

Memorial to Victims of the Ukrainian Famine-Genocide 1932-1933 Environmental Assessment

Washington, DC



May, 2012

Responsible Federal Agency



This page is intentionally left blank

MEMORIAL TO VICTIMS OF THE UKRAINIAN FAMINE-GENOCIDE 1932-1933 ENVIRONMENTAL ASSESSMENT

TABLE OF CONTENTS

EXECUTIVE SUMMARY	ES-1	2.0 ALTERNATIVES	
TABLE OF CONTENTS	I	2.1 INTRODUCTION	2-1
1.0 PURPOSE AND NEED	1-1	2.2 DESCRIPTION OF ALTERNATIVES	2-1
1.1 INTRODUCTION	1-1	2.2.1 No Action Alternative	2-1
1.2 PURPOSE AND NEED FOR ACTION	1-3	2.2.2 Elements Common to All Alternatives.....	2-3
1.3 PROJECT BACKGROUND.....	1-3	2.2.3 Alternative 1	2-5
1.3.1 Agency Relationships.....	1-4	2.2.4 Alternative 2	2-10
1.3.2 Purpose and Significance of the Park	1-6	2.3 IDENTIFICATION OF THE PREFERRED ALTERNATIVE	2-14
1.3.3 Relationship to Laws, Executive Orders, Policies, and Other Plans.....	1-7	2.4 CONSTRUCTION STAGING	2-14
1.4 SCOPING	1-15	2.5 MITIGATION MEASURES OF THE ACTION ALTERNATIVES.....	2-15
1.5 ISSUES	1-16	2.6 RELATIONSHIP TO THE NCPC SITE SELECTION MITIGATION MEASURES	2-16
1.6 IMPACT TOPICS ANALYZED IN THIS EA	1-17	2.7 ALTERNATIVES CONSIDERED BUT DISMISSED	2-19
1.6.1 Impact Topics Dismissed from Further Analysis.....	1-18	2.7.1 Destroyed Sphere	2-20
		2.6.2 Ritual Cloth.....	2-20
		2.6.3 Tear Drops on a Wheat Field	2-21
		2.7 ENVIRONMENTALLY PREFERRABLE ALTERNATIVE.....	2-21

2.8	SUMMARY OF ENVIRONMENTAL CONSEQUENCES	2-23
-----	--	------

3.0 AFFECTED ENVIRONMENT

3.1	CULTURAL RESOURCES	3-1
3.1.1	Historic Resources.....	3-4
3.2	VISITOR USE AND EXPERIENCE	3-10

4.0 ENVIRONMENTAL CONSEQUENCES

4.1	GENERAL METHODOLOGY FOR ESTABLISHING IMPACT THRESHOLDS AND MEASURING EFFECTS BY RESOURCE.....	4-1
4.1.1	General Analysis Methods.....	4-1
4.1.2	Basic Assumptions	4-1
4.1.3	Impact Thresholds.....	4-2
4.1.4	Cumulative Impact Analysis Method	4-2
4.2	CULTURAL RESOURCES	4-9
4.2.1	HISTORIC RESOURCES	4-9
4.3	VISITOR USE AND EXPERIENCE.....	4-18

5.0	CONSULTATION AND COORDINATION.....	5-1
5.1	AGENCY CONSULTATION AND COORDINATION....	5-1
6.0	LIST OF PREPARERS	6-1
7.0	GLOSSARY AND ACRONYMS	7-1
7.1	GLOSSARY OF TERMS.....	7-1
7.2	ACRONYMS	7-4
8.0	REFERENCES	8-1
APPENDIX A		A-1
APPENDIX B		B-1
APPENDIX C		C-1

List of Figures

1-1	Memorial location.....	1-2
2-1	Project site.....	2-1
2-2	No Action Alternative existing conditions.....	2-2
2-3	Alternative 1 elevation.....	2-6
2-4	Alternative 1 site plan.....	2-7
2-5	Alternative 1 perspective from Massachusetts Avenue	2-8
2-6	Alternative 1 site section	2-9
2-7	Alternative 2 elevation of sculpture.....	2-10
2-8	Alternative 2 site plan	2-11
2-9	Alternative 2 perspective from Massachusetts Avenue	2-12
2-10	Alternative 2 site section	2-13
2-11	Destroyed Sphere design.....	2-20
2-12	Ritual Cloth design.....	2-20
2-13	Tear Drops on a Wheat Field design	2-21
3-1	Area of Potential Effects (APE).....	3-3
3-2	L'Enfant Plan, 1887	3-4
3-3	McMillan Plan	3-5
3-4	Gales School.....	3-6
3-5	Old Engine Company Number 3.....	3-6
3-6	City Post Office	3-7
3-7	Union Station.....	3-7
3-8	Columbus Fountain	3-8
3-9	Former Childs Restaurant building.....	3-9
4-1	View west along F Street, Alternative 1.....	4-21
4-2	View east along F Street, Alternative 1	4-21
4-3	View west along F Street, Alternative 2.....	4-23
4-4	View east along F Street, Alternative 2	4-24

List of Tables

2-1	Summary of Impacts to Resources by Alternative	2-22
3-1	Historic Properties within Area of Potential Effects	3-2
4-1	Summary of Cumulative Projects	4-4

EXECUTIVE SUMMARY

This page is intentionally left blank

EXECUTIVE SUMMARY

The National Park Service (NPS), in association with the Government of Ukraine and the National Capital Planning Commission (NCPC), has prepared an Environmental Assessment (EA) to evaluate impacts of two alternatives for the design of a memorial to victims of the Ukrainian Famine-Genocide 1932-1933. The site for the Memorial is bound by Massachusetts Avenue, NW to the north, North Capitol Street to the east, F Street, NW to the south, and a building currently housing a Suntrust Bank to the west.

As identified in the authorizing legislation in 2006, Public Law 109-340, the purpose of the Memorial is “to honor the victims of the Ukrainian famine-genocide of 1932-1933.” In addition, the Memorial would serve to inform the public of the use of food as a method of coercion. Because the manmade famine in the Ukraine is largely unknown in the United States, the Memorial is needed to inform the public of these events in which millions of people lost their lives.

This EA presents two design concepts, or action alternatives, and a No Action Alternative. The two designs feature a sculptural element within a plaza and landscaped setting. Alternative 1 would include a linear sculpture with landscape trees and a plaza to complement the sculpture’s line, while Alternative 2 would feature a central sculpture and plaza with landscaping. In both alternatives, access to the site would be via both Massachusetts Avenue and F Street. Alternative 2 would also allow entry via the sidewalk entry area from the neighboring bank building. Interpretive panels would help educate visitors to the site about these events. Although the existing grass panel and flagpole would be removed, passive recreation opportunities would continue at the site.

The implementation of the action alternatives would result in long-term beneficial impacts on visitor use and experience. The action alternatives would result in long-term negligible to moderate impacts on historic resources.

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

This page is intentionally left blank

1.0 PURPOSE AND NEED

This page is intentionally left blank

1.1 INTRODUCTION

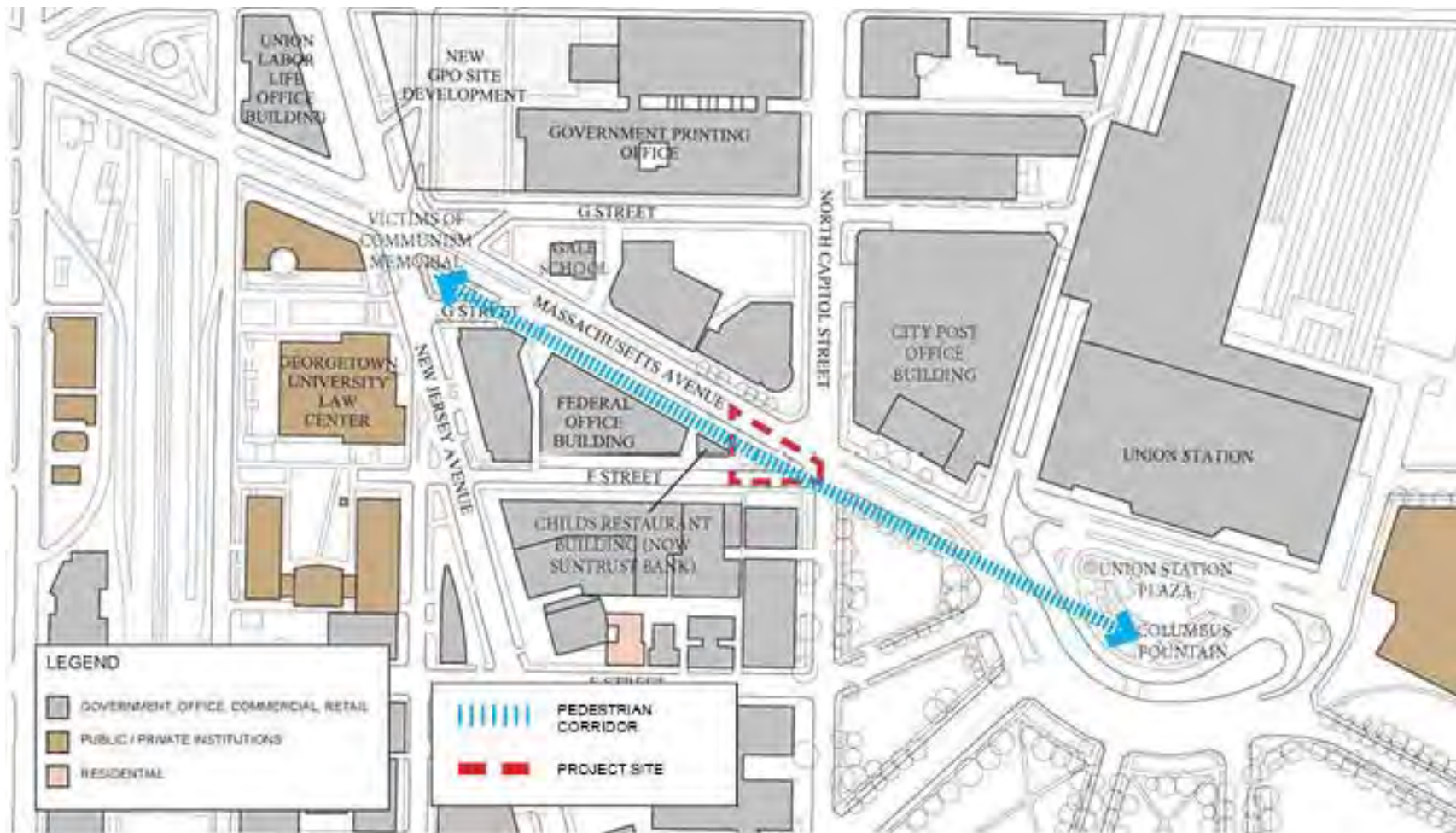
The National Park Service (NPS), on behalf of the Government of Ukraine, proposes to establish and operate a memorial to honor the victims of the Ukrainian famine-genocide of 1932-1933 (the Memorial). The Memorial would include sculptural elements, a plaza, and landscaping features to honor victims of this manmade event. The site for the Memorial is bound by Massachusetts Avenue, NW to the north, North Capitol Street to the east, F Street, NW to the south, and a building currently housing a Suntrust Bank to the west, as illustrated in Figure 1-1. Further references to streets are assumed to be NW, unless otherwise specified.

In 2006, Congress passed Public Law 109-340, which authorized the Government of Ukraine to establish a memorial on federal land in the District of Columbia to honor the victims of the Ukrainian famine-genocide of 1932-1933. In the Ukrainian language, this is referred to as Holodomor. The Ukrainian government is working with the Ukrainian Congress Committee of America, Inc. (UCCA), a non-partisan, non-profit organization that has represented the interests of ethnic Ukrainians in the United States for over 60 years, to establish an international memorial as a tribute to the millions of Ukrainians who suffered as a result of the Soviet-forced famine in 1932 and 1933.

The Ukrainian government and UCCA, with assistance from NPS, are responsible for designing and constructing the Memorial. Once construction is complete, the memorial would be operated and maintained by the Government of Ukraine and UCCA.

The review and approval of the design, construction, and operation of the Memorial 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) is a cooperating agency, which is requested or designated by the lead agency to assist in the preparation of the EA.

NPS, in association with the Government of Ukraine and UCCA, 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.



1-1: Memorial location

Source: Google and AECOM, 2011

1.2 PURPOSE AND NEED FOR ACTION

The proposed action is the design, construction, and operation of a memorial to honor the victims of the Ukrainian man-made famine of 1932-1933. This includes the review and approval of the memorial design and construction.

Between those two subject years, the Soviet Union deliberately and systematically starved the Ukrainian population of approximately 30 million, resulting in seven to ten million deaths, by introducing unrealistically high quotas on grain and other agricultural products. These quotas were strictly enforced and guarded by the Soviet military. Only when Ukraine restored its independence from the Soviet Union in 1991 did the Ukrainian people begin to discuss openly the events of 1923-1933, with witnesses coming forward to tell of their horrific experiences.

As stated in the authorizing legislation, the purpose of the Memorial is “to honor the victims of the Ukrainian famine-genocide of 1932-1933.” In addition, the Memorial would serve to inform the public of the use of food as a method of coercion.

Because the manmade famine in the Ukraine is largely unknown in the United States, the Memorial is needed to inform the public of these events in which millions of people lost their lives. By bringing increased awareness to the use of food as an intimidation tactic, the Memorial would help to avoid future occurrences. The Memorial is intended to honor the memory of the millions who lost their lives and serve as a tangible reminder of the need to prevent such tragedies in the future.

1.3 PROJECT BACKGROUND

On October 13, 2006, Congress approved Public Law 109-340 authorizing the Government of Ukraine to establish a memorial on federal land in Washington, DC. The Ukrainian government and UCCA have worked with NPS and NCPC to select a site and create a design suitable to carry out the authorization of the Memorial prior to the development of Memorial designs.

Site Selection

In 2008, NPS, the Ukrainian government, and UCCA evaluated potential locations for the establishment of the Memorial. In association with the Ukrainian government and UCCA, NPS completed the *Memorial to Victims of the Ukrainian Famine of 1932-1933 Site Selection Environmental Assessment* (Site Selection EA) for the selection of the site (NPS and UCCA, 2008). NCPC was cooperating agency on that 2008 EA as well. This document concluded that no significant impact would result due to the location of the Memorial at the site, but NPS did not issue a Finding of No Significant Impact (FONSI). The U.S. Commission of Fine Arts (CFA) approved the site selection in September, 2008. In October, 2008, NCPC also approved the site contingent upon the adherence to mitigation measures that were including in NCPC’s FONSI for the site selection. The mitigation measures are outlined below:

1. To protect park and visual resources and the socio-economic environment, the design must:
 - a. Create a successful and functional public space that befits this site’s prominence in the National Capital and embraces its natural openness and place within

significant L'Enfant rights of way. Any free-standing memorial element must be secondary in nature.

- b. Respect the scale of the site and incorporate an understated design, as defined for representative sites of similar size and position in the Memorial and Museums Master Plan;
 - c. Incorporate significant green elements;
 - d. Integrate the site's apex with the small historic building to the west and with the rest of the block;
 - e. Remain open and integrated into the surrounding built environment and rights of way and remain accessible to passers-by;
 - f. Respect the building lines of the surrounding rights of way, particularly along Massachusetts Avenue; if a vertical element is anticipated, orient its center along the building lines of Massachusetts Avenue and avoid vertical elements in the approximately 30 foot space from the building lines to the Reservation edge (40 feet from the building line to the curb along Massachusetts Avenue); if a more horizontal feature is anticipated, retain a low profile, which respects the Massachusetts Avenue right of way and views of the Postal Museum and Union Station).
2. To protect historic resources, prior to construction, perform a Phase 1 archeological identification survey.

Memorial Design

Following the selection and approval of the site, the Ukrainian Ministry of Culture and Tourism held an international design competition in the fall of 2009. The competition guidelines required the incorporation of green elements into the project proposals; the use of durable construction materials to endure the local climate; a sense of openness for pedestrians, and for the designs to be aesthetically consistent with the surrounding environment. In December of 2009, a jury comprised of Ukrainian nationals and Ukrainians from the United States and Canada reviewed 52 submissions. The jury identified five finalists.

NPS, the Embassy of Ukraine, and UCCA narrowed down the five finalists to two alternatives. Although the competition guidelines required the use of durable construction materials, two of the final five entries did not meet this criterion; NPS, the Embassy of Ukraine, and UCCA dismissed these alternatives from consideration. An additional design was also dismissed from further consideration due to the abstract nature of the design that did not effectively convey to American audiences the nature of the man-made famine.

1.3.1 Agency Relationships

Although the Ukrainian government and UCCA propose to construct and fund the maintenance of the Memorial, NPS currently controls the project site. Following construction, the Ukrainian government would be responsible for the long-term operation and maintenance of the Memorial. In order to execute these responsibilities, NPS, the Ukrainian government, and UCCA would enter in to a memorandum of understanding or a memorandum of agreement, similar to that used for the Memorial to the Victims of Communism.

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 by NPS (40 U.S.C. Chapter 89, Section 8906).

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 regulations require applicants to prepare the necessary NEPA and Section 106 of the NHPA documents, in conformance with respective CEQ and ACHP requirements. At its December 1, 2011 meeting, NCPC reviewed the Memorial design alternatives for informational purposes. It is anticipated that preliminary and final design plans, which require NCPC approval, will be submitted in 2012.

CFA is also required to comply with federal regulations. 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. On October 20, 2011, CFA approved the design concept of the Memorial.

SHPO has reviewed the Memorial designs, as called for by the National Historic Preservation Act. SHPO must make determinations of effects, in coordination 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 project 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. Although the Memorial would be maintained by the Ukrainian Embassy, it would be under the jurisdiction and management of NAMA upon completion. As part of the planning process for the National Mall Plan (NPS, 2010), NPS developed a Foundation Statement designed to create a shared understanding of the purpose and significance of NAMA. This is intended to describe the park unit, rather than the resources found within the unit (the resources are specifically addressed in Sections 3 and 4 of this document).

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.
- 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 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. It also includes Executive Orders 12898, 11593, 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 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 Memorial site lies within Area II, in which “commemorative works of subjects of lasting historic significance to the American people may be located” (40 USC 8908 (b)). The Mall, located in the Reserve, 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.

In considering site and design approvals, CFA and NCPC shall be guided but not limited by the following criteria called for in the Commemorative Works Act:

- 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

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 the Memorial, 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, NCPC’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.

The L'Enfant Plan, Union Station, and Columbus Fountain are listed as historic resources in the NRHP. Because this project is a federal undertaking, NPS is required to take into account potential adverse effects on 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 formally began the Section 106 consultation process on February 17, 2005. 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.

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" (NPS, 2006a; NPS, 2006b, 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, including the Memorial, to pre-development levels in order to protect water

resources. The Memorial's compliance with these stormwater requirements were reviewed in the preparation of 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 Memorial in Section 1.6.1.

Executive Order 11593 – Protection and Enhancement of the Cultural Environment

This Executive Order directs NPS to support the preservation of cultural properties, 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 Memorial to ensure that actions regarding cultural properties are consistent with Executive Order 11593.

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. The Memorial was reviewed for compliance with these requirements as part of the preparation of this EA.

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 Memorial’s strategies to meet these goals through stormwater management.

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

Director’s Order 12 (NPS, 2006a) and its accompanying handbook outline 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 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 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.

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. *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. Although the location of the Memorial is not specifically identified in the plan, the policies for new memorials state that new memorials should be located along major avenues and Special Streets and that they must not encroach on neighboring memorials and open space. The *Memorials and Museums Master Plan* also states that memorials and museums should enhance the image and identity of their surroundings, and that new memorials should take advantage of existing infrastructure, especially public transportation.

