

Update to Consulting Parties

Consultation under Section 106 of the National Historic Preservation Act

Pennsylvania Avenue National Historic Site Plan

The National Park Service (NPS), with its partners, the General Services Administration (GSA), District of Columbia (District), and the National Capital Planning Commission (NCPC), is continuing Section 106 consultation on the proposed Pennsylvania Avenue National Historic Site Plan. The purpose of this update is to summarize prior consultation and to inform discussion at the next Section 106 consultation meeting, which is scheduled for May 29, from 5:00 pm-7:00 pm, at NCPC. Background materials on planning, jurisdiction, and resources are available at www.parkplanning.nps.gov/pennave. We invite you to comment on the proposal via this website by clicking on “open for comment.” NPS will accept comments through June 13, 2013.

For background on Pennsylvania Avenue planning and how it developed as a separate effort from the National Mall Plan, see <http://www.nps.gov/nationalmallplan/>.

Background

The National Park Service and partners are conducting this planning effort to prepare a long-term vision for the management of Pennsylvania Avenue. This is a follow-up to the National Mall Plan, and is focused on Pennsylvania Avenue as the nation's "Main Street," where inaugural parades, civil rights marches, and state funerals occur, and where nationally significant people and events will be commemorated in the future. The need for the plan is to address current problems and concerns about the management and maintenance of the avenue and its connections to the city, and to better achieve the goals of the 1974 Pennsylvania Avenue Development Corporation (PADC) Plan. Table 1 summarizes National Environmental Policy Act (NEPA), Section 106, and Commissions (Commission of Fine Arts, or CFA, and NCPC) consultation to date, as well as upcoming meetings.

Table 1. Summary of consultation activities

	NEPA	Section 106	Commissions
2006-2007	NPS held a public scoping meeting and comment period for the National Mall Plan, which included Pennsylvania Avenue		
2008	NPS held stakeholder meeting and completed a Choosing by Advantages (CBA) session to refine preferred alternative for the National Mall Plan	NPS held Section 106 consultation meeting for the National Mall Plan	NCPC participated in stakeholder meeting; CFA participated in CBA workshop
2009	NPS announced separation of the planning efforts for the National Mall and Pennsylvania Avenue; the National Mall Plan EIS continued, without Penn. Ave		
2010	NPS held several meetings with federal and District agencies to discuss Penn Ave. planning (National Gallery of Art (NGA), National Archives, DC Office of Planning (DCOP), NPS National Capital Region, NCPC, CFA, GSA, Architect of the Capitol)		

2011	Internal NPS planning occurred	
2012	NPS held meetings with NCPC, GSA, DCOP, NGA and NARA to discuss planning efforts	
March 2013	NPS developed internal Draft Environmental Assessment (EA)	
April 2013	NPS held meetings with GSA, NCPC, SHPO, DCOP, and Downtown Business Improvement District (BID) to discuss process and the proposed preferred alternative	
	NPS distributed draft EA for cooperating agencies to review- GSA, NCPC to be cooperating agencies; NARA and NGA are invited	NCPC is reviewing EA as cooperating agency
May 2013	NPS sent public meeting notice of combined NEPA/Section 106 public meeting and Section 106 consultation update	
	Cooperating agencies to host a federal tenants meeting (May 16 at GSA)	
	Cooperating agencies to host a private tenants meeting (May 17 at Navy Memorial)	
	Cooperating agencies to host an evening public meeting (May 29 at NCPC) for combined NEPA and Section 106 consultation: 45-minute overview of alternatives and potential impacts, 45-minute discussion of effects and mitigation	

Proposed Alternatives

NPS and its partners have developed alternative approaches for providing amenities for visitors, residents, and workers as well as ways to streamline management so that Pennsylvania Avenue can achieve its significance and purpose. These alternatives will be further discussed at the upcoming public meeting, and are subject to change based on consultation:

- No Action: continue current management
- Alt A: Emphasize historic grand character / no transfer of jurisdiction
- Alt B: Emphasize vibrant streetscape and public space / includes transfer of jurisdiction of sidewalks and other areas
- Preferred Alt: Maintain PADC goals and historic Avenue while creating vibrant streetscape and public space; includes jurisdictional transfers or option to manage through non-profit and partners

Area of Potential Effects, List of Historic Properties and Assessment of Effects

The proposed Area of Potential Effects, a description of historic properties, and an analysis of effects of the proposed alternatives are provided in the attachments. This material is extracted from NPS' draft EA, which will be further refined based on comments provided during the public meeting and comment period. It is therefore subject to change prior to its public release (anticipated in late summer of 2013). Consulting parties are invited to review and comment on this text.

Upcoming Consultation Milestones

The purpose of the Section 106 consultation meeting on May 29th, and the related comment period, is to discuss:

- Have historic resources been adequately identified?
- What are important resources to protect (what is contributing)?
- How can impacts be mitigated?

Because the nature of the proposal involves overall planning and management of the Pennsylvania Avenue National Historic Site, it is anticipated that the consulting parties may decide to develop a Programmatic Agreement, in order to define and commit to how historic properties would be protected from adverse effects.

Attachments:

Affected Environment for Cultural Resources (draft)
and Proposed Area of Potential Effects; Effects of Proposed
Alternatives on Cultural Resources (draft)

feet at rear and 267.57 feet at the edge of the 25-foot-wide defined sidewalk)

- Square 225, which contains the Washington Hotel and the Willard Hotel — boundary includes land south of a straight line aligned with building window wells, plus an irregular shaped outdoor paved space that extends to a raised outdoor plaza

Portions of some sidewalks or other areas are closely associated with adjacent federal facilities; for example, the south sidewalk between 3rd and 6th Streets and the Mellon Fountain area are closely associated with the National Gallery of Art; the Franklin Delano Roosevelt Memorial Stone is on the grounds of the National Archives; the White House visitor center is in the Commerce Building; and the Franklin statue is in front of the Old Post Office. Because of security requirements, the 75-foot-wide sidewalk south of the FBI building is no longer fully accessible to the public. The National Park Service recently completed a transfer to the National Gallery of Art a small triangular piece of land on the south side of Constitution Avenue at 5th Street; this parcel was part of the design for the National Gallery's East Building, and it provides staff vehicular access to the gallery.

While several approved locations for sidewalk cafés were included in the transfer from the Pennsylvania Avenue Development Corporation, NPS concession law does not generally allow adjacent businesses to use sidewalks for cafés. The National Park Service has permitted sidewalk cafés north of Freedom Plaza and Pershing Park.

CULTURAL RESOURCES

Cultural resources considered in this plan are cultural landscapes and historic structures (including historic districts, monuments, statues, and objects). Archeological resources, ethnographic resources, American Indian trust resources, and museum collections have been dismissed from further consideration (see page 19).

Only those cultural resources that are within the area of potential effects and that could be directly or indirectly affected by the implementation of any alternative are described in this document. In accordance with 36 CFR 800 and

section 106 of the National Historic Preservation Act, the area of potential effects has been developed in consultation with the D.C. Historic Preservation Office, the Commission of Fine Arts, the National Capital Planning Commission, and the Advisory Council on Historic Preservation (see the Area of Potential Effects map).

