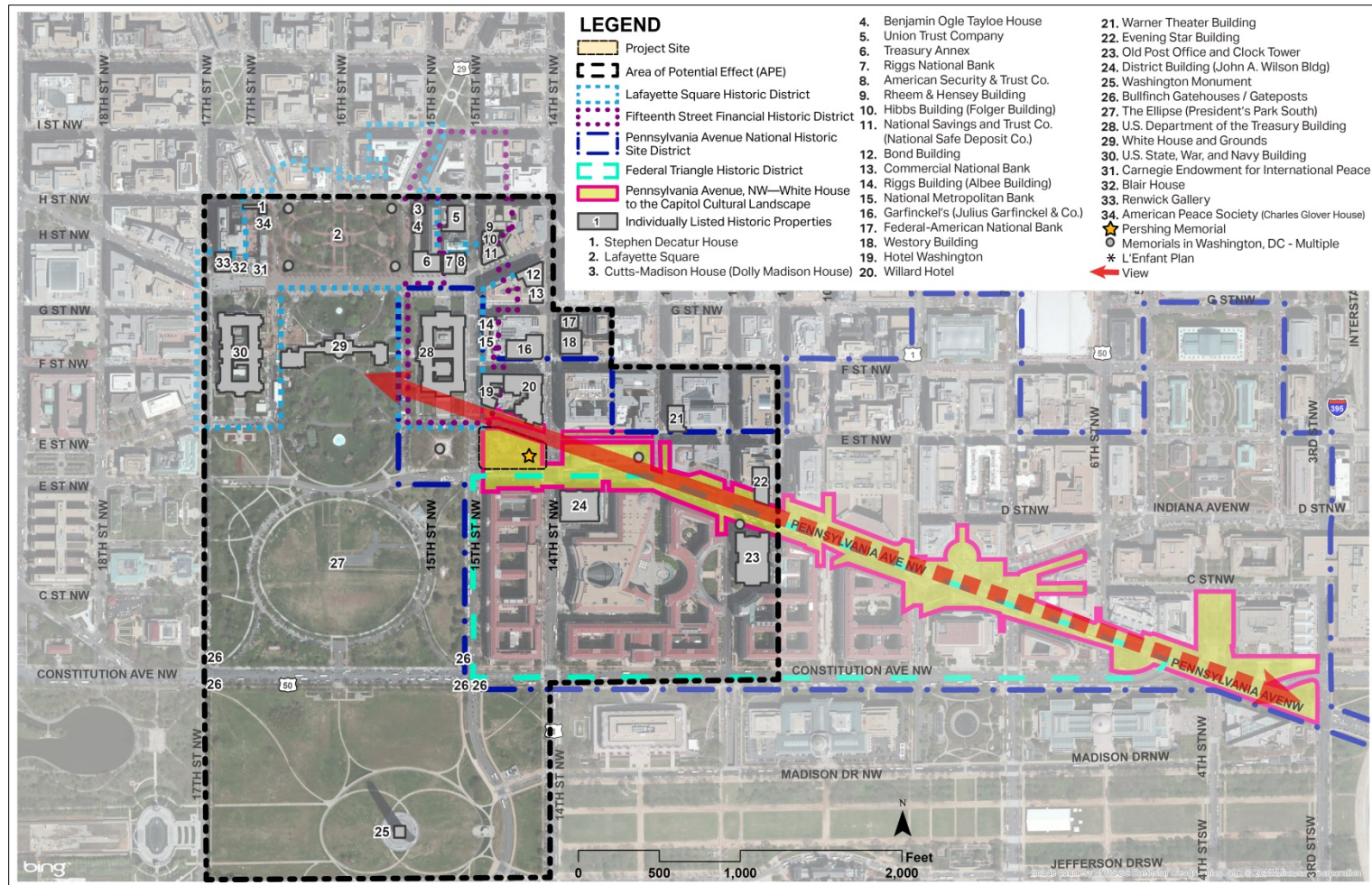


Figure 6: Area of Potential Effect

Table 2: Character-Defining Features of Pershing Park

Category	Character-Defining Feature
Spatial Organization	Design with a sunken pool at the center of the park, earthen berms on three sides, elevated walks on the south and west, and Pershing Memorial at the southeast corner
	Interior park access from the four corners of the site and from the length of Pennsylvania Avenue NW along the north side of the park
	Separation of Pershing Memorial from rest of park through the use of walls on the south and east, and loose connection to the other park spaces with steps on the north and west.
	Free flow of space between the activity zones
Views and Vistas	Omnidirectional views among the different levels of the park and among the character-defining features
Built Features	Paving
	Etched granite walls of the Pershing Memorial
	Alcoves and planters along elevated walks
	Granite planters in steps
	Granite steps creating amphitheater seating
	Granite cascade pool structure
	Circular metal and plastic kiosk on granite base
Water Features	Cascade fountain
	Pool fountain
Vegetation	Trees in planters, along elevated walks, and on berms (out of the 170 total trees in the Oehme van Sweden planting plan, 117 trees currently exist at the park)
Small-Scale Features	Statue of Pershing
	Light fixtures, and the granite trash can enclosures
	Drinking fountain
	Trash can enclosures