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. It looks to the L'Enfant and McMillan Plans to preserve and enhance the image and identity of the national capital region. The Comprehensive plan calls for small urban parks to be maintained as designed landscapes with fountains, memorials, and other elements of civic art and to enhance historic designed landscape parks (including triangles) associated with the L'Enfant Plan.

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 contains policies and maps that guide local government and private development in Washington, DC. The Comprehensive Plan calls for triangle parks to be neighborhood amenities and to be designed in a way that mitigates stormwater runoff from adjacent corridors.

The Central Washington Area Element identified a number of goals for the area that includes the National Mall. 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.

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.”

CapitalSpace: 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. 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.

- Develop a coordinated management approach for small parks.

1.4 SCOPING

NEPA Scoping Process

As part of the preparation of this EA, and building upon the site selection EA prepared in 2008, appropriate government agencies, public organizations, and interested citizens were contacted and informed about the project. Notices were placed in NPS's Planning, Environment, and Public Comment (PEPC) website and distributed via the NPS email list. 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
- NCPC
- NCMAC
- CFA
- DC SHPO

In addition, a public scoping meeting was hosted on November 17, 2011, to convene the interested parties and generate further discussion of issues. Staff from the DC Office of Planning, CFA, NPS, the Ukrainian Embassy, and UCCA, as well as the designer of one of the alternatives, attended the meeting. Comments received focused on the pedestrian experience, potential public safety concerns from the height of sculptural elements, potential maintenance concerns, and specific design elements. NPS, the Ukrainian government, and UCCA considered all scoping comments in the preparation of this EA. The comments are identified in Section 1.5: Issues and Impact Topics, as well as more fully summarized in Appendix B.

1.5 ISSUES

Several key issues were identified during the scoping process:

- *Pedestrian experience.* Comments expressed concern that the pedestrian experience along F Street be maintained, stating that the open character of the site should remain. Conversely, other comments expressed support for a design that provides a visual barrier from the Memorial to the businesses across F Street in order to enhance the memorial experience.
- *Public safety.* Due to public safety concerns, comments noted that the District of Columbia open space requirements prohibit elements higher than 42 inches.
- *Context.* Comments received indicated that the Memorial site should be considered as part of a Massachusetts Avenue corridor of parks. Additional comments noted that street trees should conform to the city's existing pattern of street trees.
- *Maintenance.* Comments suggested certain paved surface materials might present maintenance concerns.
- *Sustainability.* Comments noted that the Memorial designs should incorporate low-impact development techniques to reduce the environmental effect of the Memorial.
- *Message.* Comments stated that the Memorial should effectively convey the plight of the victims of the Ukrainian famine-genocide. Specifically, many of the comments stated that they preferred the design that most powerfully conveys the message of the Memorial.
- *Resource topics.* Comments requested that the effects on surrounding historic properties and the L'Enfant Plan; parking displacement, pedestrian and bicycle circulation, and land and sidewalk closures; and vegetation, stormwater, construction noise, and air quality be analyzed.
- *Review of NCPC actions and policies.* Comments asked that each alternative be evaluated for conformance with the measures outlined in NCPC's 2008 Site Selection FONSI and with the Comprehensive Plan for the National Capital, Federal Elements.

1.6 IMPACT TOPICS ANALYZED IN THIS EA

A number of impact topics were identified for the 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 2008 *Memorial to Victims of the Ukrainian Famine of 1932-1933 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's design, and are therefore dismissed from consideration in this EA. Other resource areas, such as cultural 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. The archeological potential of the project area was assessed in a Phase 1A Archeological Assessment (NPS, 2012), which determined that the history of fill and construction disturbance at the site makes it unlikely that archeological remains would be encountered. No cultural landscapes, museum collections, or ethnographic resources would be impacted. Therefore, archeological resources, cultural landscapes, museum collections, and ethnography have been dismissed from further analysis (see Section 1.6.1 for dismissal).

Historic Structures and Districts

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. In addition to the project site

itself, which is a contributing element to the L'Enfant Plan, the project site is bordered by Massachusetts Avenue, a major L'Enfant axis, and F and North Capitol Streets, which are also identified in the L'Enfant Plan. 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 or in the vicinity of the site are listed in the NRHP. Therefore, historic resources are addressed as an impact topic in this EA.

Visitor Use and Experience

The site, a turf-covered triangle park, is currently used as open space. It offers passive recreation opportunities for passers-by, but does not have visitor amenities, such as shade or seating. The Memorial would increase visitor use at the site over current levels and intensity and alter the recreation opportunities at the site. Therefore, visitor use and experience is considered an impact topic.

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 “non-attainment” areas; 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.

Due to the limited potential grading area, the limited duration of construction equipment use, and the negligible 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.

Archeological Resources

The project site is in the vicinity of Tiber Creek, around which Native American settlements are known to have existed. Urban development around the site occurred in the 18th century as part of the L'Enfant Plan, and continues to the present. In its early development, the site itself was originally part of the street grid. Over time, the site was covered by fill and has remained undeveloped. Alluvial deposits could have led to the preservation of prehistoric archeological sites and features in this area. Beneath the layer of fill, archeological remains from the 18th or 19th centuries may be preserved. However, due to the depth of fill and the approximate construction disturbance to a depth of three feet, these potential remains would be unlikely to be encountered. Therefore, this topic was dismissed from further analysis.

Cultural Landscapes

No cultural landscapes are located within the APE, as defined in Section 3.1. As a result, the Memorial would not have any effects on cultural landscapes, and would therefore have no impact on cultural landscapes. Therefore, this 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 Memorial would not have any effects on recognized museum collections (historic artifacts, natural specimens, and archival and manuscript material). As a result, the Memorial would not have an impact on museum collections. 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.”

Although there are residential populations in the immediate vicinity of the site, the proposed action would not impact the area’s demographic composition. Environmental Justice populations would not be directly affected by the proposed action, and it is highly unlikely that the project would introduce materials into the environment that would have indirect adverse health effects or impact the economic conditions of low income populations. Thus, Environmental Justice was eliminated from detailed analysis.

Human Health and Safety

Because the Memorial would be bound by roads on three sides, 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. Due to its location along Massachusetts Avenue and F Street, emergency responders would

have adequate access. The issue of pedestrian safety is addressed under the impact topic of visitor use and experience. Additionally, the Memorial would comply with the Architectural Barriers Act, enabling those with disabilities or specific access needs to experience the Memorial

The staging of the Memorial construction would be conducted on-site. Fencing would be used to limit access to the staging and construction areas during the construction. 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 Memorial, the existing land use is open space. The Memorial would continue use of the site as open space, providing a more park-like setting with seating and enhanced landscaping. The use of the site as a memorial was addressed in the *Memorial to Victims of the Ukrainian Famine of 1932-1933 Site Selection EA* (VVMF and NPS, 2006), which identified a beneficial impact on land use for project site and vicinity. Memorial designs are consistent with the Commemorative Works Act, the Memorials and Museums Master Plan, the Comprehensive Plan for the National Capital, and other plans and policies.

Specifically, under the Comprehensive Plan for the National Capital, Federal Elements, there are four elements that apply to the Memorial: historic preservation, environmental protection, transportation, and parks and open space. Under the historic preservation element, policies for the national capital image focus

on the visual character of the city and ensuring that new development with the District of Columbia is compatible. Policies for the stewardship of historic properties focus on identifying, maintaining, adaptively reusing, and preserving such properties. Finally, the policies related to the historic plan of Washington, DC identify ways to protect and embellish the L'Enfant Plan. Due to its location, modest scale, and quality materials, the Memorial would be in keeping with these policies. Furthermore, the potential impacts on historic properties are considered in Section 4.2: Cultural Resources in this EA.

The federal environment element focuses on air and water quality; water supply; land resources, including floodplains, soils, and vegetation; and human activities, such as environmental justice. Through the use of on-site stormwater treatment (stormwater would be sloped toward vegetation and absorbed on-site), increased tree canopy, ambient lighting, and construction techniques that comply with local noise ordinances, the Memorial would be consistent with these policies.

The transportation element covers a wide variety of transportation issues, ranging from transit to parking to bicycle facilities. Overall, the goal is to develop and maintain a multi-modal regional transportation network. The Memorial would not result in long-term changes to transportation facilities or services in the area due to the Memorial's compact design that is wholly within an existing open space, and is therefore in keeping with the transportation element.

The parks and open space element is designed to preserve the key natural resources in the area and provide sufficient parks and recreation areas, preserve the nature and diversity of the natural

and cultural heritage, and use open space to help guide urban growth. Specifically, the element includes policies that restore, protect, and enhance the historic designed landscape parks (squares, circles, and triangles) associated with the L'Enfant Plan and to maintain small urban parks primarily as historic parks and designed landscapes with memorials and other features of civic art. The Memorial project site is currently a turf-panel open space within the L'Enfant City. The proposed Memorial would continue the use of the site as open space, and enhance the site by the addition of a designed landscape and a work of civic art, consistent with these policies. Therefore, this topic was dismissed from further analysis.

Noise

The primary source of ambient noise (the combined sound from all noise-producing sources in a given area) in the area around the project site is vehicular traffic and human voices, although trains at Union Station are frequently audible. Overall, ambient noise in the area around the project site is typical of such noise in a moderately-dense urban environment. The District of Columbia's noise control code (Title 20, Chapter 20-27 and 20-28) states that for areas zoned commercial or light manufacturing, such as the project site, noise may be no louder than 65 dBA during the daytime and no more than 60 dBA during the evening. From 7:00 a.m. to 7:00 p.m., construction noise levels may not exceed 80 dBA, unless granted a variance.

Noise generated by the use of the site would primarily be human voices. Because the site is a Memorial and would not include active recreation, it is anticipated that such noise would be similar to existing conditions and within the existing allowed volume. During

construction of the site, construction equipment may generate noise at levels higher than the existing conditions, but within the limits allowable for construction. This condition would be temporary in nature. Therefore, noise was dismissed as an impact topic.

Park Operations and Management

Operation and management of the Memorial would be more intense than the current site use. However, the day-to-day operation and management of the site would be transferred from NPS to the Ukrainian government and UCCA. NPS would monitor the maintenance activities, resulting in minimal changes to staffing and budget. Therefore, this topic was dismissed from further analysis.

Socioeconomics

Socioeconomics, or community facilities and services, were addressed as part of the *Memorial to Victims of the Ukrainian Famine of 1932-1933 Site Selection EA* (NPS 2008), and it was determined that the Memorial would not significantly affect parks and recreation facilities, cultural facilities, public safety, or educational facilities. The Site Selection EA stated that the Memorial would enhance the overall cultural facilities in the vicinity of the site. Implementation of the Memorial could provide temporary beneficial impacts on the local economy resulting from minimal increases in employment opportunities from the construction of the site. Therefore, socioeconomic resources were dismissed as an impact topic.

Soils

The land comprising the project site is relatively flat, with an overall elevation of about 36 feet above mean seal level. Centuries of urban development has left few, if any, undisturbed soils in and around the study area. Open space, consisting of a turfgrass panel, comprises approximately 3,035 s.f. (0.07 acre) of the site. While construction-related activities would temporarily increase the potential of erosion, there would be minimal long-term effects on soils on the site. Therefore this topic was dismissed from further analysis as an impact topic.

Vegetation

The existing vegetation in and around the project site is the result of more than 200 years of urban development and bears no resemblance to the native vegetation patterns characteristic of the Atlantic Coast Plain and Piedmont provinces. The downtown area of Washington, DC is highly urbanized with very little open space for lawns or trees. The *Memorial to Victims of the Ukrainian Famine of 1932-1933 Site Selection EA* (VVMF and NPS, 2006) determined that impacts to vegetation and land cover were not anticipated. The Memorial site has approximately 3,035 square feet (0.07 acre) of available area for vegetation to grow. Currently the site's open space is an established mixture of turfgrass that is not native to the Washington D.C. area and two trees, a southern magnolia and a sweet bay magnolia. Surrounding the Memorial site are five street trees of various age and size. The street trees are owned by the District. Those in compliance with the District's street tree standards would be preserved during the construction process, while those street trees not in compliance would be removed. While construction-related activities would permanently remove the

turfgrass on the site, both alternatives would have a net gain in trees as a result of the implementation of their respective landscape plans and would provide a larger tree canopy than current conditions. Therefore this topic was dismissed from further analysis as an impact topic.

Threatened, Endangered, Rare, and Special Concern Species and Migratory Birds

This topic was addressed as part of the *Memorial to Victims of the Ukrainian Famine of 1932-1933 Site Selection EA* (VVMF and NPS, 2006). The project site is located in a highly urbanized area dominated by hardscape and buildings, with much vehicular and pedestrian traffic. The project site itself contains less than one acre of turf and two trees that provide limited habitat to wildlife urban wildlife, such as squirrels. There are no rare, threatened, or endangered species or migratory birds, or their habitat, known or expected to occur in the project area. Therefore, this impact topic was dismissed from consideration.

Transportation Systems

Three roadways bound the project site: Massachusetts Avenue, North Capitol Street, and F Street. Massachusetts Avenue and North Capitol Street are principal arterial roadways. East of 1st Street and adjacent to the project site, F Street is a one-way eastbound roadway. Between 1st and 2nd Streets, F Street is a pedestrian way. Deliveries or other construction activities may result in temporary lane closures, although these would take place during off-peak traffic periods. Should such lane closures be needed, efforts will be made to have deliveries made along F Street, rather than the busier Massachusetts Avenue. Although some vehicular trips may occur as

a result of the Memorial at its opening and for occasional special events, it is anticipated that the Memorial would not result in sustained changes to vehicular traffic.

Metered parking is available adjacent to the site along F Street throughout the day, and along Massachusetts Avenue except between 4:00 and 6:30 p.m. During construction, a relatively small number of parking spaces may be temporarily removed for staging or deliveries, causing motorists to search for parking along neighboring streets or to use parking garages in the area. Over the long-term, the implementation of the Memorial would not change parking adjacent to the site.

Bicycle access is available very near the site. Capital BikeShare operates a station on F Street directly west of the project site and a station adjacent to Union Station. Bikestation Washington DC offers bicycle parking rentals, repairs, and changing facilities at Union Station. No dedicated bicycle lanes are located on streets adjacent to the Memorial; cyclists must share the road with traffic or utilize sidewalks. The Memorial would not permanently alter the existing bicycle facilities. Temporary lane and sidewalk closures may occur during the construction of the Memorial. Cyclists would be directed to other lanes or sidewalks during that period by signs or other communication. Signs would be used to direct users to the adjacent Capital BikeShare station on F Street during construction. Pedestrian access and circulation is addressed in Section 4.3: Visitor Use and Experience. Therefore, this impact topic was dismissed from further analysis.

Unique Ecosystems, Biospheres Reserves, or World Heritage Sites

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

Utilities and Infrastructure

Utilities and infrastructure was addressed as part of the *Memorial to Victims of the Ukrainian Famine of 1932-1933 EA* (NP, 2008). At that time, it was determined that the Memorial would not require new utility connections, and because no utilities currently serve the site, short-term disruptions of service due to construction would be minimal. Additionally, the 2008 EA identified the increase of impervious surface area as having the potential for increased stormwater run-off and encouraged the use of permeable paving materials. Under the proposed Memorial design, the amount of impervious surface would increase, but would be sloped to direct stormwater run-off toward vegetated areas for absorption. This method would treat all stormwater on-site and would have no impacts on the existing utilities. Therefore, utilities and infrastructure were dismissed from further analysis as an impact topic.

Water Resources

There are no bodies of water located at the project site. The closest water body is the Washington Channel, which is located approximately 1.5 miles from the project site. The Memorial would include excavation to a depth of approximately three feet, and would therefore be unlikely to encounter groundwater due to the estimated 25 feet of fill that was introduced to the site at the time of Union Station's construction.

Impervious surfaces cover approximately 43 percent of the existing project site (including the sidewalks up to the curbs). Depending upon the action alternative, impervious surface coverage at the project site would increase to approximately 64 to 69 percent of the area. In order to comply with DC stormwater regulations, the Memorial would treat stormwater on-site by grading paved surfaces to redirect stormwater to vegetated areas, which would then absorb the water. Before construction, a stormwater management plan would be submitted to the DC Department of the Environment for approval.

According to FEMA Flood Insurance Rate Map #1100010019C, dated September 2010, the project site is located outside the 100-year (one percent annual chance flood hazard) and 500-year (0.2 percent annual chance flood hazard) floodplains. Because the Memorial is outside the 100-year and 500-year floodplain, NPS would not require a statement of findings for this project, consistent with Director's Order 77-2, Floodplain Management. Therefore, this impact topic was dismissed from further analysis.

Wetlands

Wetlands are defined by three characteristics: hydrophytic vegetation, soils inundated or saturated for more than 12.5 percent of the growing season, and hydric soils. Given that the project site is located in an urban setting with no indicators for the presence of wetlands, this topic was dismissed from further analysis.

2.0 ALTERNATIVES

This page intentionally left blank

2.1 INTRODUCTION

The proposed action is the review and approval of design, construction, and operation of a memorial to victims of the Ukrainian famine-genocide that took place in 1932 -1933. The project site, which under NPS jurisdiction, is a triangle park bound by Massachusetts Avenue, F and North Capitol Streets, and a small building now used as a bank (Figure 2-1). This EA evaluates a range of alternatives related to the proposed Memorial, including two action alternatives and a No Action Alternative. This section defines the No Action Alternative, describes the alternative designs for the Memorial, identifies the preferred alternative, and summarizes the environmental impacts and mitigation measures for each alternative.



Figure 2-1: Project site
Source: Google, 2011

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 features of the 3,118 square foot site (Reservation 78) would remain in their current condition and use, as illustrated in Figure 2-2. This would include visitor use, management of the site, and existing vegetation. The District of Columbia would continue to maintain the adjacent sidewalks, which total approximately 3,570 square feet.

Under the No Action Alternative, NPS would continue to manage and operate the site (as shown in Figure 2-2), continuing its current management practices to maintain the site, such as mowing. The existing open space would still be used as open space, allowing pedestrians to access the site from the surrounding sidewalks. The existing flagpole would remain at the site.

The existing vegetation would continue at the site. The street trees along Massachusetts Avenue would stay, as would the street trees along F Street. The two trees located within the site, a southern magnolia and a sweet bay magnolia, would also remain. Grass, which covers most of the site, would remain as the primary groundcover.