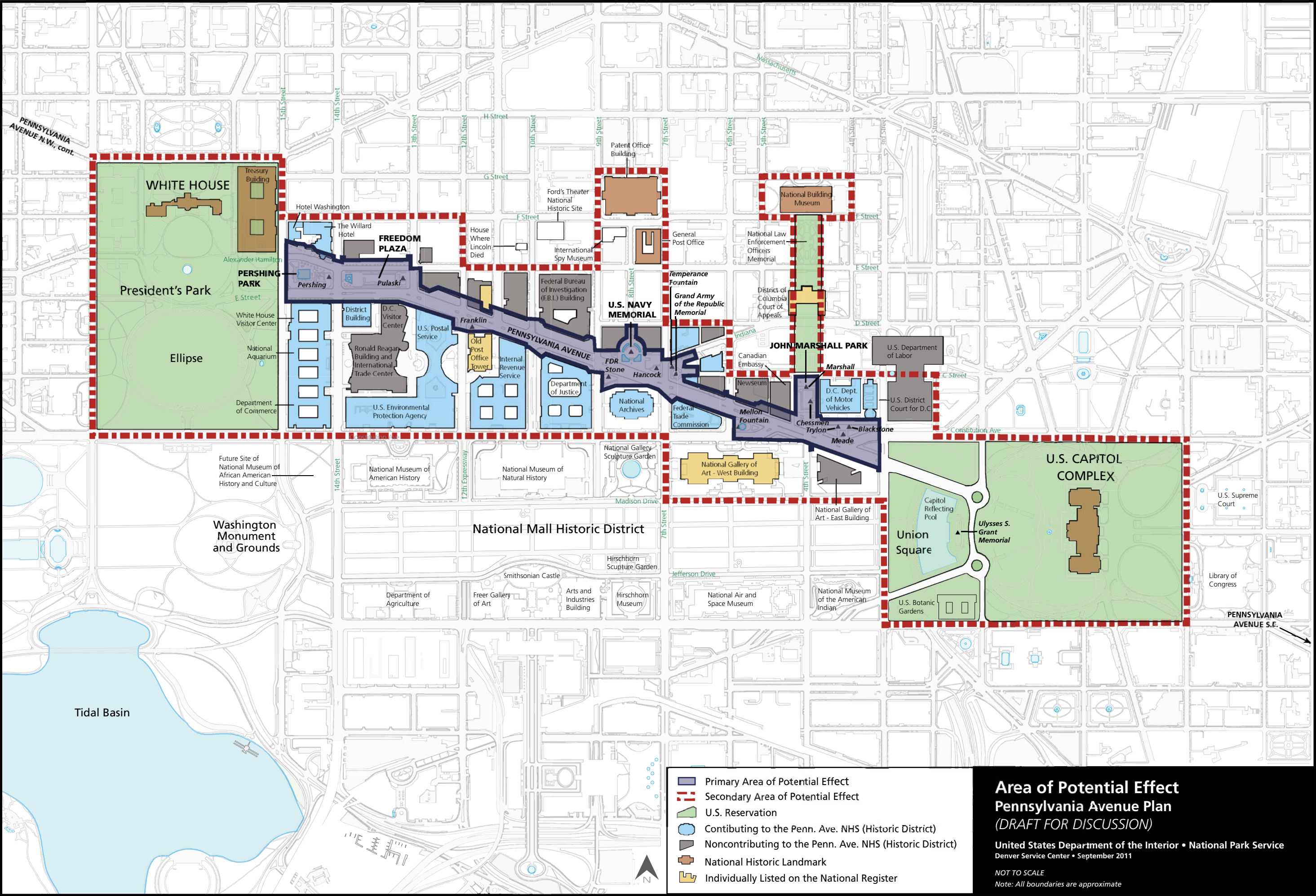
The area of potential effects includes the following resources that are listed on the National Register of Historic Places (NRHP) — 3 national historic landmarks, 17 individual properties, 4 historic districts, 3 cultural landscapes, and 15 monuments, statues, and objects. No properties that have been designated as world heritage sites by the United Nations Educational, Scientific and Cultural Organization are located within the area of potential effects. The historic context for Pennsylvania Avenue National Historic Site is discussed under “Foundation for Planning and Management” (beginning on page 1) and in “An Overview of Pennsylvania Avenue” (beginning on page 73).