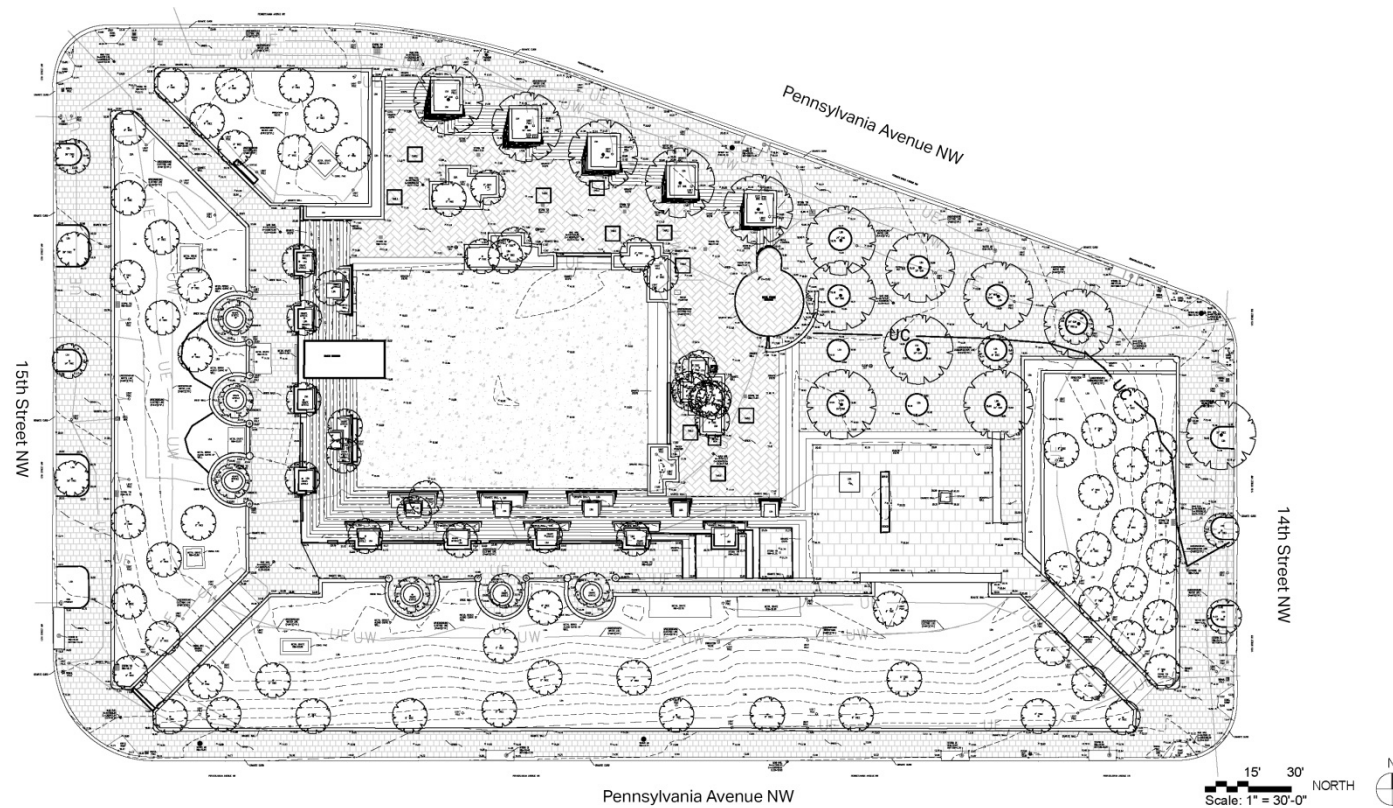


Figure 7: Survey of Existing Park Conditions

Pennsylvania Avenue, NW – White House to the Capitol

A CLI was completed by the NPS for Pennsylvania Avenue, NW - White House to the Capitol in 2016 (NPS 2016). This cultural landscape consists of NPS's property along Pennsylvania Avenue NW between 3rd and 15th Streets NW and is within the boundary of the Pennsylvania Avenue NHS, an administrative unit of National Mall and Memorial Parks. The CLI concluded that Pershing Park is a contributing feature to the cultural landscape and also documented other features present in Pershing Park and the APE that contribute to the landscape's significance (Table 3).

Table 3: Character-Defining Features of Pennsylvania Avenue, NW- White House to the Capitol Cultural Landscape

Category	Character-Defining Feature
Spatial Organization	Interface of Pennsylvania Avenue NW and Pershing Park
	Pennsylvania Avenue as an open channel of space running between two fixed points
	Expansion of channel into parks, including Pershing Park
Land Use	Commemoration, recreation, and transportation
Circulation	Sidewalk, including Pennsylvania Avenue Development Corporation (PADC) pavers
Vegetation	Willow oaks serving as street trees
Structures	General John J. Pershing Memorial and Bex eagle

Category	Character-Defining Feature
Views and Vistas	Axial view between Treasury Building and U.S. Capitol
Small-Scale Features	PADC streetlights and site furnishings

About the Analysis

Potential impacts on cultural landscapes affect the historic character and integrity of the landscape as defined in the Pershing Park's Determination of Eligibility and Pennsylvania Avenue's CLI. The impacts are analyzed based upon guidance provided in Section 106 of the NHPA and the *Secretary of Interior's Standards for the Treatment of Historic Properties*, as well as *A Guide to Cultural Landscape Reports*, DO-28 and other NPS guidance for the treatment of cultural landscapes.

A proposed action that results in a change that detracts from or destroys the historic character-defining features of cultural landscapes would be considered adverse. Likewise, any action that destroys or diminishes the landscape's integrity, in particular for setting, location, association, or feeling would result in an adverse impact. Actions that improve or enhance the historic character and integrity of the landscape – for example, through restoring lost historic features, such as views or vegetation patterns – would be a beneficial impact.

Direct impacts are those changes that result in detectable physical impacts on the landscape's historic character, such as major earthmoving or construction of new buildings and structures. Indirect impacts result in impacts on the landscape that do not directly alter its

physical character, but are noticeable, such as changes to views or noise levels due to increased visitor traffic.