Under the No Action Alternative, the existing sidewalk, which is maintained by DDOT, would continue at its existing location. The existing rolled curb marking the site boundary would also remain, including the area partially covered by soils and grass. The portion of the grass panel that extends between the site boundary and the

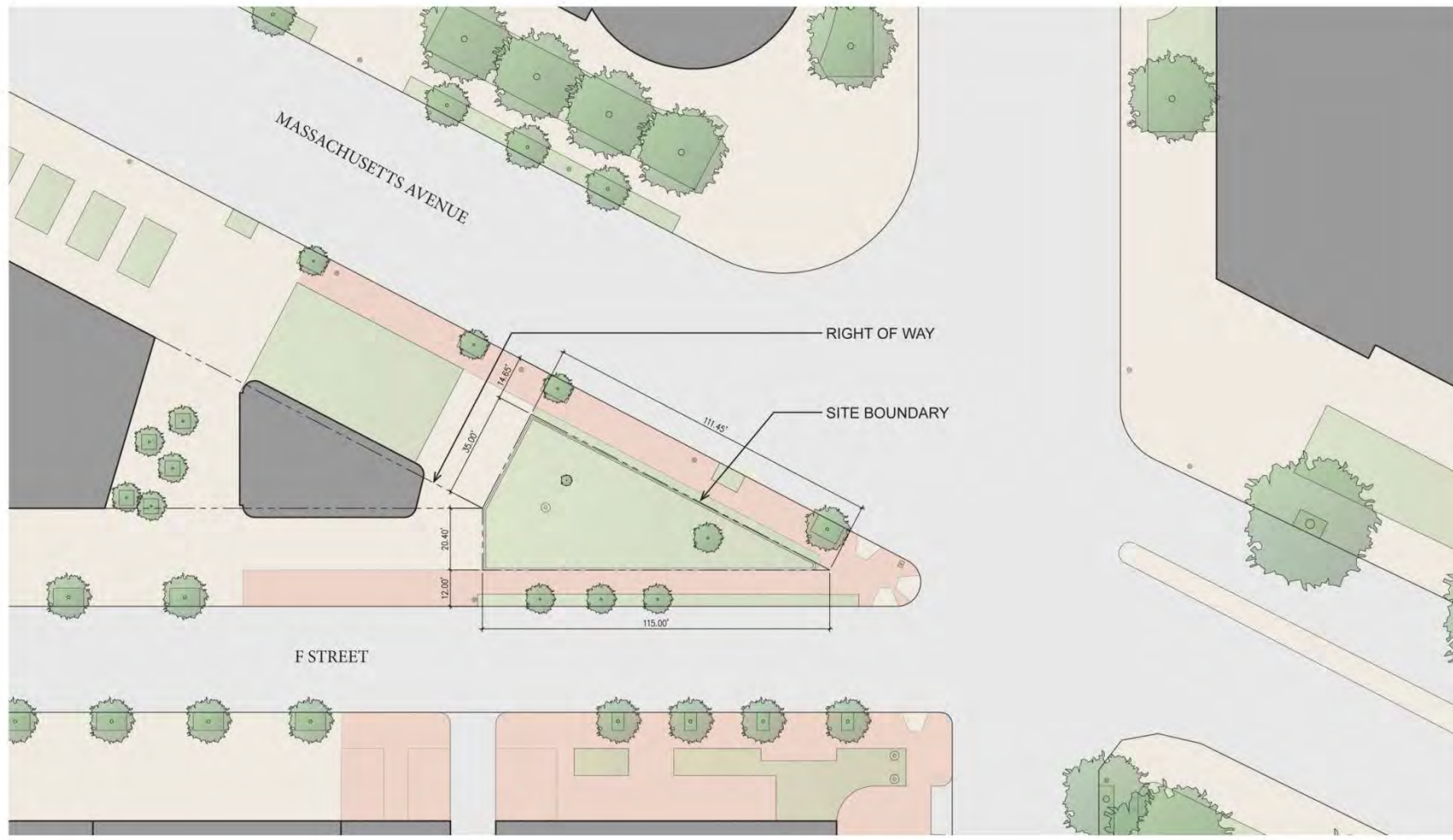


Figure 2-2: No Action Alternative existing conditions
Source: Hartman-Cox Architects

existing sidewalk along Massachusetts Avenue would remain, maintaining the existing turf-covered gap between the NPS property line and the sidewalk. The total amount of impervious surface at the site would remain at 2,907 square feet, or approximately 43 percent of the site (including sidewalks), while vegetation would make up the 3,781 square feet, or 57 percent.

2.2.2 ELEMENTS COMMON TO ALL ACTION ALTERNATIVES

Each of the two action alternatives would establish and operate a memorial dedicated to the victims of the Ukrainian man-made famine in 1932-1933. The action alternatives represent two distinct design concepts for the Memorial. Although most elements are specific to each design concept, there are several design features common to both action alternatives.

Ukraine experienced a devastating famine in the early decades of the 20th century. Unknown to many in the world at that time and even today, the famine was an engineered-famine, induced by the totalitarian regime of Josef Stalin in the Soviet Union between 1932 and 1933. During the famine, 7 to 10 million Ukrainians were deliberately and systematically starved to death by the Soviet Union. To bring a greater awareness of the Ukrainian famine to the world, the Ukrainian government sought to build a memorial in Washington, DC to honor the victims of this largely unknown holocaust. Today, this gesture of goodwill to be presented to the American people will signify the relevance of Ukraine's tragedy 75 years ago. America's long-standing role as the foremost champion of human rights in the world makes Washington, DC the best location for a memorial to these victims.

Memorial Design

Both action alternatives would feature a sculptural element with a plaza, interpretive information, and landscaping. These are described below.

- *Sculpture.* The sculpture would be the focus of each alternative. Under Alternative 1, the sculptural element would be a linear sculpture placed along the southern edge of the site, parallel with F Street. Under Alternative 2, the sculpture would be centered at the site.
- *Plaza.* A paved plaza would be created at the site. The plaza would provide gathering space and offer seating. Under Alternative 1, the hardscape plaza would be linear, crossing the site east to west, parallel to the sculptural element. Under Alternative 2, the plaza would be more circular, reflecting the central location of the sculptural element.
- *Interpretation.* Both action alternatives include interpretive information for the visitor. The information would explain the significance of the Ukrainian famine-genocide. Under Alternative 1, the interpretive message would be included in the sculpture itself, as a sidebar, as well as a wayside exhibit. Under Alternative 2, the interpretive message would be provided through a wayside exhibit at the Memorial.
- *Landscape.* Each action alternative would create a designed landscape at the site. Both alternatives include two landscape panels divided by a hardscape plaza. Under Alternative 1, the landscape panels would be north and south of the linear plaza and sculpture. The northern landscape panel would be low-maintenance groundcover, while the southern landscape strip would be lined with trees and shrubs. Under Alternative 2, the landscape

panels would be east and west of the central plaza. On the western landscape area, three trees would be located; on the eastern landscape area, there would be two trees with groundcover below.

- *Right-of-way.* The action alternatives would extend the existing sidewalk of Massachusetts Avenue approximately 2.5 feet to the reservation lot line, currently represented by a rolled curb, much of which along Massachusetts Avenue is covered by turf. The existing rolled curb would be repaired and restored to surround the site.

Sustainability

Low-impact development techniques would be incorporated into the design of the Memorial under both alternatives. No new lighting would be installed at the site. Instead, ambient lighting from nearby existing lights and buildings would be used. To address stormwater generated by the hardscape at the site, the paved plaza would be sloped toward the vegetated portion of the site. The stormwater would then be absorbed into the ground.

Operation and Maintenance

Once constructed, the Ukrainian government and UCCA would maintain and operate the Memorial. This would include maintaining the sculpture and plaza. In addition, maintenance and operation would include mowing and care of the landscape. No park rangers would be stationed at the site.

2.2.3 ALTERNATIVE 1: FIELD OF WHEAT

Alternative 1 features a sculptural panel with a hardscape plaza and designed landscape. The six-foot-high sculpture is a bronze relief of a field of wheat that extends approximately 35 feet in length (Figure 2-3 through Figure 2-6). The wheat, which initially appears raised from the vertical plane, gradually recedes as a negative imprint into the sculpture. The visual disappearance of the wheat symbolizes the transition from an ample harvest to a horrible deficit. The words HOLODOMOR 1932-1933 would extend from the wall. The sculpture would be placed on a granite plinth of approximately 1.5 feet for a combined height of 7.5 feet and would be backed by a granite wall. The granite wall would bend at wide angle and contain an interpretive panel. Along the rear (southern) side of the sculpture that faces F Street, vertical stone panels will contain elements of visual interest, such as texture or a designed element.

A linear plaza would be located north of the sculpture, extending the length of the memorial site. The paved plaza, which would be approximately sixteen feet wide and would mimic the angle of the sculptural panel, would be of slate or other stone materials. The plaza would connect the concrete sidewalk west of the Memorial, Massachusetts Avenue, and F Street, allowing entry from each direction. The arrangement of the stone would be designed to evoke the image of plowed rows of wheat. A stone bench would be located directly across from the sculpture. In addition to the interpretive panel that is incorporated into the backdrop wall, an interpretive panel with additional information would be placed near the Memorial entrance from Massachusetts Avenue.

The landscape of the site would feature two vegetated areas. The southern vegetated strip, which lies along F Street, would contain a

row of approximately eight trees to serve as a backdrop to the sculpture. Shrubs in this planting area would provide additional vegetation. To the north of the plaza, primarily along Massachusetts Avenue, low-maintenance ground cover would allow for open views to the Memorial. Including sidewalks, vegetation would comprise 2,086 square feet of the site (approximately 31 percent), while impervious surfaces (including sidewalks) would comprise 4,602 square feet of the site (approximately 69 percent).

The streetscape treatment under Alternative 1 would remain largely intact. Along Massachusetts Avenue, the sidewalk would extend south to the edge of the NPS property, replacing the existing turf between the sidewalk and roll curb.



Figure 2-3: Alternative 1 elevation

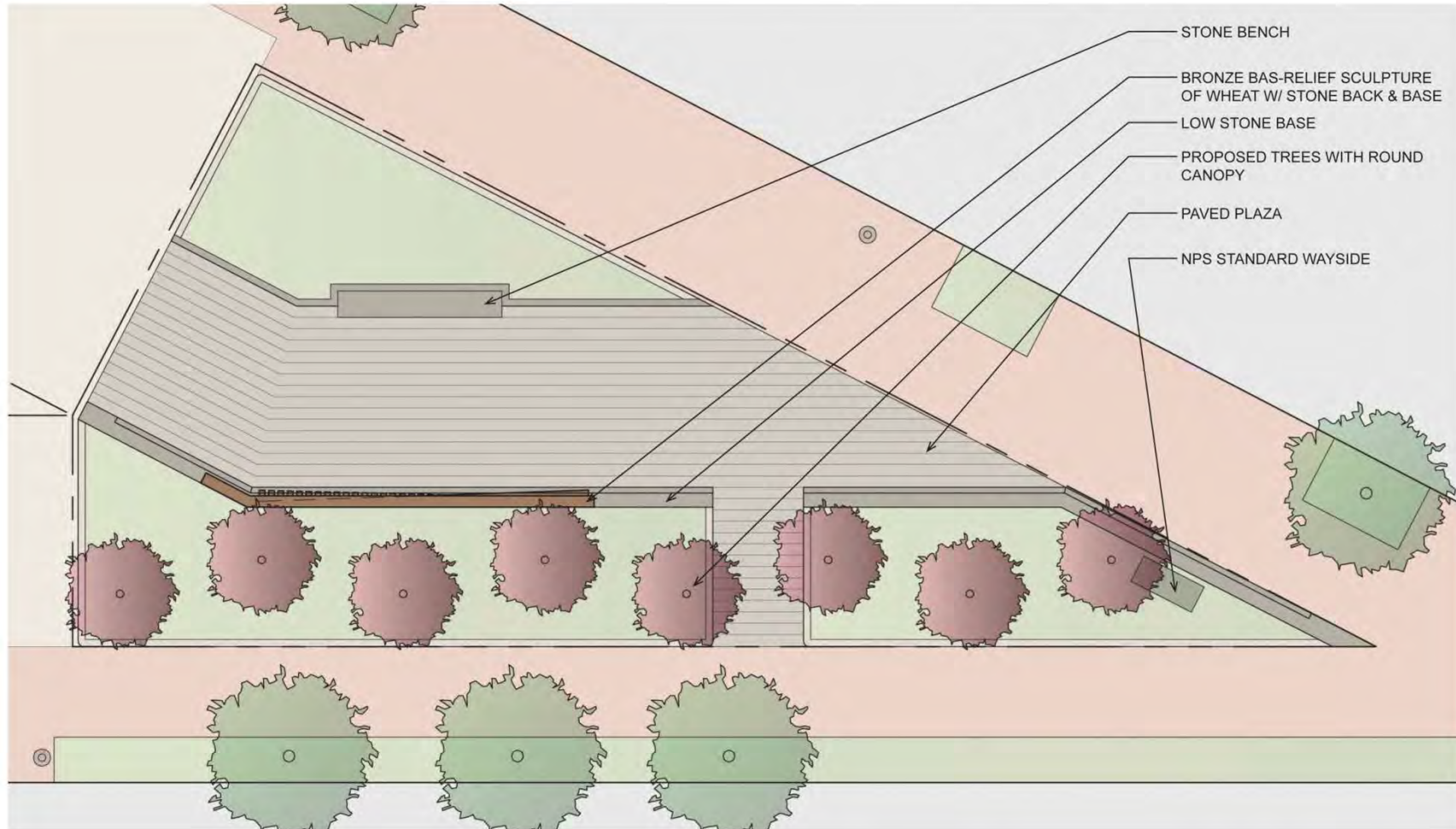


Figure 2-4: Alternative 1 site plan



Figure 2-5: Alternative 1 perspective from Massachusetts Avenue



Figure 2-6: Alternative 1 site section

2.2.4 ALTERNATIVE 2: SHOOTING HANDS

Alternative 2 would feature a central sculpture as focus of the Memorial. A bronze sculpture would feature an empty pair of hands, illustrating pleading for food (Figure 2-7). The sculpture would stand upon a granite base of approximately ten feet in diameter, and would generally be oriented toward Massachusetts Avenue. When combined with the base, the sculpture would total approximately ten feet in height. Due to its central location within the plaza, the sculpture could be viewed on all sides (Figure 2-8 through Figure 2-10). However, the east side of the sculpture is oriented to catch the view from the north/northwest, and the west side is oriented to catch the view from the north/northeast.

The plaza would be a large circular paved area with access to Massachusetts Avenue to the north and F Street to the south. The plaza would be of granite. Three stone benches, also of granite, would be located along the periphery of the plaza to provide seating. A wayside exhibit would be located near the plaza entry along Massachusetts Avenue. The existing sidewalk would be extended to the site boundary, removing the portion of turf found between the existing sidewalk and the site boundary (marked by a rolled curb).

The landscape of the site is designed to provide shade for visitors to the Memorial, particularly those sitting on benches. Three trees would be placed west of the plaza, while two trees would be located east of the plaza. The trees, which would be beech or hornbeam, are native to Ukraine and can also be found in the United States. The four adjacent street trees would remain. Vegetation would account

for 2,416 square feet of the site (approximately 36 percent), while impervious surface would total 4,272 square feet (approximately 64 percent), including sidewalks.



Figure 2-7: Alternative 2 elevation of sculpture

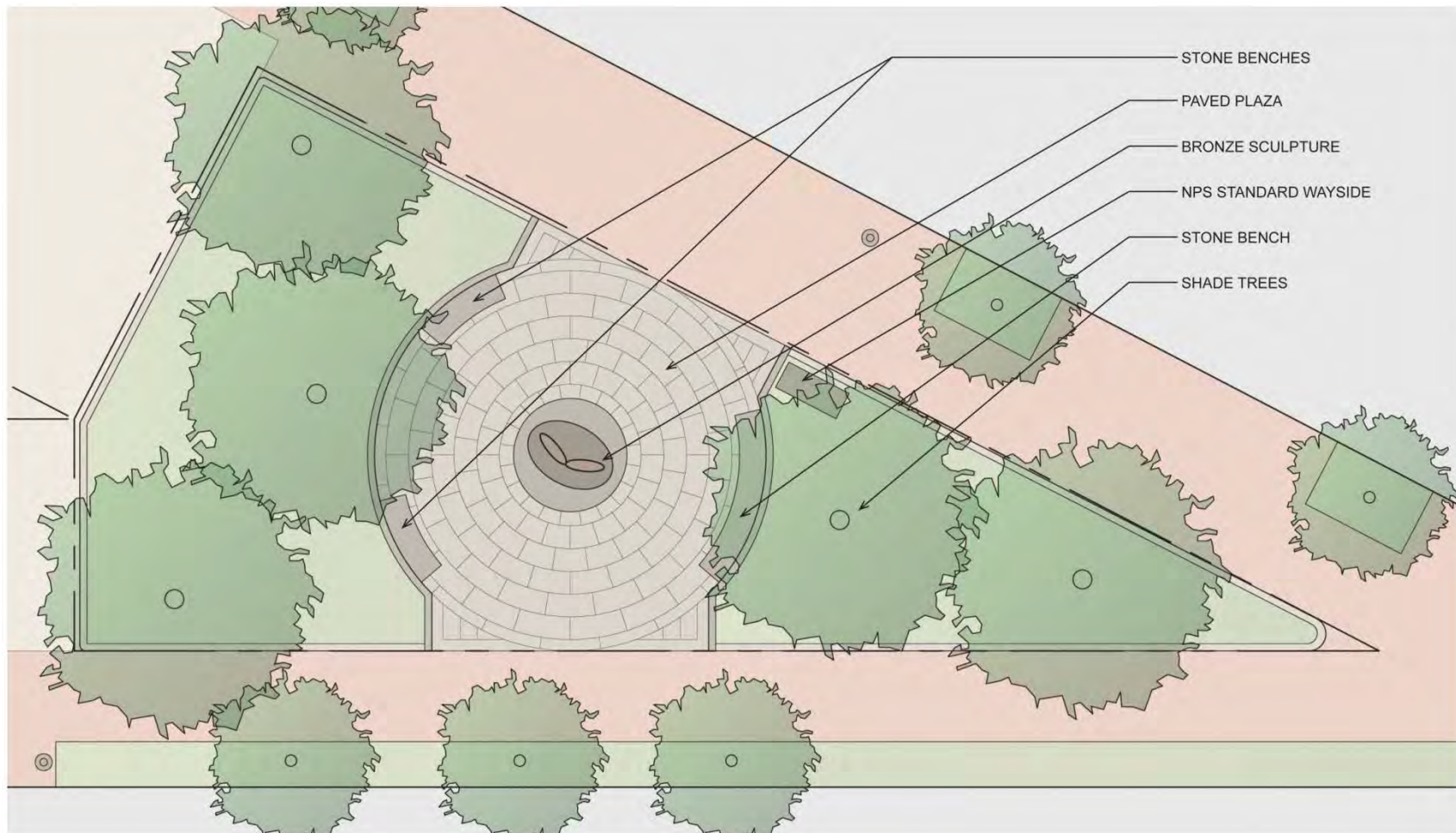


Figure 2-8: Alternative 2 site plan



Figure 2-9: Alternative 2 perspective from Massachusetts Avenue

Note: The rendering does not contain the full detail of sculpture. It is intended to illustrate the relationship to the site, context, and visitors.



Figure 2-10: Alternative 2 site section

2.3 IDENTIFICATION OF THE PREFERRED ALTERNATIVE

NPS and the Ukrainian government have identified Alternative 1 as the preferred alternative. Alternative 1 provides the best design to convey the message of the events of the famine-genocide that occurred in 1932-1933. Its depiction of wheat is most relatable to visitors and the incorporation of interpretive material into the design enables Alternative 1 to inform the public of the famine-genocide, as is indicated by the numerous comments received via scoping expressing support for the Field of Wheat design. Although the sculpture would alter the vista along F Street, the Memorial's alignment along F Street and partial alignment with Massachusetts Avenue more successfully respect the Massachusetts Avenue right-of-way.

Alternative 2 would also meet the purpose and need of the project. However, the design of Alternative 2 would result in greater impacts on historic resources due to the placement of trees. The sculpture's location would be within the Massachusetts Avenue right-of-way. The sculpture would not be in alignment with the apex of the site nor with the former Childs Restaurant Building, and would therefore not relate as well to the context of the site.

2.4 CONSTRUCTION STAGING

Staging for the construction of the Memorial will take place on site. On-site support staff will be positioned in temporary trailers with a lay down area at this location. Minimal lane closures of F Street or Massachusetts Avenue would occur in order to deliver materials to the site. Such closures would be infrequent and temporary in nature, and would occur during off-peak hours to avoid traffic lane closures. Efforts would be made for deliveries to take place on F Street, rather than the busier Massachusetts Avenue. Additionally, short-term closures of sidewalks may occur. Temporary fencing or other barriers will be installed for safety purposes.

2.5 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 the 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.

The 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 result:

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.
- Landscaping at the Memorial would utilize tree species that allow filtered views through their foliage.
- Landscape trees at the Memorial would be placed at locations that do not block views of the Child's restaurant entry from Union Station and from adjacent streets.