Historic Districts

Four historic districts listed on the National Register of Historic Places — Pennsylvania Avenue National Historic Site, the Federal Triangle Historic District, the Downtown Historic District, and the Fifteenth Street Financial District — are at least partially included in the area of potential effects and are described below (see the Historic Districts map).

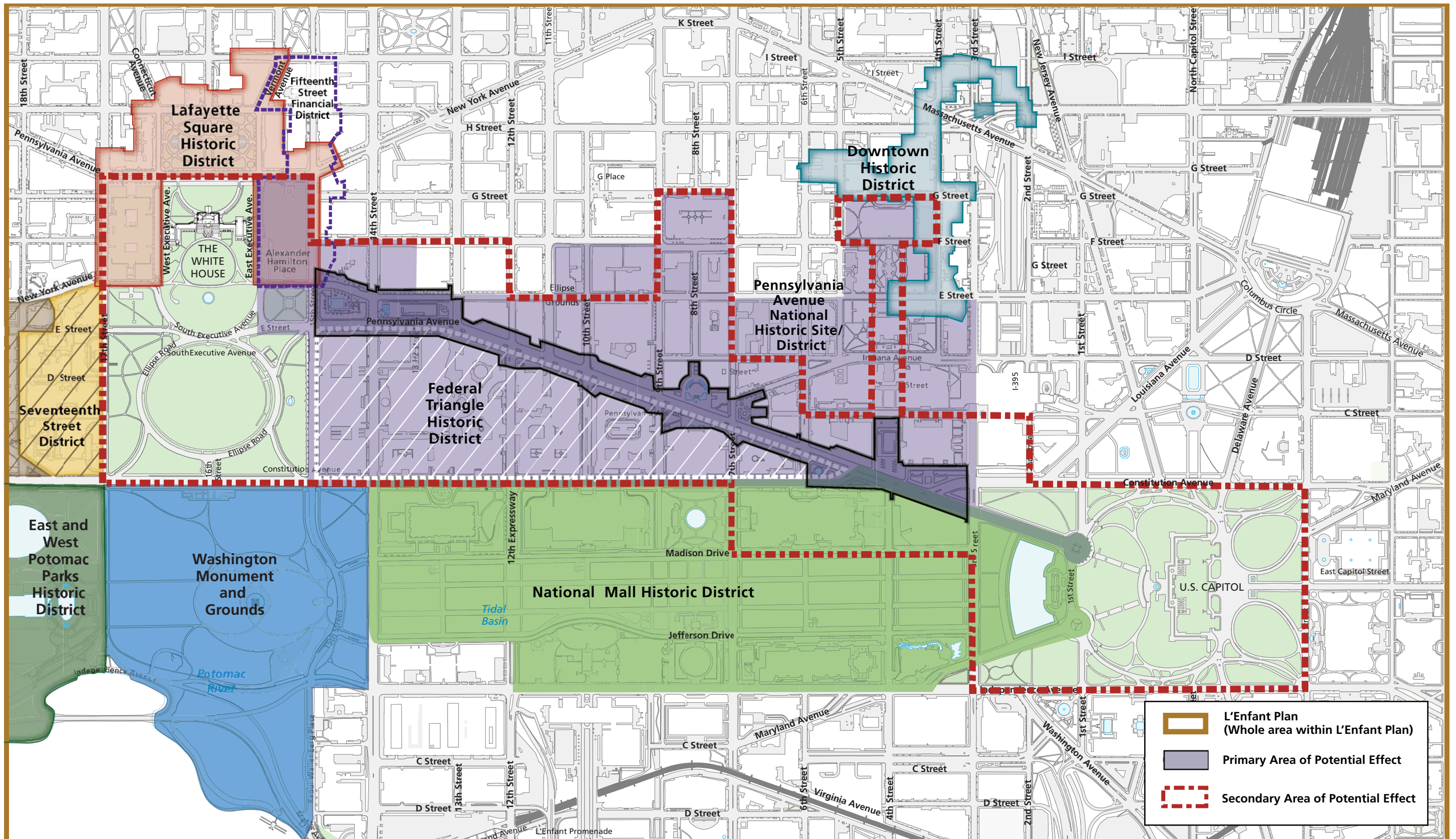
Pennsylvania Avenue National Historic Site