The consideration of alternatives identifies the proposed actions that would result in physical changes or alterations in use that could modify the conditions of the landscape. The subsequent impacts on the condition, historic character, and integrity of cultural landscapes are weighed to identify whether they are detectable, and if so, whether they are adverse or beneficial.

As part of the Section 106 process, an Assessment of Effects has been prepared for the project and will be submitted to the DC SHPO for review and approval in conjunction with this EA.

Impacts of Alternative A: No-Action

Pershing Park

Under Alternative A, no changes would occur to Pershing Park's spatial organization, views and vistas, and land use. However, NAMA's current staffing and operations for Pershing Park have not been adequate for the maintenance of the park's existing resources. Continued deferred maintenance would have no noticeable changes on the park's circulation, built features, water features, vegetation, and small-scale features over the short term.

Over the long term, maintenance challenges would continue to diminish conditions of built features, including the leaking kiosk; water features, such as the cracked pool basin; vegetation needing removal or care; and small-scale features. These changes would result in detectable changes on these character-defining features. Therefore, Alternative A would result in long-term detectable adverse impacts on Pershing Park.

Pennsylvania Avenue, NW - White House to the Capitol Cultural Landscape

Under Alternative A, the interface of the memorial site and Pennsylvania Avenue, NW would remain, as would the memorial site's location and relation within the broader cultural landscape. The land uses of commemoration, recreation, and transportation within the site, as well as its circulation, would remain. Street trees, the General John J. Pershing Memorial and Bex eagle, and PADC streetlights and site furnishings would also remain. The axial view between the Treasury Building and the U.S. Capitol would not change. As a result, no long-term impact on the Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape would occur.

Cumulative Impacts: Other past, present, and reasonably foreseeable future projects that have or will likely have cumulative impacts on cultural landscapes include the ABMC's planned improvements to the General Pershing Commemorative Work and the Pennsylvania Avenue NHS 2014 Management Plan's specific area actions for Pershing Park. The ABMC's work to clean, repair, and enhance the visibility of the inscriptions on the Commemorative Work's granite walls and repair the plaza could have a detectable beneficial impact on the granite walls and paving, which are character-defining built features in the park. The Management Plan's specific area actions for Pershing Park could have no detectable, adverse, or beneficial impacts on the cultural landscapes depending on the actions implemented. Any changes to the cultural landscapes that result in impacts that are not detectable or beneficial, however, could experience deferred maintenance in the future. Therefore, when the adverse impacts of Alternative A are combined with the impacts of these other projects, an

overall adverse long-term cumulative impact would result.

Conclusion: Alternative A would result in long-term detectable adverse impacts on cultural landscapes and would contribute to adverse impacts on the overall adverse cumulative long-term impact on cultural landscapes.

Impacts of Alternative B: Action Alternative

Pershing Park

The proposed action would retain the spatial organization of the street and park interface. The basic outline of Pershing Park is shaped by city streets that would remain in place, along with the berms, park entrances, and the park edges (see **Figure 8**).

The General John J. Pershing Memorial statue and granite walls would not be altered.

Improved accessibility throughout the park would include the widening of the ramp near the kiosk, widening of the ramp along the southern portion of the park between the General John J. Pershing Memorial and the upper walkway, and the widening, extending the length, and reducing the slope of the ramp between the Pershing Memorial and the tree grove along Pennsylvania Avenue NW. These potential changes would be undertaken in a manner that is consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, and would not substantively alter the spatial organization or character-defining features of the park.

The Action Alternative would reinstate several of the site's missing functions and characteristics, while changing some of the character-defining features. The

pool basin footprint would be retained in both the Freestanding Sculpture and Integrated Sculpture Options (see **Figure 8** and **Figure 9**, respectively) and the pool would be repaired to be operational. The Action Alternative would replace the cascading water in the pool basin, which is currently dry.

The existing kiosk, one of the park's key focal points, would be replaced with an elevated interpretive overlook located on the circular plinth of the kiosk.

Although the types of uses would remain the same, Alternative B would change the feel of the park from one focused primarily on a passive recreational experience with a sculpture of General John J. Pershing to a larger memorial area integrated with recreation. The change would alter the feeling of the park from a passive experience of relaxation to a more reflective experience.

Walkway Options

Insertion of a walkway through the pool structure would alter the pool's use and appearance. Both the L Walkway and the Island Walkway Options would minimize the perceived size of the pool basin, but would have the following individual characteristics:

- The Island Walkway Option (see **Figure 8**) would retain access to water at a depth of 16" along all of the basin's four sides, maximizing a visitor's interaction with the water.
- The L Walkway Option (see **Figure 9**) would also retain access to the deeper water on all four sides, but with greater overall surface area of the water than the Island Walkway Option.