Visitor Use and Experience

If during construction, sidewalks and travel lanes are closed, signage would be placed in appropriate locations to redirect visitors around the site. Similarly, if construction obscures the visibility of the Capital Bikeshare station of F Street west of the project site, signs would be placed to help direct people to the station.

2.6 RELATIONSHIP TO THE NCPC SITE SELECTION MITIGATION MEASURES

As mentioned in Section 1.3, NCPC included in its 2008 FONSI and approval of the Memorial site a series of mitigation measures. The approval of the site was “contingent upon the applicant’s adherence to the following measures outlined as mitigation in the Executive Director’s Finding of No Significant Impact for the site selection.” The following is a discussion of each action alternative’s consistency with the prescribed mitigation measures. In addition to the design-related mitigation measures, NCPC required a Phase 1 archeological analysis be conducted prior to construction. This document is currently underway, with preliminary findings informing the archeology discussion in Section 1.6.1 of this document.

Alternative 1

To protect park and visual resources and the socio-economic environment, the design must:

- a. *First create a successful and functional public space that befits the site’s prominence in the National Capital and embraces its natural openness and place within significant L’Enfant rights-of-way. Any free-standing memorial element must be secondary in nature.*

Alternative 1 would replace an open turf panel, flagpole, and two trees with a plaza, open turf panel, and linear sculpture. The entire length of Massachusetts Avenue border to the site would remain visually open. On F Street, the 7.5-foot tall linear sculpture would extend approximately 35 feet, or one third the length of the site. A row of trees would be aligned along the

length of the F Street border, with a break provided approximately 40 feet from the apex of the site to allow for pedestrian entry. The scale of the linear Memorial sculpture would be secondary to the functional public space of the Memorial.

- b. *Respect the scale of the site and incorporate an understated design, as defined for representative sites of similar size and position in the Memorials and Museums Master Plan.*

Under Alternative 1, the Memorial would be of a modest scale- the linear sculpture would be approximately six feet in height, and would extend approximately 35 feet. The design would be at a pedestrian scale and would not overpower the existing urban context of the site.

The Memorials and Museums Master Plan states that memorials should reinforce key design features of the L’Enfant and McMillan Plans, including major streets and avenues. It also states that new memorials must not encroach on neighboring memorials and open space. Alternative 1 would be located along Massachusetts Avenue, a major L’Enfant avenue. The Memorial defers to the avenue by placing the linear sculpture at the southern portion of the site. The Memorial design also provides open space through a turf panel and plaza area.

- c. *Incorporate significant green elements.*

Alternative 1 is a landscape design solution that would install approximately seven trees on site. The design also includes a turf panel and a vegetated strip. The vegetated area within the site boundary would make up 1,486 square feet, or

approximately 47 percent . Including sidewalks, vegetation would comprise 2,086 square feet of the project area (approximately 31 percent)..

- d. *Integrate the site's apex with the small historic building to the west and with the rest of the block.*

The linear sculpture has a bent panel that is approximately aligned with the Massachusetts Avenue build-to line, which marks the end of the right-of-way, and the northern façade of the former Childs Restaurant building. It should be noted that the Childs Restaurant building actually extends three feet into the Massachusetts Avenue right-of-way. Additionally, the placement of the sculpture and the landscape design allow views between the site's apex and the entrance to the former Childs Restaurant Building.

- e. *Remain open and integrated into the surrounding built environment and rights of way and remain accessible to passers-by.*

A portion of the linear sculpture would be approximately aligned with the Massachusetts right-of-way and the former Childs Restaurant building. The site would be accessible along Massachusetts Avenue and F Street, from an entry point on F Street, and via the plaza in front of the former Childs Restaurant. Along with the access points, the distance of approximately twelve feet between the sidewalk and sculpture would allow for an overall open character of the site and of the pedestrian experience along F Street.

- f. *Respect the building lines of the surrounding rights of way, particularly along Massachusetts Avenue. If a vertical element is anticipated, orient its center along the building lines of Massachusetts Avenue and avoid vertical elements in the approximately 30 foot space from the building lines to the Reservation edge (40 feet from the building line to the curb along Massachusetts Avenue); if a more horizontal feature is anticipated, retain a low profile, which respects the Massachusetts Avenue right of way and views of the Postal Museum and Union Station.*

Alternative 1 would feature a linear sculpture and base that would be horizontal in nature. At a maximum height of 7.5 feet, its profile would be low. The bent panel would be aligned with the Massachusetts Avenue right of way. The longer portion of the linear panel would extend into the 160-foot right of way by approximately 30 feet. Due to the placement at the site along F Street, views of the Postal Museum and Union station would remain intact.

Alternative 2

To protect park and visual resources and the socio-economic environment, the design must:

- a. *First create a successful and functional public space that befits the site's prominence in the National Capital and embraces its natural openness and place within significant L'Enfant rights-of-way. Any free-standing memorial element must be secondary in nature.*

Alternative 2 would replace an open turf panel, flagpole, and two trees with a central sculpture and plaza and two landscaped areas. The design would create public space that is accessible from both Massachusetts Avenue and F Street, providing an open character. A ten-foot sculpture would be located in the site, but its scale would ensure that it is secondary to the functional public space and context of the Memorial.

- b. *Respect the scale of the site and incorporate an understated design, as defined for representative sites of similar size and position in the Memorials and Museums Master Plan.*

Under Alternative 2, the Memorial would be of a modest scale: the central sculpture and base would be approximately ten feet in height and approximate eight feet in width. The design would be at a pedestrian scale and would not overpower the existing urban context of the site.

The Memorials and Museums Master Plan states that memorials should reinforce key design features of the L'Enfant and McMillan Plans, including major streets and avenues. It also states that new memorials must not encroach on neighboring memorials and open space. Alternative 2 would be located along Massachusetts Avenue, a major L'Enfant avenue. Although Alternative 2 places the sculpture within the Massachusetts Avenue right of way, the location is consistent with other L'Enfant features and open spaces. The Memorial design also provides open space through a plaza and landscaped area.

- c. *Incorporate significant green elements.*

Alternative 2 is a landscape solution that would install approximately 5 shade trees on site. Vegetated area would make up 1,861 square feet within the site boundary, or approximately 60 percent of the site. Including sidewalks of the project area, vegetated area would cover 2,416 square feet of the site (approximately 36 percent).

- d. *Integrate the site's apex with the small historic building to the west and with the rest of the block.*

The central sculpture and plaza lie between the apex and the former Childs Restaurant building, linking the two. Additionally, the plaza provides pedestrian connections to both Massachusetts Avenue and F Street to incorporate the site with the rest of the block.

- e. *Remain open and integrated into the surrounding built environment and rights of way and remain accessible to passers-by.*

Alternative 2 provides an open environment for the Memorial. Pedestrians would be able to access the Memorial on all sides, with plaza entrances along Massachusetts Avenue and F Street. Landscaped areas would also provide open space.

- f. *Respect the building lines of the surrounding rights of way, particularly along Massachusetts Avenue. If a vertical element is anticipated, orient its center along the building lines of Massachusetts Avenue and avoid vertical elements in the approximately 30 foot space from the building lines to the*

Reservation edge (40 feet from the building line to the curb along Massachusetts Avenue); if a more horizontal feature is anticipated, retain a low profile, which respects the Massachusetts Avenue right of way and views of the Postal Museum and Union Station.

With a central sculpture and plaza, Alternative 2 would place a ten-foot element within the Massachusetts Avenue right-of-way, approximately 18 feet from the curb line. Due to its modest height, its location in the right-of-way is consistent with other memorials throughout the city. Views of the Postal Museum and Union Station would be filtered through trees, but would not be blocked by built elements.

2.7 ALTERNATIVES CONSIDERED BUT DISMISSED

Several alternatives or alternative elements were identified during the design process and internal and public scoping. 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:

- Conflicts with already-established Park uses;
- Duplication with other less environmentally damaging alternatives;
- Conflicts with the statement of purposes and need, or other policies; and
- Severe impact on environmental or historic resources.

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

2.6.1 Destroyed Sphere

The Destroyed Sphere concept also placed a sculptural element in the middle of the plaza, similar to Alternative 2. In this design, the sculpture was of a large sphere with a portion sliced off and lying to the side (Figure 2-11). The design would be intended to convey that with such events as the Ukrainian famine-genocide, the people of the world, not just of Ukraine, cannot be whole. It was determined that alternative did not as effectively address the purpose and need of the project as the action alternatives, and was therefore dismissed from further consideration.



Figure 2-11: Destroyed Sphere design

2.6.2 Ritual Cloth

The Ritual Cloth concept featured a piece of cloth attached to a support system (Figure 2-12). A rushnyk, or ritual cloth, is a familiar garment in the Ukrainian tradition used at major life event: birth, marriage, or death. It is a symbol of wisdom and seniority. However, due to the practical limitations of using cloth as part of the Memorial, the design would not be considered permanent, which is in conflict with the NPS policies related to the operation and management of memorials. Therefore, this alternative was dismissed from further consideration.



Figure 2-12: Ritual Cloth design

2.6.3 Tear Drops on a Wheat Field

The Tear Drops on a Wheat Field concept would transform the project's existing grass panel to a field of wheat, which would be replanted each year (Figure 2-13). Within the field, clear crystalline light-filled spheres meant to resemble tear drops would be placed within the wheat field. No plaza would be installed. Due to the maintenance requirements of maintaining a field of wheat at the site, this alternative was dismissed from further consideration.



Figure 2-13: Tear Drops on a Wheat Field design

2.8 ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The NPS is required to identify the environmentally preferable alternative in its NEPA documents for public review and comment. The NPS, in accordance with the Department of the Interior policies contained in the Departmental Manual (516 DM 4.10) and the council on Environmental Quality's *NEPA'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)(516 DM 4.10). 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 or 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 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 2-1. The full analysis for each impact topic is found in Section 4.

Table 2-1 : Summary of Impacts to Resources by Alternative

Impact Topic	No Action Alternative	Alternative 1	Alternative 2
Cultural Resources: Historic Resources	The Memorial would not be constructed. Therefore, there would be negligible impacts on historic resources.	Alternative 1 would alter L'Enfant view corridors, which would result in long-term minor adverse impacts. Changes to views of the site would result in long-term minor adverse impacts on the Gales School, the Old Post Office, and the former Childs Restaurant and negligible impacts on Union Station and Plaza and Columbus Circle. There would be short-term minor adverse impacts on the L'Enfant Plan, Gales School, Old City Post Office, Union Station and Plaza, Columbus Fountain, and the former Childs Restaurant building as a result of construction at the site. Cumulative impacts on the L'Enfant Plan and Union Station and Plaza would be minor, while those on Columbus Fountain	Alternative 2 would alter L'Enfant view corridors, which would result in long-term minor adverse impacts. Changes to views of the site would result in long-term minor adverse impacts on the Gales School, the Old Post Office, and the former Childs Restaurant and negligible impacts on Union Station and Plaza and Columbus Circle. There would be short-term minor adverse impacts on the L'Enfant Plan, Gales School, Old City Post Office, Union Station and Plaza, Columbus Fountain, and the former Childs Restaurant building as a result of construction at the site. Cumulative impacts on the L'Enfant Plan and Union Station and Plaza would be minor, while those on Columbus Fountain

Impact Topic	No Action Alternative	Alternative 1	Alternative 2
		would be beneficial.	would be beneficial.
Visitor Use and Experience	The existing site would continue to be used for passive recreation. Therefore, there would be no impacts.	Alternative 1 would augment the existing open space to provide education opportunities and visitor amenities, resulting in beneficial impacts. The experience of pedestrians approaching from Massachusetts Avenue would be of an open area, while the pedestrian experience along F Street would appear more restricted, resulting in minor adverse impacts on those pedestrians. Short-term moderate adverse impacts would occur during construction. Cumulatively, Alternative 1 would have short-term moderate adverse impacts and overall long-term beneficial impacts.	Alternative 2 would augment the existing open space to provide education opportunities and visitor amenities, resulting in beneficial impacts. The experience of pedestrians approaching from Massachusetts Avenue and F Street would be of an open area with trees, although minor adverse impacts would occur to potential cover to illegal activity given by the ten-foot tall sculpture. Short-term moderate adverse impacts would occur due during construction. Cumulatively, Alternative 2 would have short-term moderate adverse impacts and overall long-term beneficial impacts.

This page intentionally left blank

3.0 AFFECTED ENVIRONMENT

This page is intentionally left blank

3.1 CULTURAL RESOURCES

This section documents the cultural resources located on the project site and within the surrounding area. This information was derived from NRHP nominations, historic maps, and field surveys. For the purposes of this document, the cultural resources impact topic considered is historic (above-ground) properties, including historic structures and districts, and memorials. Archeological resources, cultural landscapes, ethnographic resources, and museum collections were dismissed as impact topics.

The National Historic Preservation Act (NHPA) of 1966 is the guiding legislation for the preservation of historic properties. As broadly defined by 36 CFR 800, historic properties are “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the National Register of Historic Places.” According to the NHPA, properties that qualify for inclusion in the NHRP must meet at least one of the following criteria:

- Criterion A: Be associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: Be associated with the lives of persons of significance in our past;

Criterion C: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

Criterion D: Have yielded, or may be likely to yield, information important in prehistory or history (36 CFR 60.4).

Properties that qualify for the NRHP must also possess integrity, which is defined as the ability of a property to convey its significance. The seven aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. The term “eligible for inclusion in the NRHP” describes properties formally designated as eligible and all other properties determined to meet NRHP Criteria.

In accordance with Section 106 of the NHPA, federal agencies are required to consider the effects of a proposed project on properties listed in, or eligible for listing in, the NRHP. NPS has entered into consultation with SHPO and other interested agencies and individuals to identify historic properties that could be affected, to assess potential adverse effects, and to resolve the adverse effects through mutually agreed upon avoidance, minimization, or mitigation measures.

An initial step in the Section 106 process is the determination of the area within which historic properties would be affected or are likely to be affected. The area of potential effects (APE) as defined by 36 CFR 800.16(d) 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. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” For the development of the preferred Memorial design (the current undertaking), NPS initiated consultation with the DC SHPO in 2008.

For the Memorial design, the Primary APE for above-ground historic resources is the project site. A broader secondary APE was defined that represents the area within which the proposed Memorial has the potential to have both direct effects and indirect visual effects on historic properties.

Both the primary and secondary APEs for historic above-ground resources are identified in Figure 3-1. Historic properties that lie within this area are listed in Table 3-1 and located in Figure 3-1. Note that this list includes properties listed in the National Register, properties determined eligible, and properties that may be eligible but have not yet been evaluated.

Table 3-1: Historic Properties within the Area of Potential Effects

HISTORIC STRUCTURES AND DISTRICTS
L’Enfant Plan of the City of Washington
Gales School
City Post Office (Postal Museum)
Union Station
Columbus Fountain
Old Engine Company Number 3
OTHER PROPERTIES
Victims of Communism Memorial
Former Childs Restaurant (now SunTrust Bank)

Source: AECOM, 2011

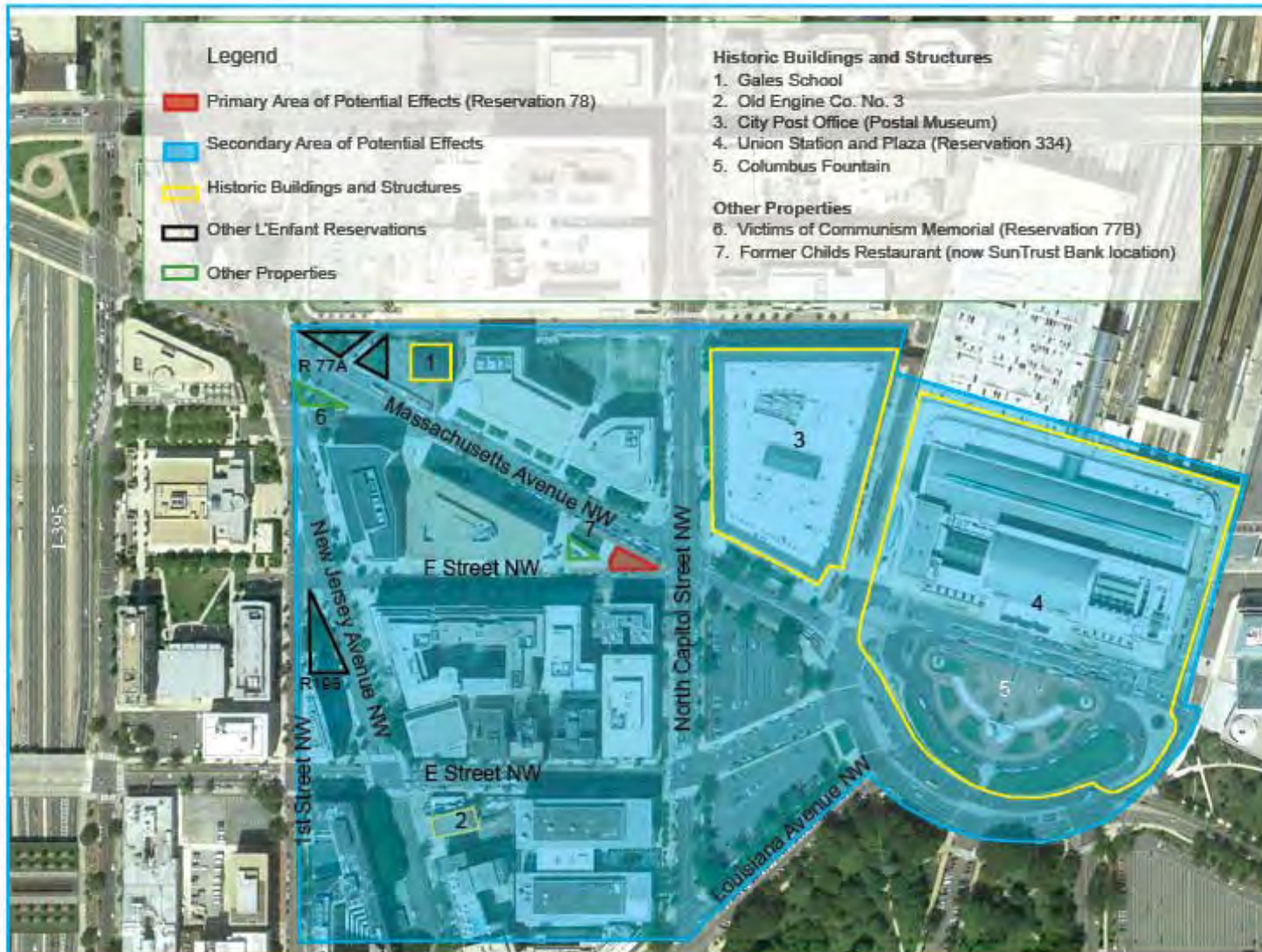


Figure 3-1: Area of Potential Effects (APE)

Source: AECOM, 2011

3.1.1 Historic Resources

This section documents historic resources, including historic structures, historic districts, and memorials. Although not all memorials within the Area of Potential Effect (APE) have been listed on the National Register either individually or as contributing resources to historic districts, they are treated similarly by the NPS.

L'Enfant Plan of the City of Washington

The project site is located immediately to the southwest of streets originally planned by Pierre Charles L'Enfant in the 18th century. L'Enfant's 1791 Plan for Washington (Figure 3-2), widely considered one of the best American examples of a comprehensive Baroque city plan, defined the physical and symbolic character of the nation's capital through its arrangement of buildings, parks, roadways, and views. North Capitol and F Streets and Massachusetts Avenue were all part of L'Enfant's original street layout. Massachusetts Avenue was planned as a 160-foot wide diagonal thoroughfare between Lincoln Park and northwest Washington. North Capitol and F Streets, which define the eastern and southern boundaries of the Memorial site, were part of L'Enfant's orthogonal street grid. They historically had 130-foot and 70-foot rights-of-way, respectively.

