Determination of NEPA Adequacy when taking a new proposed action and making a new decision

A. Project Information

Park Name: National Mall and Memorial Parks
PEPC Project Number: 139091
Original project PEPC ID (if NPS): 139091
Project Title: East Potomac Park Golf Course - Tree Management and Cultural Landscape Rehabilitation
Project Location: National Mall and Memorial Parks
County, State: Washington, DC
Project Leader: Tammy Stidham

B. Description of the Proposed Action and any applicable mitigation measures

During implementation of the tree removal activities on October 10, 2026, the NPS identified that trees and vegetation within the area identified on the map below as Zone A (often referred to as Trash Island) were underrepresented in the original environmental and cultural resource compliance documentation. The area contains refuse from the prior lessee and had not been properly maintained. The lack of maintenance resulted in unmanaged, dense vegetation in the area. The initial assessment estimated approximately 169 trees within this area; however, the dense vegetation made it difficult to accurately identify and inventory individual trees. During removal activities, an additional 200 trees were identified and removed beyond the original estimate. Although classified by the NPS as trees, they are more accurately characterized as small-diameter, immature trees, generally ranging from 3 to 5 inches in diameter at breast height (DBH).

As a result, the original compliance documentation did not fully account for the extent of vegetation removal within Zone A. Unlike Zone A, Zone B did not experience a discrepancy between the number of trees identified in the original inventory and those removed during implementation. Accordingly, the inventory limitations identified in Zone A were isolated to that area and did not affect the accuracy of compliance review for the other zones. Additional review is necessary to document the discrepancy between the estimated and actual number of trees removed, evaluate whether the additional removals resulted in effects beyond those previously assessed, and determine whether further analysis or consultation is warranted under the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act (NHPA), or other applicable environmental compliance requirements. See map in Appendix A – Contractor Work Zones.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

1. East Potomac Park Golf Course - Tree Management and Cultural Landscape Rehabilitation Categorical Exclusion October 9, 2026

D. NEPA Adequacy Criteria

1. Is the proposed action a feature of, or essentially like an alternative analyzed in the existing NEPA document(s)?

   Yes, the additional tree removal within Zone A is consistent with the type of vegetation management activities evaluated in the existing NEPA Categorical Exclusion (CE) for the East Potomac Park Golf Course Tree Management and Cultural Landscape Rehabilitation project. The original CE addressed selective removal of non-contributing trees and woody vegetation to restore the historically open links-style character of the golf course, improve significant views and vistas, and implement the treatment recommendations of the 2019 Cultural Landscape Report.

   Although the original assessment underestimated the number of individual trees within Zone A due to the density of vegetation, the additional 200 small-diameter trees removed represent the same general type of vegetation management activity considered in the original review. The additional removals do not constitute a new category of action or change the overall purpose of the project.

   However, because the actual number of individual trees removed exceeded the original inventory, additional review is necessary to document the discrepancy and confirm that the increased extent of vegetation removal does not introduce environmental effects materially different from those considered in the existing CE. This includes verifying that the additional removals were consistent with the approved treatment objectives and applicable resource-protection measures.

2. Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)?

   Yes, the additional tree removal occurred within Zone A, an area located entirely within the East Potomac Park Golf Course and the geographic boundaries evaluated in the existing NEPA CE. The original environmental review included Zone A as part of the proposed vegetation management activities and estimated approximately 169 trees for removal within this area. However, due to the density of vegetation, the original inventory did not fully account for all individual trees present, and undercounted immature, small diameter trees.

   The additional removals did not expand the geographic boundaries of the project or introduce activities into previously unevaluated locations. The affected vegetation was part of the same densely vegetated area identified for treatment under the Tree Management Plan and the 2019 Cultural Landscape Report. Accordingly, the geographic and resource conditions remain consistent with those considered in the original environmental analysis. The increased number of trees represents a discrepancy in the original inventory which undercounted small, immature trees due to the dense and overgrown vegetation in Zone A rather than a change in project location or the general nature of the affected resources. However, the additional review should confirm that the greater extent of removal did not materially alter the anticipated

environmental effects.

3. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

   Yes, *the existing NEPA CE remains appropriate for evaluating the additional tree removal within Zone A. The original compliance review considered vegetation management activities intended to implement the recommendations of the 2019 Cultural Landscape Report and the Tree Management Plan, including removal of non-contributing vegetation to restore the historically open links-style character of East Potomac Park Golf Course.*

   Although the original inventory underestimated the number of immature, small diameter trees within Zone A, the additional removal of approximately 200 small-diameter trees did not change the purpose or nature of the action. The additional trees were located within the same densely vegetated area identified for treatment, and their removal was consistent with the vegetation management activities described in the original CE.

   Because the original NEPA review was completed through a categorical exclusion, a formal range of alternatives was not developed or analyzed. Nevertheless, the additional removals do not represent a substantially different approach to achieving the established cultural landscape rehabilitation objectives. No new environmental concerns, resource values, or substantially different alternatives have been identified that would warrant reconsideration of the original approach, based on the information currently available.