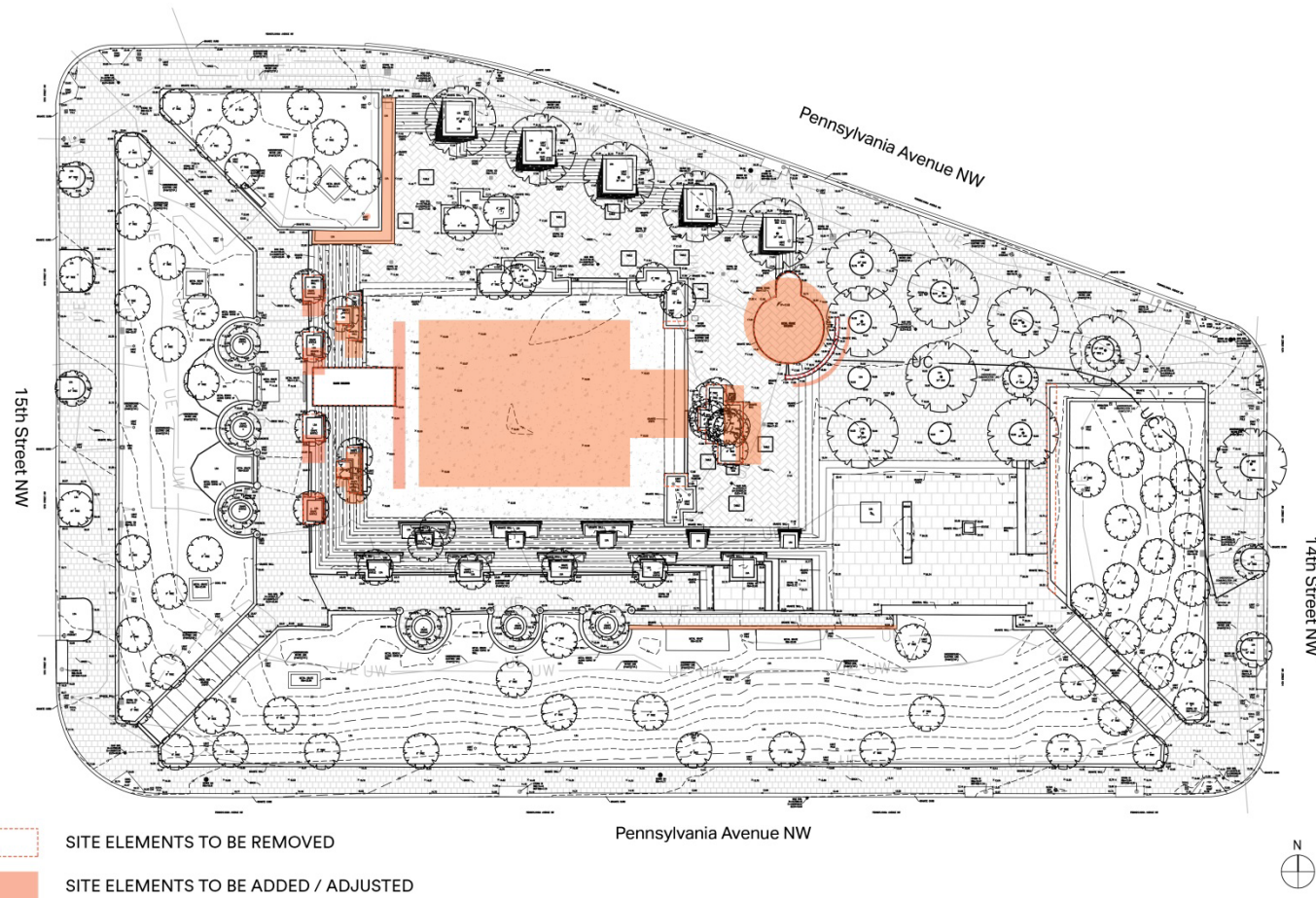


Figure 8: Alternative B: Freestanding Sculpture with Island Walkway Structural Changes to Pershing Park Site