At the turn of the century, the McMillan Commission expanded on L'Enfant's Plan in a manner consistent with the City Beautiful movement, extending the National Mall to the west and terminating several visual axes with monuments (Figure 3-3). The McMillan Plan envisioned Union Station as a grand gateway with radiating roadways. The implementation of the McMillan Plan altered the street pattern in the vicinity of the Memorial site.



Figure 3-2: L'Enfant Plan, 1887

Source: *Library of Congress, Geography and Maps Division*

The L'Enfant Plan is listed in the NRHP. A draft National Historic Landmark nomination was also prepared in 2002. The nomination recognizes components of the McMillan Plan that contribute to the L'Enfant Plan.

As outlined in the National Register nomination, the streets that border the site are contributing elements to the plan. Massachusetts Avenue is a recognized Avenue in the Plan. The nomination also identifies North Capitol Street as a Major Street and F Street as a contributing East-West Street.

In addition, both Massachusetts Avenue and North Capitol Street are also contributing vistas to the L'Enfant Plan. Massachusetts Avenue affords views to the east of the U.S. Post Office Museum, Columbus Circle, and the front façade of Union Station. Views along

the corridor are generally framed by street trees and tall commercial structures. Views are also afforded along North Capitol Street, but are more tightly framed due to the narrower street and sidewalks.

The primary APE is a L'Enfant Reservation, and others lie within the secondary APE. The Memorial site is Reservation 78, which, due to its association with the diagonal Massachusetts Avenue, is considered a contributing element of the L'Enfant Plan. Like the project site, Reservation 77B, now the site of the Victims of Communism Memorial, and Reservation 77A are a result of the Diagonal Massachusetts Avenue. Reservation 196 is located at New Jersey Avenue and 1st Street NW. These reservations are also considered contributing elements to the L'Enfant Plan.

Reservation 334 (Columbus Plaza), is a semi-circular parcel that serves as the forecourt to Union Station from which radiate Louisiana, Delaware, and Massachusetts Avenues and E and First Streets. The plaza is identified in the McMillan Plan.

According to the National Register nomination, the L'Enfant Plan meets National Register Criterion A for its relationship with the creation of the new United States of America and the creation of a capital city. It also meets Criterion B because of its association with Pierre Charles L'Enfant and subsequent groups responsible for the planning and design of the city, and Criterion C as a representative example of a Baroque Plan with Beaux Arts modifications.

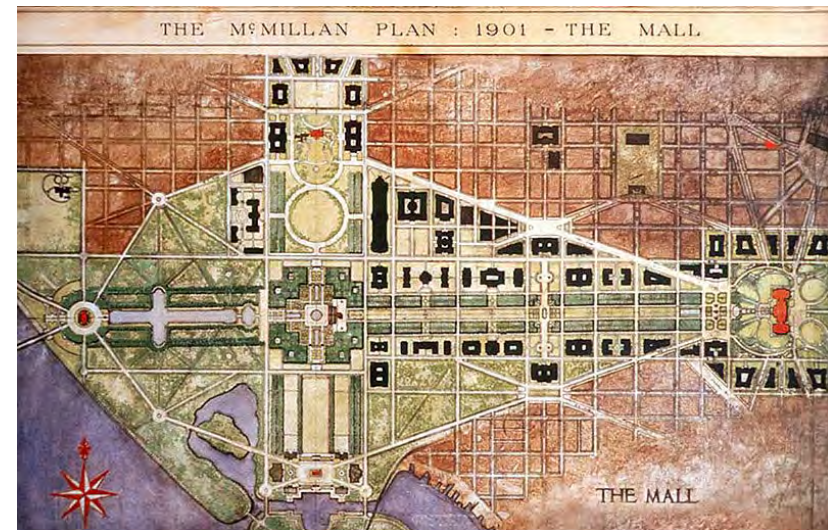


Figure 3-3: McMillan Plan

Source: NCPC

Gales School

The Gales School (Figure 3-4) is located at 65 Massachusetts Avenue. This twelve-room schoolhouse was constructed in 1881 as a school for special-needs children. It was designed by the Architect of the Capitol, Edward Clark, at the direction of the U.S. Congress. The structure served its original function until 1944. Since that time, it has served as temporary housing for soldiers returning from World War II, the offices of the Rent Control Board, and as a shelter for the homeless. It is also one of a few buildings surviving from Swampoodle, a blue collar neighborhood dominated by Italian and Irish immigrants that thrived at the end of the 19th century. The structure was listed in the DC Inventory in 2002 and is significant as a late 19th-century prototype for local schools.



Figure 3-4: Gales School
Source: AECOM, 2011

Old Engine Company Number 3

Located at 439 New Jersey Avenue, the Old Engine Company Number 3 (Figure 3-5) was constructed in 1916. The unit that occupies the building was organized in 1806 as the Columbia Volunteer Fire Company but is now termed the Columbia Hose Company. It is considered to be the most prestigious firefighting unit within the city, as it is responsible for the protection of the U.S. Capitol. The Italian Renaissance Revival style building is elaborately detailed, exemplifying the grand civic designs executed by the Office of the Municipal Architect during this period. The Old Engine Company Number 3 was listed in the DC Inventory of Historic Sites in 1994.



Figure 3-5: Old Engine Company Number 3
Source: AECOM, 2011

Old City Post Office

The City Post Office (Figure 3-6) is located at 2 Massachusetts Avenue, within Square 678. Like Union Station to the northeast, the City Post Office was designed by Daniel Burnham as part of the implementation of the McMillan Plan for the city. It was constructed between 1911 and 1914. The new building replaced the Old Post Office at 11th Street and Pennsylvania Avenue. The building underwent a major renovation between 1929 and 1935, at which time it was expanded to the north to fill the entire city block. The City Post Office was listed in the DC Inventory in 1964 and determined eligible for the National Register in 1983.



Figure 3-6: City Post Office
Source: AECOM

Union Station and Plaza

Union Station, located at the intersection of Massachusetts, Louisiana, and Delaware Avenues, was constructed between 1903 and 1908. Union station is listed in the DC Inventory of Historic Sites and the National Register of Historic Places, and according to the National Register nomination, “this imperial station with its vast interior spaces was literally the cornerstone of the McMillan Commission’s efforts to revive L’Enfant’s original plan of the city, creating a monumental gateway to the nation’s capital. “ The plaza serves as the forecourt to the building. Union Station is listed in the DC Inventory of Historic Sites in 1964 and in the National Register of Historic Places in 1969.



3-7: Union Station
Source: AECOM

Columbus Fountain

In Union Station Plaza, Columbus Fountain (Figure 3-8) is the focal point of vehicular and pedestrian traffic exiting Union Station or approaching the terminal from First Street and Massachusetts, Delaware, and Louisiana Avenues. Located at the south-central portion of the plaza, the plan of the semi-circular double tier fountain mirrors the footprint of the plaza itself. The marble fountain was designed by Daniel Burnham and sculpted by Lorado Taft between 1908 and 1912. The Fountain was designed to symbolize the Old and New Worlds while Union Station represents the “mastery of the North American continent.” The Fountain is sited within a L’Enfant Plan reservation. It was listed in the DC Inventory of Historic Sites in 1964 and in the National Register of Historic Places in 1980.



Figure 3-8: Columbus Fountain

Source: AECOM, 2012

Former Childs Restaurant

At the western edge of the project site is the former Child's Restaurant building, which now houses a bank. The triangular building follows the building lines of Massachusetts Avenue and F Street, and its primary entry faces Union Station. Completed in 1926, the building was designed by William Van Alen, a New York architect responsible for the design of the Chrysler Building. The Child's Restaurant is the most visible of his work in Washington. The limestone-faced building is two stories high and is characterized by large Palladian windows on its two primary elevations and at its entry. Additional decorative elements include a carved cornice, pilasters, and fleur-de-lis motifs. The building was originally visible from Union Station, providing a direct visual link for visitors to Union Station in search of food service. In 1949, the building was the site of a three-hour sit in and rally to end segregation and discrimination. Due to its age and the prominence of its architect, the former Child's Restaurant Building may be eligible for listing in the National Register of Historic Places.



Figure 3-9: Former Childs Restaurant building

Source: AECOM, 2012

3.2 VISITOR USE AND EXPERIENCE

The existing site is experienced by visitors as open space. However, field observations indicate that the site is rarely used. Few visitor amenities are available, and no seating is provided at the site. The existing trees offer no shade for the grass panel of the site, although they do provide shade to pedestrians along Massachusetts Avenue and F Street.

Given the lack of visitor amenities, the site is primarily experienced as an open area by pedestrians. Pedestrians along all sides can look across the project site without impediment, providing an open pedestrian experience along F Street and Massachusetts Avenue adjacent to the site (see Figure 10 and Figure 11). The existing grass panel, which is separated from the surrounding sidewalks and bank entry by a rolled curb, is accessible on all sides.



Figure 10: View west along F Street from intersection with North Capitol Street

Source: AECOM, 2012



Figure 11: View east along F Street from mid-block
Source: AECOM, 2012

Among those using the site are visitors to Union Station, the National Postal Museum, and the U.S. Capitol. Approximately 70,000 people go through nearby Union Station each day, a number of whom pass by the site (Amtrak, 2010). The National Postal Museum received 325,900 visitors in 2011 (Smithsonian Institution, 2012). The U.S. Capitol received approximately 2.3 million visitors in 2010 (Architect of the Capitol, 2010). In addition, UCCA has hosted small gatherings at the site to commemorate events.

Overall, Washington, DC is a popular tourist destination within the United States, with approximately 15 million visitors each year (Destination DC 2011). The metropolitan area offers both public amenities and commercial attractions, which include federal buildings; monuments and memorials; museums, art galleries, and cultural institutions; education attractions; seasonal festivals and special events; sports and entertainment events; and others. The top attractions in Washington are museums and memorials (Destination DC 2011).

This page is intentionally left blank

4.0 ENVIRONMENTAL CONSEQUENCES

This page is intentionally left blank

4.1 GENERAL METHODOLOGY FOR ESTABLISHING IMPACT THRESHOLDS AND MEASURING EFFECTS BY RESOURCE

This Environmental Consequences chapter analyzes both beneficial and adverse impacts that would result from implementing the alternatives considered in this EA. This chapter also includes definitions of impact thresholds (e.g., negligible, minor, moderate, and major), methods used to analyze impacts, and the analysis used for determining cumulative impacts. As required by CEQ regulations implementing NEPA, a summary of the environmental consequences for each alternative, which can be found in Section 2: Alternatives, is provided in Table 2-1. The resource topics presented in this chapter, and the organization of the topics, correspond to the resource discussions contained in Section 3: Affected Environment of this EA.

General Methodology for Establishing Impact Thresholds and Measuring Effects by Resources

The following elements were used in the general approach for establishing impact thresholds and measuring the effects of the alternatives on each resource category:

- General analysis methods as described in guiding regulations, including the context and duration of environmental effects;
- Basic assumptions used to formulate the specific methods used in this analysis;
- Thresholds used to define the level of impact resulting from each alternative;

- Methods used to evaluate the cumulative impacts of each alternative in combination with unrelated factors or actions affecting park resources; and
- Methods and thresholds used to determine if impairment of specific resources would occur under any alternative.

4.1.1 General Analysis Methods

The analysis of impacts follows CEQ guidelines and Director's Order 12 procedures (NPS, 2001) and is based on the underlying goal of providing long-term protections, conservation, and restoration of native species and cultural landscapes. This analysis incorporates the best available scientific literature applicable to the region and setting, the species being evaluated, and the actions being considered in the alternatives.

As described in Section 1, NPS created an interdisciplinary science team to provide important input to the impact analysis. For each resource topic addressed in this chapter, the applicable analysis methods are discussed, including assumptions and impact intensity thresholds. Impacts described in this section are direct unless otherwise indicated.

4.1.2 Basic Assumptions

As stated above, the analysis of impacts follows CEQ guidelines and Director's Order 12 procedures (NPS, 2001) and incorporates the best available scientific literature applicable. However, applicable literature is not always available. In such cases, analysis may require assumptions of specific conditions. Assumptions used for

analysis in this EA are identified and explained for each resource, as needed.

4.1.3 Impact Thresholds

Determining the impact thresholds is a key component in applying NPS *Management Policies* and Director's Order 12. These thresholds provide the reader with an idea of the intensity of a given impact on a specific resource. The impact threshold is determined primarily by comparing the effect to a relevant standard based on applicable or relevant/appropriate regulations or guidance, scientific literature and research, or best professional judgment. Because definitions of intensity vary by impact topic, intensity definitions are provided separately for each impact topic analyzed in this document. Intensity definitions are provided throughout the analysis for negligible, minor, moderate, and major impacts. In all cases, the impact thresholds are defined for adverse impacts. Beneficial impacts are addressed qualitatively.

Potential impacts of the action alternatives are described in terms of type (beneficial or adverse); context; duration (short-or long-term); and intensity (negligible, minor, moderate, and major). Definitions of these descriptors include:

Beneficial: A positive change in the condition or appearance of the resource or a change that moves the resource toward a desired condition.

Adverse: A change that declines, degrades, and/or moves the resource away from a desired condition or detracts from its appearance or condition.

Context: The affected environment within which an impact would occur, such as local, park-wide, regional, global, affected interest, society as a whole, or any combination of these. Context is variable and depends on the circumstances involved with each impact topic. As such, the impact analysis determines the context, not vice versa.

Duration: The duration of the impact is described as short-term or long-term. Duration is variable with each impact topic; therefore, definitions related to each impact topic are provided in the specific impact analysis narrative.

Intensity: Because definitions of impact intensity (negligible, minor, moderate, and major) vary by impact topic, intensity definitions are provided separately for each impact topic analyzed.

4.1.4 Cumulative Impacts Analysis Method

The CEQ regulations to implement NEPA require the assessment of cumulative impacts in the decision-making process for federal actions. Cumulative impacts are 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). As stated in the CEQ handbook, “Considering Cumulative Effects” (1997), cumulative impacts need to be analyzed in terms of the specific resource, ecosystem, and human community being affected and should focus on effects that are truly meaningful. Cumulative impacts are considered for all alternatives, including the No Action Alternative.

Cumulative impacts were determined by combining the impacts of the alternative being considered with other past, present, and reasonably foreseeable future actions. Therefore, it was necessary to identify other ongoing or reasonably foreseeable future projects and plans at NAMA and, if applicable, the surrounding area. Table 4-1 summarizes these actions that could affect the various resources at the site, along with the plans and policies of both the park and surrounding jurisdictions, which were discussed in Section 2. Additional explanation for most of these actions is provided in the narrative following the table.

The analysis for cumulative impacts was accomplished using four steps:

Step 1: Identify Resources Affected. Fully identify resources affected by any of the alternatives. These include the resources addressed as impact topics in Sections 3 and 4 of this document.

Step 2: Set Boundaries. Identify an appropriate spatial and temporal boundary for each resource. The temporal boundaries are noted at the top of Table 4-1, and the spatial boundary for each resource topic is listed under each topic.

Step 3: Identify Cumulative Action Scenario. Determine which past, present, and reasonably foreseeable future actions to include with each resource. These are listed in Table 4-1 and described below.

Step 4: Cumulative Impact Analysis. Summarize the impacts of other actions, plus impacts of the proposed action to arrive at the total cumulative impact. This analysis is included for each resource in Section 4.

Table 4-1: Summary of Cumulative Projects

Impact Topic	Study Area	Present Actions	Future Actions
Cultural Resources: Historic Resources	APE	Union Station Master Plan	801 New Jersey Avenue Development, DC Streetcars, U.S. Capitol Master Plan, Union Station Master Plan
Visitor Use and Experience	Approximate two-block radius	Union Station Master Plan	U.S. Capitol Master Plan, Union Station Master Plan

Descriptions of Cumulative Projects

American Veterans Disabled for Life Memorial: The American Veterans Disabled for Life Memorial is planned for a two-acre landscaped parcel one block east and north of the Switzer Building. Bordered by 2nd Street, Washington Avenue, and ramps to I-395, the memorial will include a reflecting pool, treed walkways, and a landscaped area, all with commanding views of the U.S. Capitol Building.

Dwight D. Eisenhower Memorial: The Dwight D. Eisenhower Memorial will be established at a four-acre site bounded by Independence Avenue and 4th and 6th Streets, SW, and the Lyndon Baines Johnson Building. The project will establish a memorial, including the realignment and closure of Maryland Avenue to vehicular traffic, provide a visitor services facility, and transfer land from the U.S. General Services Administration and the District Department of Transportation to NPS.

Columbus Plaza Rehabilitation: NPS is in the process of rehabilitating Columbus Plaza, the forecourt to Union Station. The rehabilitation includes a reconfiguration of vehicular access in and around the plaza, including the roadways of Columbus Circle. The pedestrian refuges within the circle would be expanded. Pavement at the plaza would be replaced with turf and brick.

DC Streetcars: The District of Columbia Department of Transportation (DDOT) proposes to operate a streetcar system throughout Washington, DC. DDOT anticipates that the passenger service between along the H Street/Benning Road segment from Oklahoma Avenue to Union Station would begin in 2013. The western terminus of the segment would be on H Street, north of Union Station. Plans call for future extension of the service to

Washington Circle in northwest DC and the Benning Road Metro Station in northeast DC.

Jefferson Memorial Vehicular Security Barrier: NPS proposes the installation of permanent vehicle barriers and security monitoring at the Jefferson Memorial. This would replace the temporary concrete jersey barriers around the Memorial and the parking area that was closed to vehicular traffic in 2001 to provide security to the Memorial and to protect its visitors and staff.

Lincoln Memorial Reflecting Pool and Grounds Rehabilitation: This project would rehabilitate and enhance the infrastructure, circulation, and accessibility around the Lincoln Memorial east plaza. At the Reflecting Pool, upgrades to the structural and water systems would improve its functionality and sustainability and formalize walkways along the north and south edges of the pool. Site furnishings throughout the project area would be refurbished and reconfigured.

Mall Turf Rehabilitation: NPS seeks to improve the vegetation and soil on the Mall by removing and replacing the existing soil and irrigation system in portions of the Mall and installing new curb and gutter profiles around turf panels.

Master Plan for the U.S. Capitol: A new Master Plan for the U.S. Capitol is currently being prepared. It will address the U.S. Capitol and its grounds, the U.S. Botanical Garden, and the Library of Congress, all of which are under the administration of the Architect of the Capitol, as well as outline future locations for new buildings, parking, and open space.

National Mall Plan: The NPS's National Mall Plan lays out management policies and strategies to restore the National Mall. It

focuses on cultural resources, visitor circulation, natural resource protection, visitor amenities, health and public safety, and park operations.

Potomac Park Levee, Phases 1 and 2: This project would introduce an improved levee system in the area between 23rd Street and 17th Street and along the north side of the Reflecting Pool. At 17th Street, just south of Constitution Avenue, a closure structure would be built with abutments that support posts and panels that would be erected during a flood emergency. At 23rd Street and along the Reflecting Pool, existing low spots in the levee would be filled and brought to an elevation that complies with USACE standards.

President's Park South Improvements: Plans are currently under development for President's Park South, located south of the White House and managed by NPS. The designs will include landscape and infrastructure changes to the area that respond to the proposed street closures and re-design of security elements to preserve the iconic historic landscape that is the White House and its environs and an important destination for visitors.