Pennsylvania Avenue National Historic Site is a linear, primarily paved roadway corridor between the U.S. Capitol and the White House. As previously discussed, the National Park Service administers the sidewalks along the north and south sides of the avenue, while the District of Columbia administers the paved roadway. Pennsylvania Avenue is lined with small parks, plazas, lampposts, trees, sculpture, and memorials. The avenue was originally designed to provide views of the U.S. Capitol at its southeast end and views of the White House at its northwest end; however, the construction of the U.S. Treasury Building in 1842 blocked the view of the White House.



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L'Enfant Plan
(Whole area within L'Enfant Plan)

Primary Area of Potential Effect

Secondary Area of Potential Effect

- | | | | |
|--|--|--|---|
| <div></div> National Mall | <div></div> Downtown | <div></div> Seventeenth Street | <div></div> Washington Monument and Grounds |
| <div></div> Federal Triangle | <div></div> Lafayette Square | <div></div> Northwest Rectangle (Eligible) | <div></div> U.S. Reservation |
| <div></div> Pennsylvania Avenue National Historic Site | <div></div> Fifteenth Street Financial | <div></div> East and West Potomac Park | |

National Register Historic Districts
Pennsylvania Avenue Plan
 (DRAFT FOR DISCUSSION)
 United States Department of the Interior • National Park Service
 Denver Service Center • September 2011
 NOT TO SCALE
 Note: All boundaries are approximate

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1 Pennsylvania Avenue National Historic Site was
 2 listed as a historic district on the National Reg-
 3 ister of Historic Places on October 15, 1966. In
 4 2003 the national register nomination was up-
 5 dated to provide additional documentation and
 6 a more in-depth explanation of historic and
 7 architectural significance (Robinson & Associ-
 8 ates 2003). The nomination was accepted in
 9 2007. Pennsylvania Avenue National Historic
 10 Site is significant in the areas of architecture, art,
 11 community planning and development, com-
 12 merce, landscape architecture, military, politics/
 13 government, and social history for the period
 14 1791 to 1962. The PADC projects implemented
 15 since 1974 are not listed as contributing ele-
 16 ments of the historic district nomination for
 17 Pennsylvania Avenue National Historic Site.

18 The boundaries of the historic district were de-
 19 fined in the joint resolution of Congress that
 20 ratified and confirmed the designation of the
 21 Pennsylvania Avenue National Historic Site as a
 22 historic district. This boundary extends beyond

23 the NPS-administered area to include buildings
 24 such as the National Building Museum, the
 25 Patent Office Building (Smithsonian American
 26 Art Museum / National Portrait Gallery), and
 27 Ford's Theatre, all of which are north of Penn-
 28 sylvania Avenue. The district also extends from
 29 the Peace Monument at Pennsylvania Avenue's
 30 southeast terminus (nearest the U.S. Capitol
 31 complex) to the U.S. Treasury Building and
 32 Hamilton Place at the avenue's northwest
 33 terminus.

34 Resources along Pennsylvania Avenue that con-
 35 tribute to the national historic site's listing on
 36 the National Register of Historic Places are
 37 shown in Table 4. Many of the buildings on
 38 Pennsylvania Avenue between 3rd and 15th
 39 Streets have been determined to be contributing
 40 elements of Pennsylvania Avenue National
 41 Historic Site. Monuments, sculpture, and other
 42 objects included in the national historic site are
 43 described later in this section.