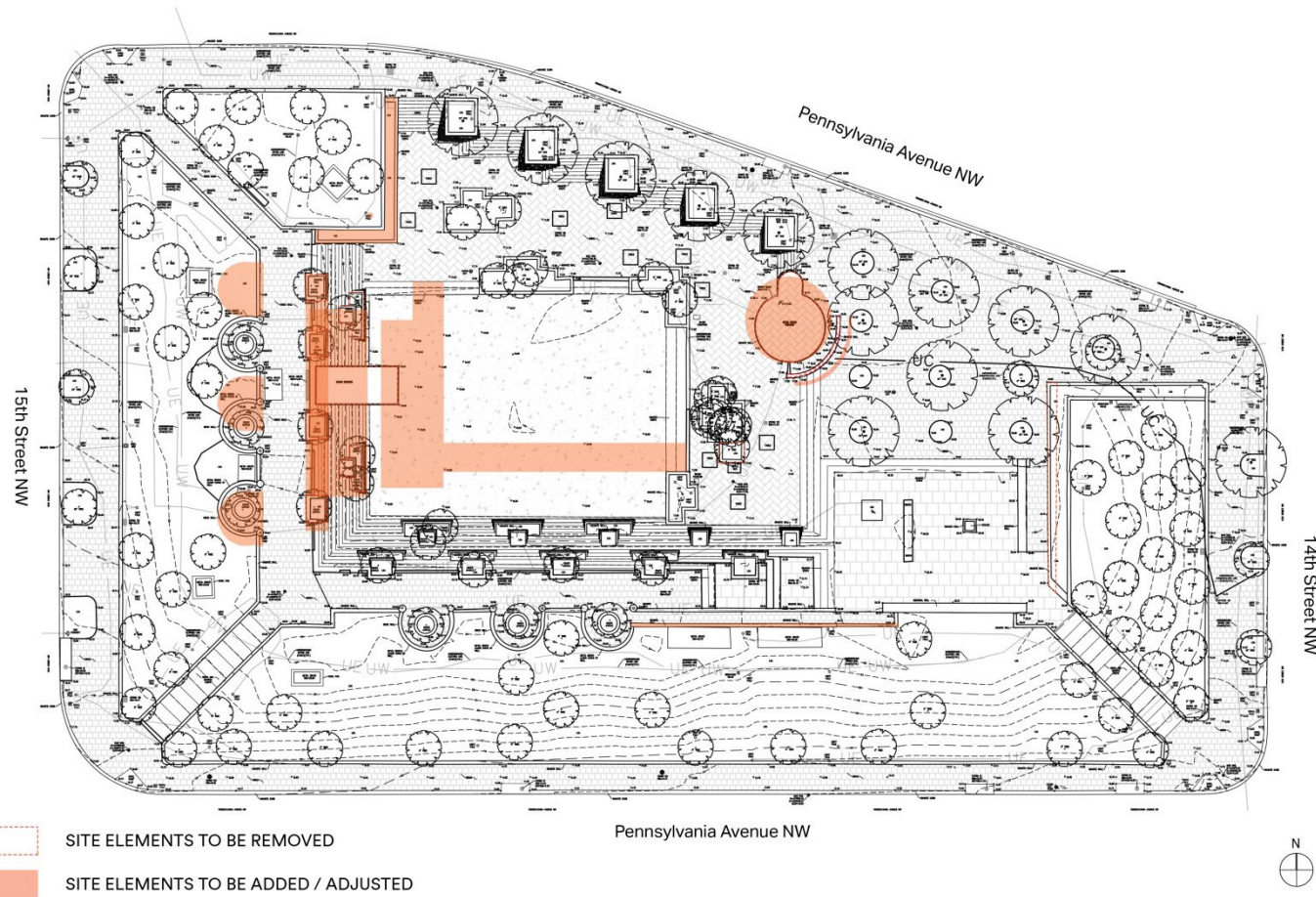


Figure 9: Alternative B: Integrated Sculpture with L Walkway Structural Changes to Pershing Park Site

Integrated Sculpture Option

The Integrated Sculpture Option's placement of the integrated 56.5-foot long commemorative sculpture along the western edge of the sunken plaza would also result in the removal of the cascade fountain, along with granite steps and planters along the western edge of the sunken plaza. The fountain expansion and removal of the western steps would alter the spatial relationship between the upper and lower sections of the park and change the visual connection to and from the western edge of the pool basin. Although the fountain feature would change, the Integrated Sculpture Option would retain an integrated focal feature along the western edge of the pool basin.

Freestanding Sculpture Option

The Freestanding Sculpture Option's placement of a freestanding 56.5-foot long commemorative sculpture in the pool basin would result in the removal of the cascade fountain structure and alter the spatial relationship of the fountain with the park. The Freestanding Sculpture Option would recreate a focal feature at the western portion of the pool; the sculpture's position would be aligned to be even with the face location of the front of the existing fountain. The commemorative sculpture's placement in the pool basin would result in a new space behind the commemorative sculpture and alter the continuous free flow of space that is one of the hallmarks of the park.

The commemorative sculpture's placement in the pool basin would also shorten views across the pool and the shrink the open space at the basin. The extended length of the commemorative sculpture would also block views from the western steps across the pool, changing the visual connection between the park and the western

steps. The western steps would be expanded, providing new access to the western edge of the pool. This change represents a notable departure from Friedberg's design

The site's auditory, visual, and physical experiences generated by the cascade fountain would also be altered from its original historical condition. In the Freestanding Sculpture Option, water would cascade over the west face of the commemorative sculpture directly down to the pool, whereas in the integrated Sculpture Option, water would cascade over the north and south faces of the commemorative sculpture into runnels which would bring the water down to the pool. In both sculpture options, water would also cascade below the sculpture. In both sculpture options, the fountain would help create ambient noise and visual interest that can be seen and heard from various points around the park, recreating a condition that is similar to the original design.

Vegetation

The Action Alternative would remove and replace all vegetation in-kind or with compatible vegetation, cultivars, or species, alter the configuration of planting beds throughout the park, and reduce the total number of trees from the Oehme van Sweden planting plan by approximately 47 trees (Freestanding Sculpture Option) or 55 trees (Integrated Sculpture Option) to provide more soil volume per tree and increase tree viability.

The Action Alternative planting plan would replace in-kind the rows of honey locust trees within the berms, but the expanded grid layout would alter the planting configuration and reduce the quantity from the Oehme van Sweden planting plan by approximately 34 trees (Freestanding Sculpture Option) or 37 trees (Integrated Sculpture Option).

The willow oaks located at the northeast corner would be replaced in-kind as needed. The removal of one willow oak would reduce the quantity from the Oehme van Sweden planting plan by one tree.

The willow oaks in planters with English ivy ground cover on the north side of pool would be replaced in-kind as needed. The total number of willow oaks in planters would be retained from the Oehme van Sweden planting plan.

The pink crape myrtles in the alcoves along the elevated walks would be replaced with compatible cultivar (i.e., white crape myrtle). The total number of crape myrtles would be retained from the Oehme van Sweden planting plan.

The pink crape myrtle and birch trees with ground cover at bases would be replaced with compatible cultivar (i.e., white crape myrtle) and compatible species (i.e., sweet magnolia), respectively. The total number of trees at these locations would be reduced from the Oehme van Sweden planting plan by approximately 12 trees (Freestanding Sculpture Option) or 16 trees (Integrated Sculpture Option).

The lawn on the berms and native and naturalized grasses and perennial flowering plants would be replaced with vegetation compatible to that in the Oehme van Sweden planting plan.

As a result, the Action Alternative would result in a long-term detectable adverse impact on the former Pershing Park due to changes to the spatial organization, omnidirectional views, built features, water features, vegetation, and small-scale features with both the Integrated and Freestanding Sculpture Options and the Island and L Walkway Options.

Pennsylvania Avenue, NW - White House to the Capitol Cultural Landscape

Alternative B would retain the spatial organization of the street and park interface. The basic outline of Pershing Park is shaped by city streets that would remain in place, along with the berms, park entrances, and the park edges (see **Figure 8**).