Redesign of Union Square, Sylvan Theater Area, and Constitution Gardens: These projects building on the foundation of the National Mall Plan, which called for improvements to these spaces. NPS seeks to redesign Union Square as a symmetrical and formally laid out civic square that is flexible and suitable for multiple uses, including large First Amendment demonstrations and national celebrations, as well as general tourism. The redesign of the Sylvan Theater area would include a multi-purpose entertainment facility. For Constitution Gardens, the improvements would include upgrading the pedestrian circulation system, improving soils, reconstructing the lake to be self-sustaining, constructing a flexible

performance space, and adding a multi-purpose visitor facility that would coordinate with the Potomac Park levee and plans for the canal Lockkeeper's House, which may be relocated from 17th Street and Constitution Avenue.

Union Station Master Plan and Main Hall Alterations: The Union Station Redevelopment Corporation, which operates Union Station, was tasked by Congress in 2009 to create a comprehensive development plan for the complex. In its current draft form, the plan includes upgrades to interior and exterior spaces, an intercity bus facility, and future planned air rights development. The improvements to the Main Hall, as proposed in July, 2011, include floor openings to provide access to the lowest level, the removal of the central café, and the removal of existing planters.

Washington Monument Security Screening: NPS proposes to replace and improve the existing visitor screening facility at the base of the Washington Monument, replacing the existing temporary facility and improve the overall security of the Monument in a manner that maintains and preserves the visitor experience and cultural landscape of the Washington Monument Grounds.

801 New Jersey Avenue Development: Wal-Mart, in association with JBG Rosenfeld Retail, plans to build a mixed-use development with ground-floor at 801 New Jersey Avenue. The retail would include one of six initial Wal-Mart stores in DC. The store would be between 80,000 and 120,000 square feet.

I-395 Air Rights Development: The District Department of Transportation proposes to modify the access ramps connecting I-395 with 3rd and 2nd Streets, just south of Massachusetts Avenue. This action would also declare the air rights above the depressed portion of the interstate between Massachusetts Avenue, E Street,

and 3rd and 2nd Streets as excess, in addition to several adjacent parcels of land.

This page is intentionally left blank

4.2 CULTURAL RESOURCES

4.2.1 Historic Resources

Methodology and Assumptions

Historic resources located within the APE that are listed in, or potentially eligible for listing in, the NRHP were identified as part of this study through the Section 106 process. For each of the alternatives, a determination was made regarding possible adverse effects under Section 106 and these determinations correlate to the NEPA impacts as indicated in the impact thresholds below.

A range of sources were used in analyzing the impacts to these resources, including National Register nominations, historic maps, and field surveys.

Study Area

The study area for historic resources is the Secondary APE, as delineated in Figure 3-1. The area is bounded by G Street to the north, 1st Street to the west, Union Station to the northeast, and Louisiana Avenue to the southeast.

Impact Thresholds

The impact thresholds for historic resources are described in the following categories:

- *Negligible.* The impact does not result in any noticeable changes to the resource or its visual context. For the purposes of Section 106, a determination of negligible impact would be considered *no adverse effect*.
- *Minor.* A minor adverse impact occurs when there are noticeable changes to the resource or its context, but these changes do not affect the resource's character-defining features or integrity. For the purposes of Section 106, a determination of minor impact would be considered *no adverse effect*.
- *Moderate.* A moderate adverse impact results in a change to one or more of the resource's character-defining features, but would not diminish the integrity of the resource to the extent that its NRHP eligibility would be lost. For the purposes of Section 106, a moderate impact would be an *adverse effect*.
- *Major.* A major adverse impact results in substantial and highly noticeable changes to character-defining features such that the integrity of the resource would be compromised to the extent that it may no longer be eligible for listing in the National Register. For the purposes of Section 106, a major impact would be an *adverse effect*.
- *Beneficial:* A beneficial impact would improve or increase character-defining features or would reduce features that

impede character-defining features. For purposes of Section 106, the determination of effect would be *no adverse effect*.

- *Duration:* Short-term impacts would occur and last through the construction period. Long-term impacts would extend beyond the construction period.

Historic Resources Impacts of No Action Alternative

Under the No Action Alternative, no changes would be made to the project site. The existing trees and open space would remain. There would be no change to historic resources located within the APE, including elements of the L'Enfant Plan, the Gales School, Old Engine Company Number 3, Old City Post Office, Union Station and Plaza, Columbus Fountain, and the Former Childs Restaurant. As a result, there would be no impacts on historic resources and no adverse effect under Section 106.

Cumulative Impacts

Because there would be no impacts on historic resources under the No Action Alternative, there would be no cumulative impacts.

Conclusion

Under the No Action Alternative, no changes would be made to the project site. Historic resources located within the APE, including elements of the L'Enfant Plan, the Gales School, Old Engine Company Number 3, Old City Post Office, Union Station and Plaza, Columbus Fountain, and the Former Childs Restaurant, would remain unchanged. Thus, there would be no impacts on historic resources under the No Action Alternative and no adverse effect under Section 106.

Historic Resources Impacts of Alternative 1

L'Enfant Plan of the City of Washington

Under Alternative 1, the Memorial would be sited on Reservation 78. The Memorial would include a linear sculpture parallel with F Street. A plaza would be installed at the site. Landscaping featuring a row of trees would be installed along F Street. Access to the site would be from Massachusetts Avenue, F Street, and the former Childs Restaurant entry sidewalk. Alternative 1 would relocate the sidewalk along Massachusetts Avenue the edge of the project site. Due to the sculpture's relatively low profile (7.5 feet in total) and the continued park setting, the use of the site as park open space would continue. The placement of trees would minimize impacts to views across Reservation 78, whose open character is a defining feature.

The vista along Massachusetts Avenue would be reinforced by the installation of additional street trees adjacent to the site, consistent with the District's streetscape guidelines. The entry points to the plaza would be visible, but would be low in profile. Due to the siting of the sculpture and landscape trees away along F Street, these elements would be minimally visible along the periphery of the F Street view corridor and would not block views within the Massachusetts Avenue corridor.

No changes would be made to North Capitol Street or F Street, contributing roadways that border the project site. Looking along North Capitol Street, the vista would be little altered due to the location of the plaza and sculptural wall. The apex of the vegetated area of the project site at North Capitol would remain as a low landscape area and the plaza entrance would not access the North Capitol Street sidewalk. The sculpture would be set back almost 95

feet from the roadway, limiting its visibility. The landscape trees would be set back approximately 80 feet from the North Capitol Street roadway, putting them at the periphery of the North Capitol Street view corridor, along with the F Street entrance to the plaza. The Memorial would not block views within the North Capitol corridor.

Due to the distance from the site, trees, vehicles, and other visual impediments, the Memorial site is minimally visible from Reservation 334, which serves as the location of Columbus Plaza (also called Union Station Plaza). Due to the scale of the Memorial elements, views from Columbus Plaza to the Memorial site would be minimally altered.

Overall, long-term impacts on the L'Enfant Plan would be adverse and minor. The site would continue as a park open space. Due to the placement and scale of the Memorial features, changes to view corridors would be limited. The Memorial elements would not block view corridors, and would not alter their overall character, maintaining their defining features. There would be no adverse effect under Section 106.

Gales School

Due to its location along Massachusetts Avenue, the Memorial would be visible from the Gales School. However, due to the approximately six-foot height of the linear sculpture and base and to the placement along F Street, these elements would be minimally visible. The landscape trees of the Memorial would also be visible from the Gales School, but would not alter the setting of the school. Therefore, there would be long-term negligible impacts on the Gales School and no direct impacts as a result. There would be no adverse effect under Section 106.

Old Engine Company Number 3

The Memorial would not be visible from Old Engine Company Number 3. Therefore there would be no impact on this resource and no adverse effect under Section 106.

Old City Post Office

The Old City Post Office lies diagonally across North Capitol Street from the Memorial site. The introduction of a linear sculpture, plaza, and landscaping would be visible from the Old City Post Office. However, due to the placement of the sculpture and landscape trees along F Street and away from Massachusetts Avenue, and the low profile of the plaza, alterations to this view would be minimal. New and existing street trees would further filter the view. These changes to views of the project site would little change the setting of Old City Post Office. There would be no direct impact on this resource and long-term minor adverse indirect impacts due to the visible changes to the project site and setting. There would be no adverse effect under Section 106.

Union Station and Plaza

Union Station lies approximately one block southeast from the site along Massachusetts Avenue. Views to the Memorial site from Union Station are partially obstructed due to existing street trees along Columbus Circle and Massachusetts Avenue. The placement of the linear sculpture and landscape trees along F Street would alter the view to the Memorial site, but impacts would be minimal due to the low scale and new and existing street trees. From Union Station, views of the plaza's ground-level plane would be filtered through trees, but would not affect the overall setting of Union Station. As a result, there would be negligible long-term indirect

impacts and no direct impacts on Union Station. There would be no adverse effect under Section 106.

Columbus Fountain

From Columbus Fountain, which lies in the middle of Columbus Plaza, views to the Memorial site are partially obstructed by existing street trees. Like Union Station and Plaza, the placement of the linear sculpture and landscape trees would alter the view to the site, but impacts would be minimal due to the elements' scale and the existing trees. Views of the plaza would be similarly filtered through trees. Overall, changes to views of the project site would not alter the overall setting of the Columbus Fountain. As a result, there would be negligible long-term indirect impacts and no direct impacts on Columbus Fountain. There would be no adverse effect under Section 106.

Former Childs Restaurant Building

The former Childs Restaurant building lies directly to the west of the Memorial site, separated by a wide concrete sidewalk/entry area. Alternative 1 would maintain the open space in front of the building. Views of the building's entrance, located at the apex of the angular building and a central design feature, would vary. From Massachusetts Avenue adjacent to the site, views would be open and unimpeded, while views from points along F Street adjacent to the linear sculpture would be limited by the sculpture and landscape trees. Landscape trees would also filter views from the southeast to the entrance. In order to minimize this impact, trees would be arranged in a spacing that allows for such views. Therefore, there would be long-term minor adverse indirect impacts on the former Childs Restaurant building and no direct impacts. There would be no adverse effect under Section 106.

Short-term Impacts

Construction activities, as well as the associated location of trailers and materials at the project site, would be visible from historic resources in the vicinity but would not intrude on the L'Enfant and McMillan Plan vistas under Alternative 1. The open space character of the site would be temporarily altered. Therefore, there would be short-term minor adverse impacts on the L'Enfant Plan, Gales School, Old City Post Office, Union Station and Plaza, Columbus Fountain, and the former Childs Restaurant building.

Cumulative Impacts

The Columbus Plaza Rehabilitation, Union Station Master Plan, 801 New Jersey Avenue Development, and the implementation of DC streetcar program could have cumulative impacts.

The Columbus Plaza Rehabilitation would impact the plaza itself, as well as the Columbus Fountain. The rehabilitation will restore walkways, upgrade sub-surface mechanical system, and expanded buffer area. These changes would result in beneficial impacts on the plaza. The rehabilitation would also remove the interior circular roadway, thus removing potential disturbances to the fountain.

The mixed-use, multi-story development of 801 New Jersey Avenue would be located along a L'Enfant avenue. This project could result in long-term moderate adverse impacts on historic resources due to possible changes to the New Jersey Avenue and other L'Enfant view corridors.

The implementation of DC's streetcar program would include a streetcar line that would run along H Street to the north of Union Station. The short-term western terminus of the line is planned to

be the bridge across the railroad tracks, known as the Hopscotch Bridge. Long-term plans for the line would extend it westward to Washington Circle. These changes have the potential to impact the L'Enfant Plan due to the disturbance of L'Enfant roadways and view corridors. Additionally, an interim connection to Union Station is planned, although specific designs have not yet been finalized. Such changes could result in adverse impacts on Union Station.

The Union Station Master Plan outlines numerous improvements for the historic facility. The current design for the Main Hall improvements would result in moderate adverse impacts on Union Station, based on the identification of "minor adverse effects" through the Section 106 process (Federal Railroad Administration, 2011). (Note: A different nomenclature is used in this EA than in the Section 106 Effects Report. As a result, the finding of "minor adverse effects" is considered equivalent to moderate adverse impacts.) Some of the measures identified in the master plan are completed or are currently underway, while others, such as the creation of a new station entrance from H Street and the construction of an intercity bus terminal, are in the planning stages. These projects could also result in adverse impacts on Union Station.

As described above, Alternative 1 would result in long-term overall minor adverse impacts on the L'Enfant Plan due to changes in view corridors along adjacent streets. As a result in changes of view from historic resources, Alternative 1 would result in long negligible impacts on Union Station and Plaza and Columbus Fountain.

When combined with cumulative projects, Alternative 1 could result in minor adverse impacts on the L'Enfant Plan as a result of changes in view corridors. Union Station and Plaza could experience minor

long-term adverse cumulative impacts, while Columbus Fountain would experience beneficial cumulative impacts.

Conclusion

Alternative 1 would alter L'Enfant view corridors adjacent to the site, but due to the scale and placement of Memorial elements, the long-term adverse impacts on the L'Enfant Plan would be minor. Changes to views of the site would result in long-term minor adverse impacts on the Old Post Office and negligible impacts on the Gales School, Union Station, and Plaza and Columbus Circle. The former Childs Restaurant would experience minor adverse impacts due to changes in views to and from the building. There would be short-term minor adverse impacts on the L'Enfant Plan, Gales School, Old City Post Office, Union Station and Plaza, Columbus Fountain, and the former Childs Restaurant building as a result of construction at the site. There would be no adverse effect under Section 106. Cumulative impacts on the L'Enfant Plan and Union Station and Plaza would be minor, while those on Columbus Fountain would be beneficial.

Historic Resources Impacts of Alternative 2

L'Enfant Plan of the City of Washington

Like Alternative 1, under Alternative 2, the Memorial would be sited on Reservation 78. The Memorial would include central sculpture approximately ten feet in height. A plaza would be installed at the site. Landscaping featuring large shade trees would be installed at the eastern and western sides. As a result of the relatively low profile of Memorial elements and the continued park setting, the use of the site as park open space would continue.

Under Alternative 2, the Massachusetts Avenue sidewalk abutting the site would extend to right-of-way called for in the 1791 L'Enfant Plan. Like Alternative 1, the street trees would reinforce the Massachusetts Avenue view corridor and the plaza would be minimally visible under Alternative 2. The installation of landscape trees would be visible but would not detract from the overall wide, tree-line character of the Massachusetts Avenue view corridor, and the Memorial elements would not block existing views, a character-defining feature.

No changes would be made to North Capitol Street or F Street, contributing roadways that border the project site. Looking along North Capitol Street, the vista would be little altered due to the location of the plaza and sculptural wall. Similar to Alternative 1, the project site's apex of vegetated area at North Capitol would remain as a low landscape area and the plaza entrance would not access the North Capitol Street sidewalk under Alternative 2. The landscape trees would be located approximately 60 feet from the North Capitol roadway, thereby no impeding on the building lines. The sculpture would be set back almost 100 feet from the roadway,

limiting its visibility. The Memorial would not block views within the North Capitol corridor.

Like Alternative 1, under Alternative 2 the Memorial site is minimally visible from Reservation 334. The distance from the site, trees, light posts, and other visual impediments limit visibility. Due to the scale of the Memorial elements, views from Columbus Plaza to the Memorial site would be minimally altered.

Overall, impacts on the L'Enfant Plan would be minor. The site would continue as a park open space. Due to the placement and scale of the Memorial features, changes to view corridors would be limited. The Memorial elements would not block view corridors, and would not alter their overall character, maintaining their defining features. There would be no adverse effect under Section 106.

Gales School

Due to its location along Massachusetts Avenue, the Memorial would be visible from the Gales School. The approximately ten-foot sculpture and landscape trees would be minimally visible, but would not alter the overall character of the school's setting. Therefore, there would be negligible impacts on the Gales School as a result. There would be no adverse effect under Section 106.

Old Engine Company Number 3

The Memorial would not be visible from Old Engine Company Number 3. Therefore there would be no impact on this resource and no adverse effect under Section 106.

Old City Post Office

The Old City Post Office lies diagonally across North Capitol Street from the Memorial site. The introduction of a central sculpture, plaza, and landscaping would be visible from the site, although the view would be of open space. The landscape trees would be visible from the Old City Post Office, but would filter the view of the sculptural element and the plaza. New and existing street trees would further filter the view. However, these changes would minimally alter the overall setting of the Old Post Office. There would be no direct impact on this resource and long-term minor adverse indirect impacts due to the visible changes to the site. There would be no adverse effect under Section 106.

Union Station and Plaza

Union Station lies approximately one block southeast from the site along Massachusetts Avenue. Views to the Memorial site are partially obstructed due to existing street trees along Columbus Circle and Massachusetts Avenue. The landscape trees would be visible from Union Station Plaza, but views of the sculpture would be minimal. Overall, changes to views of the project site would not alter the overall setting of Union Station. As a result, there would be negligible long-term indirect impacts and no direct impacts on Union Station. There would be no adverse effect under Section 106.

Columbus Fountain

From Columbus Fountain, which lies at the western edge of Columbus Plaza, views to the memorial site are partially obstructed by existing street trees. Like Union station and Plaza, landscape trees would alter the view from Columbus Fountain to the project site, but impacts would be minimal due to the existing trees.

Overall, changes to views of the project site would not alter the overall setting of the Columbus Fountain. As a result, there would be negligible long-term indirect impacts and no direct impacts on Columbus Fountain. There would be no adverse effect under Section 106.

Former Childs Restaurant Building

The former Childs Restaurant building lies directly to the west of the Memorial site, separated by a wide concrete sidewalk/entry area. Views of the building's entrance are open and unimpeded. Alternative 2 would maintain the open space in front of the building because the sculpture would not be placed east (in front) of the building, but rather just north of the Childs Restaurant building's line. Therefore, the sculpture would not block views of the building's entry. Landscape trees would be placed along the western portion of the project site approximately 30 feet from the building entrance and near the apex of the project site. These trees would minimize views to the building entrance, blocking views of the entrance from southeast of the site, including Union Station, due to tree placement and topography. This would alter the historic visual link between Union Station and the building. Potential mitigation measures would include spacing the landscape trees in a way that offers views of the Childs Restaurant Building, as well as choosing landscape tree species that allow filtered views through the foliage. Therefore, there would be long-term minor adverse indirect impacts on the former Childs Restaurant building and no direct impacts. This would constitute no adverse effect under Section 106.

Short-term Impacts

Similar to Alternative 1, construction activities, as well as the associated location of trailers and materials at the project site, would be visible from historic resources in the vicinity but would not intrude on the L'Enfant and McMillan Plan vistas under Alternative 2. The open space character of the site would be temporarily altered. Therefore, there would be short-term minor adverse impacts on the L'Enfant Plan, Gales School, Old City Post Office, Union Station and Plaza, Columbus Fountain, and former Childs Restaurant building.

Cumulative Impacts

The cumulative projects for Alternative 2 would be the same as those discussed under Alternative 1. As described above, Alternative 2 would result in long-term overall minor adverse impacts on the L'Enfant Plan due to changes in view corridors along adjacent streets. As a result in changes of view from historic resources, Alternative 2 would result in negligible impacts on Union Station and Plaza and Columbus Fountain.

When combined with cumulative projects, Alternative 2 could result in minor adverse impacts on the L'Enfant Plan as a result of changes in view corridors. Union Station and Plaza could experience minor long-term adverse cumulative impacts, while Columbus Fountain would experience beneficial cumulative impacts.

Conclusion

As described above, Alternative 2 would alter L'Enfant view corridors adjacent to the site, but due to the scale and placement of Memorial elements, the long-term adverse impacts on the L'Enfant

Plan would be minor. Changes to views of the site would result in long-term minor adverse impacts on the Old Post Office and negligible impacts on the Gales School, Union Station and Plaza, and Columbus Circle. The former Childs Restaurant would experience minor adverse impacts due to changes in views to and from the building. This would constitute an adverse effect under Section 106.