   Accordingly, the existing CE remains an appropriate basis for evaluating the action. The additional removals do not result in materially different environmental effects or extraordinary circumstances that would preclude continued reliance on the categorical exclusion.

4. Is the existing analysis valid in light of any new information or circumstances relevant to the proposed action?

   Yes, *the existing NEPA analysis remains valid in light of the additional information identified during implementation of the East Potomac Park Golf Course Tree Management and Cultural Landscape Rehabilitation project. Although the original tree inventory underestimated the number of individual trees within Zone A, the additional removal of approximately 200 small-diameter trees does not appear to substantially change the nature, location, or anticipated environmental effects of the action.*

   The additional trees were located within the same densely vegetated area previously identified for treatment and were consistent with the types of non-contributing and unmanaged vegetation addressed in the original CE. The increased number of removals reflects limitations in the original inventory resulting from the density of vegetation rather than a change in the project's purpose, scope, or treatment objectives.

   The additional removals remain consistent with the recommendations of the 2019 Cultural Landscape Report and the Tree Management Plan, which emphasize restoring the historically

open links-style character of the golf course through selective vegetation management. The additional removals did not introduce a new type of activity or expand the project into previously unevaluated areas.

Based on the information currently available, the additional removals are not expected to substantially change the environmental effects considered in the original CE. The additional removals did not result in previously unidentified impacts to historic landscape features, wildlife habitat, soils, or other protected resources. The existing NEPA analysis remains applicable, and preparation of additional NEPA documentation is not anticipated to be necessary.

5. Are the reasonably foreseeable effects that would result from implementation of the proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

   Yes, the reasonably foreseeable environmental effects associated with the additional tree removal within Zone A are generally consistent in nature with those evaluated in the existing NEPA CE. The original analysis considered the removal of non-contributing, woody vegetation, including associated ground disturbance, changes in vegetation cover, potential impacts to wildlife habitat, and alterations to the historic cultural landscape.

   Although this represents a substantial numerical increase within that portion of the project area, the additional vegetation consisted primarily of smaller trees within the same densely vegetated area previously identified for treatment. The types of environmental effects associated with these removals are therefore qualitatively similar to those considered in the original analysis.

   Quantitatively, the additional removals increased the extent of vegetation loss beyond the original estimate. However, the relatively small diameter of the additional trees, their concentration within an area already identified for vegetation management, and the absence of an expansion into previously unevaluated areas did not alter the overall environmental effects of the project.

   This additional review documents the increased extent of vegetation removal and verifies that associated effects on wildlife habitat, soils, erosion potential, and historic landscape characteristics remain within the scope of the original analysis. The existing CE remains an appropriate basis for NEPA compliance.

E. Are the public involvement and interagency review or other compliance requirements associated with actions approved under existing NEPA document(s) adequate for the current proposed action?

Yes, *the public involvement, interagency review, and other compliance requirements associated with the existing NEPA CE and Section 106 Streamlined Review remain appropriate for the additional tree removal within Zone A. The original action was evaluated under DOI NEPA Handbook, Appendix 2,*

Section 12.5 C(4), and Section 106 Activity #5, Routine Grounds Maintenance, of the 2008 NPS Servicewide Programmatic Agreement. Neither compliance pathway required public involvement for the original undertaking, and no public involvement was conducted.

The additional removal of approximately 200 small-diameter trees occurred within the same geographic area and involved the same types of vegetation management activities evaluated in the original compliance documentation. Although the number of trees removed exceeded the original estimate, the additional removals did not change the purpose of the undertaking or introduce a new category of activity that would independently require public involvement.

The original Section 106 review resulted in a No Adverse Effect determination through the streamlined review process, which did not require separate consultation with the State Historic Preservation Officer (SHPO) or consulting parties. The additional removals are consistent with the general vegetation management objectives evaluated under that review. The increased removal did not affect contributing vegetation or character-defining features of the historic cultural landscape, and the undertaking continues to qualify for streamlined review under the 2008 Programmatic Agreement. In addition, the associated Endangered Species Act (Section 7) , Migratory Bird Act, and other protected resources, remain satisfied and do not require update. Based on the information currently available, the additional small diameter tree removals do not warrant new public involvement or interagency consultation.

F. Persons /Agencies / NPS Staff Consulted (if applicable). *Include name, title, and resource agency represented.*

Tammy Stidham, Associate Regional Director – Lands and Planning
Mike Commisso, Deputy Superintendent, National Mall and Memorial Parks

Conclusion

I have reviewed the proposed action described in the NEPA and other documentation prepared for this project. All required compliance (e.g., National Historic Preservation Act, Endangered Species Act, Tribal consultation, as applicable) is complete and documented in the project file. Based on this review, I have decided to approve and authorize the proposed action, including all design features, mitigation measures, and stipulations identified in the project file. This decision authorizes implementation of the action as described.

Kevin J. Griess
SUPERINTENDENT
National Mall and Memorial Parks
National Park Service

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Kevin Griess
Superintendent
National Mall and Memorial Parks

Date

Appendix A – Contractor Work Zones