The Action Alternative would result in no changes to the Pennsylvania Avenue sidewalk. The PADC lights and views of the U.S. Capitol and the Treasury Building would be retained. Overall, the commemorative, recreation, and transportation uses would remain the same under the proposed action. The park would continue to function primarily as a commemorative and recreational park.

The General John J. Pershing Memorial statue and granite walls would not be altered.

Temporary changes to the Pennsylvania Avenue street trees would occur during construction when the trees are replaced. The changes would be consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* because the trees would be replaced in-kind.

The Action Alternative's adverse impact on Pershing Park, which is a contributing feature to the Pennsylvania Avenue, NW – White House to the Capitol Cultural Landscape, would result in a long-term direct, detectable adverse impact on the Pennsylvania Avenue NHS.

Cumulative Impacts: Similar to Alternative A, the other past, present, and reasonably foreseeable future projects that have or will likely have cumulative impacts on cultural landscapes include the ABMC's planned improvements to the General Pershing Commemorative Work and the Pennsylvania Avenue NHS 2014

Management Plan's specific area actions for Pershing Park. The ABMC's work to clean, repair, and enhance the visibility of the inscriptions on the Commemorative Work's granite walls and repair the plaza could have a detectable beneficial impact on the granite walls and paving, which are character-defining built features in the park. The Management Plan's specific area actions for Pershing Park could have no detectable, adverse, or beneficial impacts on the cultural landscapes depending on the actions implemented. Any changes to the cultural landscapes that result in impacts that are not detectable or beneficial, however, could experience deferred maintenance in the future. The NCPC Pennsylvania Avenue Initiative would encourage improvements throughout the Pennsylvania Avenue corridor, and could alter the streetscape features, resulting in a potential adverse impact. When the adverse impacts of Alternative B are combined with the impacts of these other projects, an overall long-term adverse cumulative impact would result.

Mitigation: Multiple mitigation measures have been identified through the impact analysis to avoid and/or minimize environmental impacts under the Action Alternative.

In order to mitigate potential impacts on cultural landscapes, a Memorandum of Agreement (MOA) between the WWICC, NPS, SHPO, and other parties as appropriate would be undertaken to identify measures to mitigate impacts on Pershing Park. Potential strategies include the following:

- Use of structural elements and materials that would complement, not replicate, existing features.
- Maintenance and replacement of vegetation in-kind or with vegetation that adheres to planting strategies

and framework to perpetuate the historic landscape design.

- Documentation of former Pershing Park's historic resources and design.
- Replacement of the water in the pool and fountain
- Interpretation of former Pershing Park's historic resources and design in the design of the World War I Memorial.
- Preparation of NRHP nomination for the World War I Memorial.

A 2017 existing conditions assessment identified 131 trees of five different species at the World War I Memorial site (GWWO, Inc./Architects 2017). The assessment offered recommendations for the treatment of these trees. Based on the assessment, mitigation associated with cultural landscapes would include the following:

- Removal and replacement of trees due to tree condition or because of their location in relation to other trees to try and prevent competition or damage to infrastructure
- Soil program for trees to correct nutrient deficiencies and optimize soil conditions for the trees

Conclusion: Alternative B would result in long-term detectable adverse impacts on cultural landscapes and would contribute to adverse impacts on the overall long-term adverse cumulative impact on cultural landscapes.

Visitor Use and Experience

Affected Environment

The World War I Memorial site currently provides recreational, commemorative, and circulation uses within the site; the site functions as an urban plaza for passive recreation and as a commemorative space for the General Pershing Commemorative Work. The Commemorative Work consists of a bronze statue of General John J. Pershing by sculptor Robert White flanked by two granite walls to the south and east and a bench to the west.

The park provides open space with seating. Existing seating at the site includes three alcoves along the southern and western elevated walks, granite steps that create amphitheater seating around the pool basin, and a granite bench to the west of the General John J. Pershing statue. The site has concrete table-bench units within the plaza area.

The site was intended to offer local workers and others space to eat lunch outdoors in a park setting. Although not intended as part of the former Pershing Park's design, damage on the granite edging of the steps ascending the berms suggests skateboarding at the site.

Visitors can access the secluded interior space of the site from the four corners of the site and from the length of Pennsylvania Avenue NW along the north side. A set of steps at the southwest and southeast corners lead visitors to an upper terrace. Accessible entry is available at the northwest corner and along Pennsylvania Avenue NW on the northern perimeter of the site. Two accessible ramps connect the General Pershing Commemorative Work to the southern upper walkway and to the tree grove along Pennsylvania Avenue NW.

The former Pershing Park was intended as a secluded peaceful setting for recreation and commemoration. The original design of the park included the conversion of the pool basin to an ice skating rink during winter months and concessions kiosk to support recreational activities. The ice rink closed for the 2006-2007 winter season due to mechanical issues and has since been out of service. As a result, the pool basin remains empty and without water throughout the year. The kiosk no longer provides services to visitors (GWWO, Inc./Architects 2017, NPS 2016, Robinson & Associates, Inc. and Commonwealth Heritage Group 2016).

Because of the site's accessibility and walkability challenges, lack of upkeep, and empty pool, site observations indicate that visitation levels are below park capacity. No special events occur regularly at the site.

About the Analysis

Potential impacts on visitor use and experience at and in the vicinity of the World War I Memorial were analyzed in consideration of the current visitor uses and activities, proposed enhancements included in the alternatives, the estimated increase in visitors that would result from the implementation of each alternative, and professional knowledge and judgement.

Impacts of Alternative A: No-Action

Alternative A would not add any new commemorative, recreational, or circulation elements within the site. No changes would occur to the site's seating or spatial organization, maintaining the existing visitor use and experience. No changes to current visitation levels would occur due to Alternative A. Visitors would continue to experience the site as it is today, and no impacts on visitor use and experience would occur.