There would be short-term minor adverse impacts on the L'Enfant Plan, Gales School, Old City Post Office, Union Station and Plaza, Columbus Fountain, and the former Childs Restaurant building as a result of construction at the site. Cumulative impacts on the L'Enfant Plan and Union Station and Plaza would be minor, while those on Columbus Fountain would be beneficial.

4.3 VISITOR USE AND EXPERIENCE

Methodology and Assumptions

This analysis considered the area's current uses and the potential effects of constructing an education facility on the visitor experience and use at the site. The Memorial could affect the activities and the type of visitor experience and use/visitation at the project site and the surrounding area. The visual character of the urban area experienced by the visitors was also considered.

The Ukrainian government and UCCA anticipate that the primary visitors to the Memorial would be passers-by who stop to view the Memorial. Occasional events, such as commemorations of anniversaries, would also occur at the site. The estimation of attendees is based upon previous events held by the Ukrainian government and UCCA at the Memorial site and other locations.

Study Area

The study area for visitor use and experience is the project site an approximately one-block radius that includes the National Postal Museum, Union Station, and the U.S. Capitol Grounds.

Impact Thresholds

The following thresholds were used to determine the magnitude of impacts on visitor use and experience:

- *Negligible:* Visitors would likely be unaware of any effects associated with implementation of the alternative. There would be no noticeable change in visitor use and experience

or in any defined indicators of visitor satisfaction or behavior.

- *Minor.* Changes in visitor use and/or experience would be slight and detectable but would not appreciably limit critical characteristics of the visitor experience. Visitor satisfaction would remain stable.
- *Moderate.* A few critical characteristics of the desired visitor experience would change and/or the number of participants engaging in a specified activity would be altered. Some visitors who desire their continued use and enjoyment of the activity/visitor experience might pursue their choices in other available local or regional areas. Visitor satisfaction would begin to decline.
- *Major.* Multiple critical characteristics of the desired visitor experience would change and/or the number of participants engaging in an activity would be greatly reduced or increased. Visitors who desire their continued use and enjoyment of the activity/visitor experience would be required to pursue their choices in other available local or regional areas. Visitor satisfaction would markedly decline.
- *Beneficial.* Characteristics of the desired visitor experience would improve and/or the number of participants engaging in an activity would increase. Visitor satisfaction would increase.

- *Duration.* Short term impacts would occur during the time of construction and the first year of operation. Long-term impacts would last beyond the first year of operation.

Visitor Use and Experience Impacts of No Action Alternative

The No Action Alternative would maintain the existing visitor uses and experience. The project site would continue to be used as open space. Visitors would continue to use the turfgrass panel as a potential location to rest, although no visitor facilities, including benches, would be at the site.

The visitor experience approaching the site would also be maintained. Approaching along Massachusetts Avenue and from F Street west of the site, visitors would continue to experience the site as an open area, with largely unobstructed views across the site. Access to the site would continue to be available from all adjacent sidewalks. Therefore, there would be no impacts on visitor use and experience as a result of the No Action Alternative.

Cumulative Impacts

Because there would be no impacts on visitor use and experience, there would be no cumulative impacts as a result of the No Action Alternative.

Conclusion

Under the No Action Alternative, the existing visitor use and experience would continue. The site would offer passive recreation opportunities. Access to the site from all surrounding sidewalks would continue. There would be no impacts on visitor use and experience.

Visitor Use and Experience Impacts of Alternative 1

Under Alternative 1, a Memorial to victims of the Ukrainian famine-genocide would be located at the project site, which is currently open space. The Memorial would include a linear sculpture and a paved plaza. In addition, the memorial would also include trees, landscaping, and an open landscape panel. Access to the Memorial would be from along Massachusetts Avenue, F Street, and the plaza area at the former Childs Restaurant building.

The Ukrainian government and UCCA anticipate that most visitors would visit the site as part of another trip to the vicinity. Union Station is a large transportation hub approximately one block from the site, while Massachusetts Avenue and North Capitol Street are busy east-west and north-south, respectively, corridors. The project sponsors expect that a small portion of passers-by along these routes would visit the Memorial. Additionally, it is anticipated that some visitors to the U.S. Capitol and the National Postal Museum would also incorporate a visit to the Memorial due to its proximity to these attractions. Occasional events would be held at the site, such as the commemoration of anniversaries, which would attract an estimated few hundred people.

Under Alternative 1, the Memorial would offer visitors the opportunity to learn about the manmade famine in Ukraine and to commemorate the victims in an open outdoor environment. Visitors would access the plaza from Massachusetts Avenue and from the paved plaza/sidewalk area in front the former Childs Restaurant building at the western side of the site. Visitors would view the sculpture from multiple points at the Memorial, including the plaza and bench. The Memorial would enhance the visitor experience by providing education opportunities and additional

visitor facilities, such as a plaza and seating. Additionally, a wayside exhibit would be placed on Massachusetts Avenue, providing additional learning opportunities. Therefore, there would be beneficial impacts on visitor use and experience.

Under Alternative 1, the landscaping of the Memorial would offer a more elaborate landscape than the existing grass panel. Along F Street, a row of landscape trees would provide a visual backdrop for viewing the Memorial. The trees would also shield views of business establishments on F Street that could potentially detract from the Memorial.

The pedestrian experience would vary for those using Massachusetts Avenue and F Street. For pedestrians approaching the site from Massachusetts Avenue, the turf panel and plaza would provide open views to the Memorial for passers-by and the missing street trees would be replaced. Due to the location of trees near the sidewalk and the linear nature of the sculpture, the pedestrian access to the site from F Street would be through specific points. From F Street, pedestrians would access the site through a paved connection to the plaza and via the former Childs Restaurant building, whose entry sidewalk connects to the Memorial. The street and landscape trees would also offer shade to pedestrians. Additionally, the experience of the pedestrian along F Street would be of a less open character, with trees lining both sides of the sidewalks (see Figure 4-1 and Figure 4-2). The linear sculpture, which would be located approximately ten feet from the sidewalk, would also add to a more enclosed environment. The linear sculpture would be approximately 7.5 feet tall, which would exceed the District of Columbia's 3.5-foot limit for landscape features (see Figure 2-6). As a result, long-term impacts on visitor use and experience would be adverse and minor.



Figure 4-1: View west along F Street, Alternative 1



Figure 4-2: View east along F Street, Alternative 1

The Memorial would not have handrails or barriers because the site would be relatively flat. Lighting would be from ambient sources, using existing streetlights and sidewalk lighting to illuminate the site after dark.

During construction of the Memorial, visitor use of the project site would be limited. Fencing would prohibit visitor entry and the sidewalks would potentially be closed, requiring re-routing of pedestrians. Signs would be placed on the sidewalks to inform pedestrians and cyclists of closures. Therefore, the short-term adverse impacts would be moderate.

Cumulative Impacts

Two master planning efforts in the vicinity have the potential to impact the cumulative visitor use and experience. The Union Station Master Plan outlines numerous projects to improve interior and exterior spaces, create an intercity bus facility, and plan the development of air rights. The renovation of the Main Hall would likely disrupt visitors to Union Station, as would the other renovation projects, during construction, resulting in moderate short-term adverse impacts. Once completed, these projects would facilitate the visitation of Union Station, and would therefore result in long-term beneficial impacts on visitor use and experience.

The new Master Plan will address the U.S. Capitol and its grounds, the U.S. Botanical Garden, and the Library of Congress, all of which are under the administration of the Architect of the Capitol, as well as outline future locations for new buildings, parking, and open space. Changes to the U.S. Capitol Grounds would likely result in moderate short-term impacts due to construction restricting the accessibility of some areas. Long-term, the changes would

minimally alter the overall visitor experience, resulting in negligible impacts on visitor use and experience.

As described above, Alternative 1 would result in overall long-term beneficial impacts and short-term moderate adverse impacts on visitor use and experience. When combined with the short-term adverse impacts and long-term beneficial impacts of the cumulative projects, the Alternative 1 would result in short-term moderate adverse cumulative impacts and long-term beneficial cumulative impacts on visitor use and experience.

Conclusion

Alternative 1 would offer visitors the opportunity to learn more about the famine-genocide that occurred in Ukraine through the use of the site as a memorial. Alternative 1 would augment the existing open space to provide education opportunities and small-scale visitor amenities, resulting in beneficial impacts. The experience of pedestrians approaching from Massachusetts Avenue would be of an open area, similar to current conditions. The experience of pedestrians along F Street would be of a more restricted character with landscape trees planted along the roadway, thereby resulting in minor adverse impacts on those pedestrians. Short-term moderate adverse impacts would occur due to limited site access and the re-routing of pedestrians and cyclists during construction. Combined with the cumulative projects, Alternative 1 would have short-term moderate adverse impacts and overall long-term beneficial impacts on visitor use and experience.

Visitor Use and Experience Impacts of Alternative 2

Under Alternative 2, a Memorial to victims of the Ukrainian famine-genocide at the project site would include a sculpture and a paved plaza. In addition, the memorial would also include trees and landscaping. Access to the Memorial would be from along Massachusetts Avenue and from F Street. Like Alternative 1, Alternative 2 would attract passers-by, visitors to the National Postal Museum, U.S. Capitol, and Union Station, and attendees of events hosted at the site. The same lighting would be provided under Alternative 2 as under Alternative 1.

Like Alternative 1, Alternative 2 would provide an educational experience in an open outdoor environment. Under Alternative 2, two vegetated areas separated by a plaza would replace the existing turf panel. The plaza would contain benches that provide seating to visitors, while landscape trees would offer some shelter from the sun. The circular plaza would have pedestrian access to Massachusetts Avenue and F Street, allowing. In addition, because the element is placed at the center of the plaza, the sculpture affords views from all points of the plaza. Visitors would also view the sculpture from multiple points along F Street and Massachusetts Avenue. A wayside located near the plaza entrance from Massachusetts Avenue would provide interpretation for visitors to the Memorial.

Unlike Alternative 1, the pedestrian experience would be similar for those using Massachusetts Avenue and F Street under Alternative 2. For pedestrians approaching the site from Massachusetts Avenue and F Street, the trees would provide slightly filtered views into the site (Figure 4-3 and Figure 4-4). Due to scale and relative locations

of the landscape trees, pedestrians would view the site as open space.

The trees would not notably alter the character of the pedestrian experience. Additionally, access to the Memorial would also be available at all points around the site. The plaza's formal access points would be along Massachusetts Avenue and F Street. Informal access to the site is available through the landscape areas. The central sculpture would be approximately ten feet tall (see Figure 2-10), which would exceed the District of Columbia's 3.5-foot limit for landscape features. As a result, long-term impacts on the pedestrian experience would be adverse and minor.

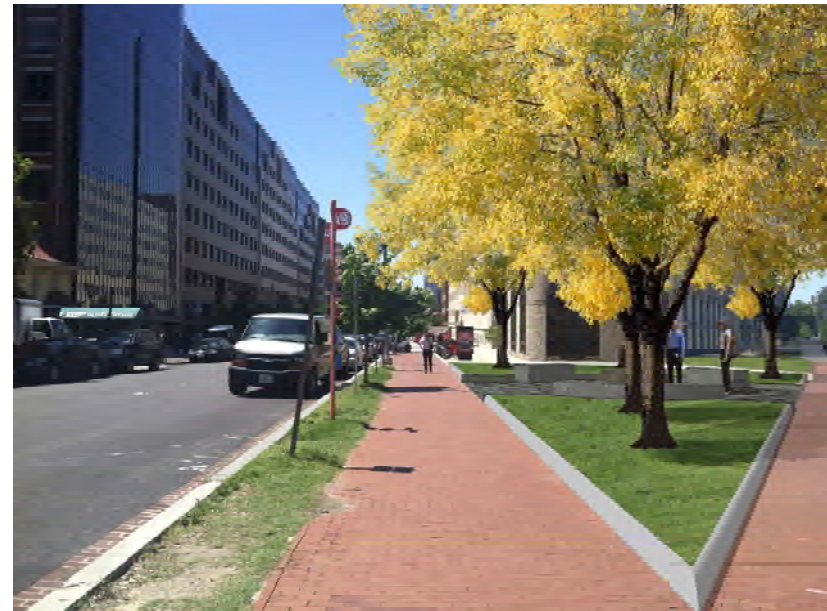


Figure 4-3: View west along F Street, Alternative 2



Figure 4-4: View east along F Street, Alternative 2

The trees would not notably alter the character of the pedestrian experience. Additionally, access to the Memorial would also be available at all points around the site. The plaza's formal access points would be along Massachusetts Avenue and F Street. Informal access to the site is available through the landscape areas. The central sculpture would be approximately ten feet tall, which would exceed the District of Columbia's 3.5-foot limit for landscape features. As a result, long-term impacts on the pedestrian experience would be adverse and minor.

During construction of the Memorial, visitor use of the project site would be limited. Fencing would prohibit visitor entry and the sidewalks would potentially be closed, requiring re-routing of

pedestrians. Signs would be placed on the sidewalks to inform pedestrians and cyclists of closures. Therefore, the short-term adverse impacts would be moderate.

Cumulative Impacts

The cumulative projects for Alternative 2 would be the same as those discussed under Alternative 1. As described above, Alternative 2 would result in overall long-term beneficial impacts and short-term moderate adverse impacts on visitor use and experience. When combined with the short-term adverse impacts and long-term beneficial impacts of the cumulative projects, the Alternative 1 would result in short-term moderate adverse cumulative impacts and long-term beneficial cumulative impacts on visitor use and experience.

Conclusion

Alternative 2, like Alternative 1, would augment the existing open space to provide education opportunities and small-scale visitor amenities, resulting in beneficial impacts. The experience of pedestrians approaching from Massachusetts Avenue and F Street would be of an open area with trees. Short-term moderate adverse impacts would occur due to limited site access and the re-routing of pedestrians during construction. Combined with the cumulative projects, Alternative 2 would have short-term moderate adverse impacts and overall long-term beneficial impacts on visitor use and experience.

5.0 CONSULTATION AND COORDINATION

This page is intentionally left blank

5.1 AGENCY CONSULTATION AND COORDINATION

Public agencies and individuals were involved in the development of this EA through the public scoping process and the Section 106 consultation process. NPS initiated the formal scoping process on November 23, 2011, when NPS distributed letters to cooperating agencies and stakeholders. In addition to mailing these notices, there were also notices included on NPS's Planning, Environment, and Public Comment (PEPC) website, which NPS uses to notify the public about NPS activities and actions. A public scoping meeting was held on December 9, 2011. The public comment period was closed on December 23, 2011. Comments received during this period were taken into consideration in the development of this EA.

In addition, meetings took place with stakeholders through the coordinated Section 106 and NEPA processes. NPS initiated the Section 106 process by sending a letter to the DC SHPO and to the Advisory Council on Historic Preservation on August 1, 2008, as part of the site selection process for the Memorial. The Section 106 process did not conclude with the site selection, but was rather continued through the design process.

NPS sent DC SHPO a letter identifying the area of potential effects and the resources within that area on November 25, 2011. Included in the letter were the design alternatives in order to consult on potential adverse effects on historic properties. After a review of the preferred design, DC SHPO responded in completion of a Section 106 review form dated February 6, 2012 that there would be no adverse effect, pursuant finalizing the design and further consultation.

In addition to the NEPA and Section 106 processes, the design team made several presentations to government bodies and agencies.

The design team presented concept plans to CFA on October 20, 2011, and to NCPC on December 1, 2011. CFA provided comments and approved the concept plan. Because NCPC does not approve concept plans, they provided comments. The design team also presented preliminary concepts to National Capital Memorials Advisory Commission for review (due to its advisory, rather than approval, capacity, NCMAC is not required to comply with NEPA). At these times, each body provided initial feedback and questions regarding the design concepts. These comments were considered as part of the design process.

The following federal and district agencies heard informational presentations of the two designs and provided initial feedback:

- NCPC;
- CFA;
- NCMAC;
- SHPO; and
- DC Office of Planning.

Before construction, these bodies will review the final concept. Some of the approvals from NPS, NCMAC, CFA, and NCPC will occur before the NEPA process is completed, while others will occur after the process.

This page is intentionally left blank

6.0 LIST OF PREPARERS

This page is intentionally left blank

6.1 LIST OF PREPARERS

AECOM (EA Preparers)

Alan Harwood, AICP

Project Director/Senior Environmental Planner

Claire Sale, AICP

Project Manager/Environmental Planner

Stephanie Dyer-Carroll, AICP

Cultural Resource Specialist

Christy Dolan, RPA

Cultural Resource Specialist

Heather Gibson, Ph.D., RPA

Cultural Resource Specialist

Brian Keightley

Environmental Planner

This page is intentionally left blank

7.0 GLOSSARY AND ACRONYMS

This page is intentionally left blank

7.1 GLOSSARY OF TERMS

Affected Environment — The existing environmental conditions to be affected by a proposed action and alternatives at the time the project is implemented.

Alignment — The arrangement or relationship of several disparate configuration components along a common vertical or horizontal line or edge.

Best Management Practices (BMP) — Methods that have been determined to be the most effective, practical means of preventing or reducing pollution or other adverse environmental impacts.

Contributing Resource — A building, site, structure, or object that adds to the historic significance of a property or district.

Council on Environmental Quality (CEQ) — Established by Congress within the Executive Office of the President with passage of the National Environmental Policy Act of 1969. CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives.

Cultural Resources — Archaeological, historic, or visual resources including prehistoric and historic districts, sites, buildings, objects, or any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or other reason.

Cumulative Impacts — Under NEPA regulations, the incremental environmental impact or effect of an action together with the effects of past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions.

Enabling Legislation — The law that gives appropriate officials the authority to implement or enforce regulations.

Endangered Species — Any species that is in danger of extinction throughout all or a significant portion of its range. The lead federal agency for the listing of a species as endangered is the U.S. Fish and Wildlife Service and it is responsible for reviewing the status of the species on a five-year basis.

Environmental Assessment (EA) — An environmental analysis prepared pursuant to the National Environmental Policy Act to determine whether a federal action would significantly affect the environment and thus require a more detailed environmental impact statement (EIS) or would not significantly affect the environment and thus conclude with a FONSI.

Environmental Impact Statement (EIS) — A report that documents the information required to evaluate the environmental impact of a project. It informs decision makers and the public of the reasonable alternatives that would avoid or minimize adverse impacts or enhance the quality of the environment.

Executive Order — Official proclamation issued by the president that may set forth policy or direction or establish specific duties in connection with the execution of federal laws and programs.

Finding of No Significant Impact (FONSI) — A document prepared by a federal agency showing why a proposed action would not have a significant impact on the environment and thus would not require preparation of an

Environmental Impact Statement (EIS). A FONSI is based on the results of an Environmental Assessment (EA).

Floodplain — The flat or nearly flat land along a river or stream or in a tidal area that is covered by water during a flood.

Mall — The area west of the United States Capitol between Madison and Jefferson Drives from 1st to 14th streets NW/SW. The east end of the Mall from 1st to 3rd streets NW/SW between Pennsylvania Avenue and Maryland Avenue is also known as Union Square. The Mall is characterized by the east-west stretch of lawn bordered by rows of American elm trees and framed by museums and other cultural facilities.

Monumental Core — The monumental core is the central area of federal Washington that includes the National Mall and the areas immediately beyond it, including the United States Capitol, the White House and President's Park, Pennsylvania Avenue and the Federal Triangle area, East and West Potomac Parks, the Southwest Federal Center, the Northwest Rectangle, Arlington Cemetery, and the Pentagon.

National Environmental Policy Act (NEPA) — The Act as amended, articulates the federal law that mandates protecting the quality of the human and natural environment. It requires federal agencies to systematically assess the environmental impacts of their proposed activities, programs, and projects including the "no build" alternative of not pursuing the proposed action. NEPA requires agencies to consider alternative ways of accomplishing their missions in ways that would be less damaging to the environment.

National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.) — The Act that established a program for the preservation of historic properties throughout the nation, and for other purposes.

National Mall — The area comprised of the Mall, the Washington Monument, and West Potomac Park. It is managed by the National Park Service's National Mall & Memorials Parks.

National Register of Historic Places (NRHP) — A register of districts, sites, buildings, structures, and objects important in American history, architecture, archeology, and culture, maintained by the secretary of the interior under authority of Section 2(b) of the Historic Sites Act of 1935 and Section 101(a)(1) of the National Historic Preservation Act of 1966, as amended.

Scoping — Scoping, as part of NEPA, requires soliciting public and agency comments on the proposed action and its possible effects; establishing the depth of environmental analysis needed; determining analysis procedures, data needs, and task assignments.

Threatened Species — Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Vista — A distant or long view, especially one seen through some opening such as an avenue or corridor, street wall, or the trees that frame an avenue or corridor; a site offering such a view.

Wetlands — The U.S. Army Corps of Engineers and the Environmental Protection Agency jointly define wetlands as “those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.” Wetlands generally include swamps, marshes, bogs, and similar areas.

7.2 ACRONYMS

ACHP	Advisory Council on Historic Preservation	NAMA	National Mall & Memorial Parks
APE	Area of Potential Effect	NCMAC	National Capital Memorial Advisory Commission
ADT	Average Daily Traffic	NCPC	National Capital Planning Commission
BGS	Below Ground Surface	NEPA	National Environmental Policy Act
CFR	Code of Federal Regulations	NMAAHC	National Museum of African American History and Culture
CFA	Committee of Fine Arts	NHPA	National Historic Preservation Act
CEQ	Council on Environmental Quality	NHRP	National Register of Historic Places
CWA	Commemorative Works Act	NAGPRA	Native American Graves Protection and Repatriation Act
DBH	Diameter at Breast-Height	NPS	National Park Service
DDOE	District Department of the Environment	PEPC	Planning, Environment, and Public Comment website
DCOP	District of Columbia Office of Planning	SHPO	State Historic Preservation Office
DDOT	District Department of Transportation	SOF	Statement of Findings
EA	Environmental Assessment	TCP	Traditional Cultural Property
EPA	Environmental Protection Agency	UCCA	Ukrainian Congress Committee of America, Inc.
FONSI	Finding of No Significant Impact	USFWS	United States Fish and Wildlife Service
FIRM	Flood Insurance Rate Map	WMATA	Washington Metropolitan Area Transit Authority
LOS	Level of Service		
MOA	Memorandum of Agreement		

8.0 REFERENCES

This page is intentionally left blank

8.1 REFERENCES

- Architect of the Capitol. 2010. *2010 Performance and Accountability Report*. Washington, DC.
- Amtrak. 2010. *Amtrak Fact Sheet, Fiscal Year 2010: District of Columbia*. Washington, DC.
- District of Columbia Geographic Information System (DC GIS). 2012. Accessed at <http://dcatlas.dcgis.dc.gov> on January 3, 2012.
- District of Columbia Office of Planning (DCOP). 2006. *Comprehensive Plan for the National Capital: District Elements*. Washington, DC.
- DC Preservation League. 1998. *Guidelines for Archaeological Investigations in the District of Columbia*. Accessed at <http://planning.dc.gov/DC/Planning/Historic+Preservation/Maps+and+Information/Policies+and+Procedures/Archaeology+Guidelines> on February 28, 2011.
- Federal Emergency Management Agency (FEMA). 2010 Flood Insurance Rate Map. Washington, DC, Community Panel Number 1100010019C); Effective date September, 2010.
- National Capital Planning Commission (NCPC). 1997. *Extending the Legacy: Planning America's Capital for the 21st Century*. Washington, DC.
- NCPC. 2001. *Memorials and Museums Master Plan*. Washington, DC.
- NCPC. 2004. *Comprehensive Plan for the National Capital: Federal Elements*. Washington, DC.
- NCPC. 2009. *Monumental Core Framework Plan: Connecting New Destinations with the National Mall*. Washington, DC.
- National Park Service (NPS). 2011. <http://www.nps.gov/nama/planyourvisit/directions.htm>, accessed November 22, 2011. Washington, DC.
- NPS. 2010. *National Mall Plan/ Environmental Impact Statement*. Washington, DC.
- NPS. 2009. National Center for Recreation and Conservation. <http://www.nps.gov/ncrc/programs/rtca/nri/>, accessed October 2011. Washington, DC.
- NPS. 2008. *Director's Order 24: NPS Museum Collections Management*. Washington, DC.
- NPS. 2006. *NPS Management Policies*. Washington, DC.
- NPS. 2006a. *Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision-making*. Washington, DC.
- NPS. 2006b. *Director's Order 12 Handbook*. Washington, DC.
- NPS. 1998. Director's Order 28: Cultural Resource Management. Accessed at http://cr.nps.gov/history/online_books/nps28 on January 5, 2012.
- NPS, Advisory Council on Historic Preservation, and National Council of State Historic Preservation Officers. 2008. *Programmatic Agreement among the National Park Service,*

Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers for Compliance with Section 106 of the NHPA. Washington, DC.

National Railroad Administration. 2011. *Draft Washington Union Station Main Hall Project Section 106 Assessment of Effect 2010-2011.* Washington, DC

United States Department of the Interior. 1983. Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. Access at http://www.cr.nps.gov/local-law/arch_stnds_0.htm on January 5, 2012.

APPENDIX A

NCPC SITE SELECTION APPROVAL

This page is intentionally left blank

COMMISSION ACTION

NCPC File No. 6863



MEMORIAL TO VICTIMS OF THE UKRAINIAN MANMADE FAMINE OF 1932-33

Reservation 78

Massachusetts Avenue and F Street, NW
Washington, DC

Submitted by the National Park Service

October 2, 2008

Commission Action Requested by Applicant

Approval of site selection pursuant to Public Law 109-340, and the Commemorative Works Act (40 U.S.C. 8905).

Commission Action

The Commission:

Approves the National Park Service's alternative site Reservation 78, as shown in Map File Number 1.11(73.10)42596, for the Memorial to Victims of the Ukrainian Manmade Famine, contingent upon the applicant's adherence to the following measures outlined as mitigation in the Executive Director's Finding of No Significant Impact for the site selection:

1. To protect park and visual resources and the socio-economic environment, the design must:
 - a. First create a successful and functional public space that befits this site's prominence in the National Capital and embraces its natural openness and place within significant L'Enfant rights of way. Any free-standing memorial element must be secondary in nature.
 - b. Respect the scale of the site and incorporate an understated design, as defined for representative sites of similar size and position in the Memorials and Museums Master Plan;
 - c. Incorporate significant green elements;
 - d. Integrate the site's apex with the small historic building to the west and with the rest of the block;
 - e. Remain open and integrated into the surrounding built environment and rights of way and remain accessible to passers-by;

- f. Respect the building lines of the surrounding rights of way, particularly along Massachusetts Avenue; if a vertical element is anticipated, orient its center along the building lines of Massachusetts Avenue and avoid vertical elements in the approximately 30 foot space from the building lines to the Reservation edge (40 feet from the building line to the curb along Massachusetts Avenue); if a more horizontal feature is anticipated, retain a low profile, which respects the Massachusetts Avenue right of way and views of the Postal Museum and Union Station).
2. To protect historic resources, prior to construction, perform a Phase 1 archeological identification survey.

Deborah B. Young
Secretary to the National Capital Planning Commission

APPENDIX B

SCOPING REPORT

This page is intentionally left blank

Memorial to Victims of the Ukrainian Famine-Genocide 1932-1933

Scoping Period Summary

January 17, 2012

The NPS and the Government of Ukraine propose to establish a memorial to the victims of the Ukrainian famine-genocide that took place between 1932 and 1933. The Ukrainian government is authorized to establish a memorial on federal land in the District of Columbia. The purpose of the proposed memorial is to honor the victims of the manmade famine that occurred in Ukraine between 1932 and 1933 and to inform and educate the public about those events because the manmade famine is largely unknown in the United States. The site of the proposed memorial was approved by the NPS, the National Capital Planning Commission (NCPC), and the Commission of Fine Arts in 2008, and is bound by Massachusetts Avenue NW and F and North Capitol Streets NW.

As part of the Memorial effort, NPS invited the public to participate in the scoping process and comment on the proposed Memorial to Victims of the Ukrainian Famine-Genocide of 1932-1933. The scoping process identified potential issues or concerns for consideration in the EA. The National Park Service (NPS) initiated public scoping for the Memorial to Victims of the Ukrainian Famine-Genocide 1932-1933 on November 22, 2011 for a 30-day comment period that closed on December 23, 2011. A public scoping meeting was held by the NPS and the Ukrainian government on December 7, 2011 at the Martin Luther King, Jr. Memorial Library in Washington, DC. Comments were received via PEPC and letters, and informally at the scoping meeting.

The following provides a summary of the content of the comments, both written and informal. Approximately 25 written comments were received, and are attached to this summary.

1. Comments stated support for the Field of Wheat design as the preferred alternative. The comments identified the elegant design and its ability to honor victims while reminding visitors of these events. The following comments are representative of those submitted:

- I believe that the preferred choice is not only the right choice, but an inspired choice. It has a fresh and unique approach to the concept of memorial. It creates a space for reflection as well as instigating a dialogue with the viewer. The Alternate is a rather brash singular statement, while the preferred scheme has an elegance and is understated visually but ultimately more powerful in its message. It engages the viewer with a rich palette which is unique in materials and the conveyance of the message.

In Washington, sometimes the intense and immediate meaning of our memorials gets lost over time and generations but the spaces never do. The spaces are tactile and real and of that moment. They are part of the urban fabric. This entry is a space that provides an opportunity for reflection as well as an accessible human lesson. It is about an outrageous human atrocity yet it allows for contemplation and solitude which is what our parks and memorials are about--- the counterbalance to our presumed lives. This presumption should never be taken lightly. This

memorial, with something as simple of a field of wheat as a metaphor, forces us to transcend our presumed daily bread and be reminded of the plight of those who were denied such a basic component of life. As a Washingtonian, I welcome fresh ideas to remind us of the plight of others which can occur under our not-so-watchful eyes at any time.

- On behalf of the Ukrainian National Women's League of America, the Washington area chapter, I would like to commend the CFA for selecting the "Fields of Wheat" design by Larysa Kurylas for the Washington DC Holodomor/Ukraine's Famine Memorial. Through her subtle yet moving design Ms Kurylas, a Washington area resident and architect, illustrates the tragedy of a forced famine inflicted upon innocent victims whose homeland was once known as "the bread basket of Europe." We strongly feel that the memorial design as envisioned by Ms Kurylas will truly speak to its viewers and perhaps even offer lessons for the future.
- I support the design of the "Field of Wheat" as the best way to project the idea of the famine-genocide. Prior to the establishment of the USSR by the Bolsheviks, Ukraine was universally known as the bread basket of Europe, and even during the 1933 holodomor, wheat was shipped out of Ukraine to feed the rest of the USSR. The blue and yellow motif of the Ukrainian flag also alludes to fields of wheat. As someone who has travelled to Ukraine many times since the fall of the USSR, I can personally testify to the rich, black "loamy" (sic) earth that produces such favorable conditions for growing wheat in Ukraine. Incidentally, Ukraine is arguably the biggest producer of buckwheat. And finally, I recall reading in a travel magazine years ago, that the quality of Ukrainian wheat is the most prized for pasta makers. Of course, Ukraine was also one of the 10 most highly industrialized regions in the world as part of the USSR. But it is the history of its wheat which tells the true history and story of Ukraine.
- I am writing in support of the 'Field of Wheat' Holodomor Memorial proposal by Larysa Kurylas. Ukraine was known as the "Bread Basket of Europe". I think it is appropriate that wheat is used to remember the victims of the Famine.
- The Field of Wheat is a beautiful and compelling memorial to a terrible tragedy. It captures the essence of Ukraine's classic beauty, and thus what was taken away from Ukrainians, the very the root of this horrific genocide-famine. The other memorial of two hands, while theoretically appropriate, is stylistically reminiscent of the Soviet-era occupation and could be interpreted as offensive.
- I favor the preferred design, by Larysa Kurylas, for a number of reasons. First, I like the use of the wheat both because of its relationship to nourishment, and to the Ukrainian land, and more generally because of its reference to the natural world. I also think it will be beautiful with the beech trees as a backdrop. It has more meaning to me than the alternative (the hands), which I feel I've seen too many variations of in other settings. Because the Field of Wheat is a solid face, as opposed to a figure that you would pivot around, it creates a kind of holding space (both open, on the Mass. Ave. side, and enclosed so you don't have to look at another street and a bar). This is especially important because the site is unavoidably noisy and active. The use of bas relief is attractive and practical not only because it suits the design, and bears reference to the

emergence of the famine, but also because people now seem to really want to touch things. This trend may be good or bad, but the Kurylas design encourages visitors to interact and become part of the memorial through touch. This in turn relates back to themes of earth and food.

- The Ukrainian American Coordinating Council Board and I reviewed the designs submitted for the Holodomor sculpture in Washington, and we unanimously and enthusiastically voted for the "Field of Wheat" design by Larysa Kurylas. The elegant simplicity of this design conveys the tragedy of Stalin's cruel conscription of every last stalk and grain of wheat from the "bread basket" of Europe in a most original manner. The lines and profile of the overall design are on the same high artistic plane as the best of Washington's monuments. This unique, installation--a wheat field in the nation's capital--will undoubtedly pique viewers' interest, and they are certain to come away with a new appreciation of an important historical lesson regarding Ukraine. Upon further contemplation, they may also appreciate the importance of safeguarding food supplies in the future in places where some vulnerable population might again be under threat of having its food source again withheld as a weapon against them.

2. Comments via PEPC addressed how the Memorial design relates to the urban context of the Memorial site. The following comments are representative of those submitted:

- It is evident that equal thought and care was given to the memorial's placement within its surroundings. To the extent possible on such a small site, the site design brilliantly balances the need to provide a peaceful, distinct space appropriate for reflection with the desire to fit in with the area surrounding the site. In fact, the flow of the site design goes beyond "fitting in"; it transforms the orphaned triangular parcel from a throw-away, afterthought to the centerpiece that connects the surrounding streets and buildings into an aesthetically pleasing whole. The orientation of the sculpture gives proper due to Massachusetts Avenue, allowing the surrounding areas to blend gently from the broad Avenue, through the memorial plaza, the eye gently rising from the bronze sculpture up through the deep purple leaves of the beech trees and beyond to F Street. It is both justified and desirable that this "famine" memorial screens the sidewalk seating areas of "The Dubliner" and "Irish Times" restaurants, from its primary view. For visual interest and to soften the edge of the memorial site, the designer has appropriately provided a wide swath of trees and shrubbery along F Street. The overall site design softens the institutional feel of the large, surrounding office and governmental buildings, bringing them down to scale, reminding us that we are all connected by the human experience.
- The monument is beautifully designed and would be a welcome improvement in the part of the District of Columbia in which it would be located.
- I am writing in support of the Field of Wheat Holodomor Memorial by Larysa Kurylas. This truly is a beautiful monument. The field of wheat represents ukrainian lands as they were known, as the breadbasket of Europe. This wheat was taken from their lands not only as their livelihood but also to break them, to starve them. And now, the wheat rises again, to remind everyone of what they suffered, what people suffer all over the world when they suffer from starvation for any reason. This

monument brings beauty to the space, it fits the space very well. It will make sense to anyone who passes it, who views it, a place for contemplation and peace.

3. Comments provided via PEPC also addressed the interpretive aspects of the design. The following comment is representative of those submitted:
 - I also like the preferred Memorial. My suggestion is that the words "Holodomor, 1932-1933" and the explanatory material on the right be put on a separate tablet on the right of the sculpture of the wheat. The sculpture is beautiful on it's own.
4. Comments expressed concern that for the preferred alternative, the pedestrian experience from F Street should be changed. The height and length of the sculpture block views across the site, altering the existing open nature of the site. The sculpture should provide a more open experience for pedestrians along F Street. (DCOP)
5. Comments stated that the District of Columbia open space requirements prohibit elements higher than 42 inches in height due to public safety concerns. (DCOP)
6. Comments stated that the Memorial site is categorized as a part of a Massachusetts Avenue system of small parks, as described in the CapitalSpace Plan. Therefore, it should be considered in the context of a series of small parks. (DCOP)
7. Comments advised that the base maps used to indicate the location of the site should be updated. The maps do not reflect recent changes three blocks west of the Memorial site between 3rd and 7th Streets. (CFA)
8. Comments stated that for the preferred alternative, the stone frame around the bronze relief should be minimized to the extent possible. Currently, the stone used to serve as mounting and backdrop to the Memorial creates a border to the relief. (CFA)
9. Comments expressed concern about the potential maintenance of paved surface materials. (NPS)
10. Comments stated that the Memorial should effectively convey the plight of the victims of the Ukrainian famine-genocide. Specifically, many of the comments stated that they preferred the Field of Wheat design because it most powerfully conveyed the message of the Memorial.
11. Comments requested that the effects on surrounding historic properties and the L'Enfant Plan; parking displacement, pedestrian and bicycle circulation, and land and sidewalk closures; and vegetation, stormwater, construction noise, and air quality be analyzed.
12. Comments asked that each alternative be evaluated for conformance with the measures outlined in NCPC's 2008 Site Selection FONSI and with the Comprehensive Plan for the National Capital, Federal Elements.

13. Comments noted that the Memorial designs should incorporate low-impact development techniques and environmentally-friendly materials and methods to reduce the environmental effect of the Memorial.

This page is intentionally left blank

APPENDIX C

DC STATE HISTORIC PRESERVATION OFFICE SECTION 106 REVIEW FORM

This page is intentionally left blank

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICE



**DC STATE HISTORIC PRESERVATION OFFICE
FEDERAL AGENCY SECTION 106 REVIEW FORM**

TO: Mr. Glenn DeMarr, National Park Service

ADDRESS: Via email to glenn_demarr@nps.gov

PROJECT NAME/DESCRIPTION: Ukrainian Famine Memorial 1932-1933 Design

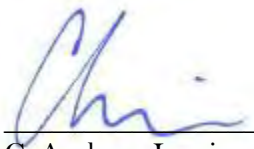
PROJECT ADDRESS/LOCATION DESCRIPTION: U.S. Reservation 78; Massachusetts Avenue
and North Capitol Street, NW

DC SHPO PROJECT NUMBER: 11-379

The DC State Historic Preservation Office (DC SHPO) has reviewed the above-referenced federal undertaking(s) in accordance with Section 106 of the National Historic Preservation Act and has determined that:

<input type="checkbox"/>	This project will have no effect on historic properties. No further DC SHPO review or comment will be necessary.
<input type="checkbox"/>	There are no historic properties that will be affected by this project. No further DC SHPO review or comment will be necessary.
<input type="checkbox"/>	This project will have no adverse effect on historic properties. No further DC SHPO review or comment will be necessary.
<input checked="" type="checkbox"/>	This project will have no adverse effect on historic properties conditioned upon fulfillment of the measures stipulated below.
<input type="checkbox"/>	Other Comments / Additional Comments (see below):

Based upon our review of the project designs and our discussions with NPS staff and the project architects, the DC SHPO believes that the proposed memorial is unlikely to constitute an adverse effect on historic properties. However, since further design refinements will probably be required, our "no adverse effect" determination is conditioned upon the NPS providing our office with updated submittals, notifying us of any preservation-related concerns expressed by consulting parties, and consulting further with us, as appropriate, to finalize designs for the memorial.

BY: 
C. Andrew Lewis
Senior Historic Preservation Specialist
DC State Historic Preservation Office

DATE: February 6, 2012