Cumulative Impacts: Alternative A would have no impacts on visitor use and experience and would not contribute to cumulative impacts on visitor use and experience.

Conclusion: No impacts would occur to visitor use and experience under Alternative A, and the alternative would not contribute to cumulative impacts on visitor use and experience.

Impacts of Alternatives B: Action Alternative

Alternative B would continue and expand commemorative uses within the site, as well as continue recreational and circulation uses of the park. In addition to the commemorative space for the General Pershing Commemorative Work, Alternative B would introduce a commemorative sculpture 56.5 feet in length at the western portion of the pool, thus expanding the commemorative use and adding artwork to the site.

Seating would continue to be available for visitor use. The existing amphitheater seating along the southern portion of the pool, alcoves along southern and western elevated walks, and granite bench west of the General John J. Pershing statue would remain. The concrete table-bench units within the plaza would be replaced.

Alternative B would continue to offer visitors an outdoor space to sit outdoors, including eating lunch, at seating provided in the park. The granite steps would offer opportunities to interact with the water in the pool basin. The cascade fountain incorporated into the new commemorative sculpture would create background sound, reducing visitor perception of traffic noise and supporting the sense of enclosure at the park.

Access to the park would continue to be directly from the four corners of the site and Pennsylvania Avenue NW

along the north side. The accessible entrance would continue to be from the northwest corner and via the ramp around the kiosk in the northeastern portion of the site.

Internally, Alternative B would introduce an accessible walkway across the pool basin. The L Walkway Option would have connections at the southeastern and northwestern portions of the pool basin. The walkway would encourage visitors to approach from the southeastern corner and exit at the northwestern corner in order to “read,” or follow the narrative, the sculpture left-to-right. The Island Walkway Option would have one entry point on the eastern edge of the pool.

Alternative B would replace the existing unused kiosk and elevator structure with an elevated interpretive overlook. A ramp connecting the upper terrace with the depressed plaza would continue to provide access between levels; railings would be added to the ramp, improving safety and ease of use.

Additional access improvements would include widening the accessible ramp connecting the General Pershing Commemorative Work with the southern upper walkway and widening, extending the length, and reducing the slope of the accessible ramp connecting the General Pershing Commemorative Work with the tree grove along Pennsylvania Avenue NW. Both access improvements would bring the ramps in compliance of code requirements, improving safety and ease of use.

Due to the enhancement of the park through repair and rehabilitation of existing facilities and new commemorative elements, visitation levels would likely rise both for visitors seeking recreation and commemorative experiences. New interpretation, including signage, wayfinding, and other information,

would also enhance the visitor experience through descriptions of World War I and Pershing Park history. The WWICC, the NPS, and other organizations would offer programming at the park, such as concerts or commemorative events.

The inoperable cascade fountain would be removed and replaced with a sculpture with a fountain and overlook (Integrated Sculpture Option) or with planters, stairs, and freestanding sculpture with a fountain (Freestanding Sculpture Option).

In addition, Alternative B would prohibit access to the World War I Memorial site during the construction phase of the project.

Integrated Sculpture Option

The Integrated Sculpture Option would alter visitor use and experience at the site in multiple ways. The installation of the integrated sculpture would replace the existing cascade fountain and 49 feet of amphitheater-style granite stairs along the western edge of the pool basin. A gathering space would be incorporated into the western side of the commemorative sculpture, but would be separated from the pool basin by a cascade fountain with a height of approximately four feet. The area would be accessed from the western upper walkway.

The removal of the stairs would reduce the opportunity for direct interaction with the pool basin, limiting such interaction to the corners. Visitors would have the opportunity to interact with the cascade along the western, northern, and southern sides of the sculpture.

The Integrated Sculpture Option would shift seating along the upper western walkway in order to continue allowing views across the site.

Freestanding Sculpture Option

The Freestanding Sculpture Option would also alter visitor use and experience in multiple ways. This option would remove the existing cascade fountain structure and expand the amphitheater-style granite steps on the western edge of the pool. The planters along the western edge of the pool would be shifted in order to improve visibility. The Freestanding Sculpture Option would place the commemorative sculpture in the western portion of pool basin, with an inscription wall facing west.

The removal and replacement of the cascade fountain would offer visitors a greater opportunity to interact with pool by expanding seating along its edge. The expanded stairs also offer a gathering area from which to experience the inscription wall, cascade fountain, and pool. The existing seating along the upper western walkway would remain.

Cumulative Impacts: Alternative B would have long-term detectable beneficial impacts on visitor use and experience at the World War I Memorial site. Other past, present, and reasonably foreseeable future projects that have, or will likely have, cumulative impacts on visitor use and experience at and in the vicinity of the World War I Memorial site include ABMC Improvements to the General Pershing Commemorative Work and the Pennsylvania Avenue NHS 2014 Management Plan. The ABMC Improvements to the General Pershing Commemorative Work would improve the interpretive panels at the World War I Memorial site, as well as repair granite pavers at the Commemorative Work's plaza, both of which would result in beneficial cumulative impacts on visitor use and experience.

The Pennsylvania Avenue NHS Management Plan calls for several actions to improve the visitor use and experience of the Pennsylvania Avenue NHS, including Pershing Park. Among the general actions called for in the management plan are the reevaluation of the *Streetscape Manual* to improve pedestrian safety and nighttime use, improved interpretation, and improved wayfinding. Specifically, the management plan calls for rehabilitation of the World War I Memorial site, the development of stronger physical connections to commercial uses to the north, the replacement of concrete picnic tables, and the addition of floral displays. These changes that would occur as part of implementation of the Pennsylvania Avenue NHS Management Plan would result in beneficial impacts on visitor use and experience.

The Pennsylvania Avenue Initiative would improve the visitor experience by improving the civic experience urban landscape, circulation and mobility, and programming along the Avenue. Each of these efforts would result in beneficial impacts on visitor use and experience.

Alternative B would result in an overall beneficial impact associated with the addition of a commemorative sculpture, reintroduction of a cascade fountain and

reestablishment of the fountain pool, and an additional walkway to facilitate circulation. When the beneficial incremental impact of Alternative B is combined with the beneficial impacts of other projects, an overall detectable beneficial cumulative impact would result.

Conclusion: Alternative B would prohibit visitor use at the site during the construction phase, resulting in temporary noticeable adverse impacts. Overall, Alternative B would maintain existing park uses, but would expand the commemorative experience. Circulation throughout the site would be expanded through the placement of a walkway across the pool. With the installation of a cascade fountain as part of the commemorative sculpture and the re-establishment of the fountain pool, the intended experience of a pool and fountain would be reinstated. Therefore, Alternative B would result in overall long-term detectable beneficial impacts on visitor use and experience. Alternative B would add a beneficial noticeable impact to the cumulative impacts of other projects.

Summary of Environmental Consequences

A summary of the environmental consequences of each alternative will be presented in a table following the impact analysis.

Table 4: Summary of Environmental Consequences

Impact Topic	Alternative A: No-Action Alternative	Alternative B : Action Alternative
Cultural Landscapes	Alternative A would result in detectable adverse impacts on cultural landscapes and would contribute adverse impacts on the overall adverse cumulative impact on cultural landscapes.	Alternative B would result in detectable long-term adverse impacts on Pershing Park due to changes in the spatial organization, omnidirectional views, built features (including water features), vegetation, and small-scale built features as a result of replacement of the existing cascade fountain with a freestanding or integrated commemorative sculpture fountain; the placement of an L- shaped walkway or central walkway (Island Walkway) across the pool basin; the removal of steps and planters, the replacement of vegetation, and the removal of trash cans. Alternative B would result in temporary adverse impacts on the Pennsylvania Avenue NW-White House to the Capitol Cultural Landscape due to tree replacement, and long-term, detectable adverse impacts on the cultural landscape due to the adverse impact on Pershing Park. These changes would contribute to adverse impacts on the overall adverse cumulative impact on cultural landscapes.
Visitor Use and Experience	No impacts on visitor use and experience would occur under Alternative A, and the alternative would not contribute to cumulative impacts on visitor use and experience.	Temporary adverse impacts on park visitors would occur during construction. Alternative B would result in overall noticeable beneficial impacts on visitor use and experience. Alternative B would maintain existing park uses, but would expand the commemorative experience. Circulation throughout the site would be expanded through the placement of an L- shaped walkway or central walkway (Island Walkway) across the pool. Through the installation of a cascade fountain as part of either the integrated or freestanding commemorative sculpture and the re-establishment of the fountain pool, the intended experience of a pool and fountain would be reinstated. Alternative B would add a long-term detectable beneficial impact to the cumulative impacts of other projects.

Consultation and Coordination

Throughout the planning process, the WWICC and NPS have coordinated with multiple agencies and members of the public, including through the public scoping, the Section 106 historic preservation review, and the design review processes. The following summarizes the coordination that has taken place.

Public Input through the NEPA and Section 106 Processes

A public scoping period for the EA for the memorial design was held in May 2015, coinciding with the initiation of the design competition. The public was invited to comment on the proposed establishment of the World War I Memorial within the former Pershing Park and to identify potential issues or concerns for consideration in the EA. At that time, the WWICC and NPS received comments from multiple organizations, as well as individuals.

In addition, the WWICC and NPS have held six Section 106 consulting parties meetings, the first of which

occurred in December 2015, prior to the selection of a design concept. Since that time, the design concept has evolved to avoid and minimize adverse effects to contributing features of historic properties, including Pershing Park, which was determined eligible for listing in the National Register of Historic Places. Consulting parties have reached consensus that an adverse effect to Pershing Park will occur; the WWICC and NPS are working to identify minimization and mitigation strategies and to draft a memorandum of agreement (MOA).

Agency Review

Both NCPC and U.S. Commission of Fine Arts (CFA) have reviewed the design concept on multiple occasions. NCPC has reviewed the design concept four times, between November 2016 and October 2018, providing comments. CFA has reviewed the design nine times between December 2015 and November 2018. CFA granted concept approval in May 2017 and revised concept approval in July 2018.

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References

- GWWO, Inc./Architects. 2017. Existing Conditions Assessment Pershing Park.
- National Capital Planning Commission (NCPC). 2017. National Environmental Policy Act Regulations. Published in the Federal Register Volume 82, No. 188 45421-45432 under September 28, 2017.
- National Park Service (NPS). 2016. Cultural Landscape Inventory, Pennsylvania Avenue, NW-White House to the Capitol.
- NPS. 2017. Foundation Document National Mall and Memorial Parks. Washington, DC.
- NPS. 2006. Management Policies 2006.
- NPS. 2010. *National Mall Plan/ Environmental Impact Statement*. Washington, DC.
- NPS. 2007. National Register of Historic Places Registration Form: Pennsylvania Avenue National Historic Site.
- NPS. 2015. NEPA Handbook.
- NPS. 2014. Pennsylvania Avenue National Historic Site Management Plan. Washington, DC.
- NPS. 1998. NPS-28: Cultural Resource Management Guideline.
- Robinson & Associates, Inc. and Commonwealth Heritage Group, Inc. 2016. Pershing Park (U.S. Reservation 617) Determination of Eligibility.