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TABLE 4: BUILDINGS ON PENNSYLVANIA AVENUE WITHIN THE AREA OF POTENTIAL EFFECTS

Building	Address	Date	NRHP Status
North Side			
Department of Labor Building	Pennsylvania Avenue between 2nd and 3rd Streets	1974	Noncontributing to Pennsylvania Avenue NHS
E. Barrett Prettyman Federal Courthouse	Constitution Avenue and 3rd Street	1948–52	Contributing to Pennsylvania Avenue NHS
Canadian Chancery	5th Street and Pennsylvania Avenue	1982–88	Noncontributing to Pennsylvania Avenue NHS
The Newseum	6th Street and Pennsylvania Avenue	2008	Noncontributing to Pennsylvania Avenue NHS
601 Indiana Avenue	601 Indiana Avenue	1961	Noncontributing to Pennsylvania Avenue NHS
625 Indiana Avenue	625 Indiana Avenue	Circa 1985	Noncontributing to Pennsylvania Avenue NHS
633 Indiana Avenue	633 Indiana Avenue	1963–65	Noncontributing to Pennsylvania Avenue NHS
637 Indiana Avenue	637 Indiana Avenue	Circa 1826	Contributing to Pennsylvania Avenue NHS
639 Indiana Avenue	639 Indiana Avenue	1812–24	Contributing to Pennsylvania Avenue NHS
641 Indiana Avenue	641 Indiana Avenue	1812–24	Contributing to Pennsylvania Avenue NHS
601 Pennsylvania Avenue	601 Pennsylvania Avenue	1985	Noncontributing to Pennsylvania Avenue NHS
625 Pennsylvania Avenue	625 Pennsylvania Avenue	1853–54	Contributing to Pennsylvania Avenue NHS
627 Pennsylvania Avenue	627 Pennsylvania Avenue	1853–54	Contributing to Pennsylvania Avenue NHS
Market Square	701 and 801 Pennsylvania Avenue	1984–90	Noncontributing to Pennsylvania Avenue NHS

Building	Address	Date	NRHP Status
J. Edgar Hoover Building	Pennsylvania Avenue between 9th and 10th Streets	1967–72	Noncontributing to Pennsylvania Avenue NHS
1001 Pennsylvania Avenue	1001 Pennsylvania Avenue	1980–86	Noncontributing to Pennsylvania Avenue NHS
Evening Star	1101 Pennsylvania Avenue	1898–99	Contributing to Pennsylvania Avenue NHS; individually listed
1111 Pennsylvania Avenue	1111 Pennsylvania Avenue	2001	Noncontributing to Pennsylvania Avenue NHS
1201 Pennsylvania Avenue	1201 Pennsylvania Avenue	1984	Noncontributing to Pennsylvania Avenue NHS
1275 Pennsylvania Avenue	1275 Pennsylvania Avenue	1953–54, 1987	Noncontributing to Pennsylvania Avenue NHS
Warner Theatre	1299 Pennsylvania Avenue	1924	D.C. historic site, but not NRHP eligible; outside Pennsylvania Avenue NHS boundary
1301 Pennsylvania Avenue	1301 Pennsylvania Avenue	1981	Not NRHP eligible; outside Pennsylvania Avenue NHS boundary
The National Theater	1321 Pennsylvania Avenue	1922	Not NRHP eligible; outside Pennsylvania Avenue NHS boundary
J. W. Marriott Hotel	1331 Pennsylvania Avenue	1984	Noncontributing to Pennsylvania Avenue NHS
The Willard Hotel	1401 Pennsylvania Avenue	1901–04	Contributing to Pennsylvania Avenue NHS
Hotel Washington	Northeast corner, Pennsylvania Avenue and 15th Street	1917–18	Contributing to Pennsylvania Avenue NHS
Treasury Building	1500 Pennsylvania Avenue	1836–42, 1852–69	National historic landmark; contributing to Pennsylvania Avenue NHS;
American Security and Trust	1501 Pennsylvania Avenue	1905	Individually listed, contributing to Fifteenth Street Financial District; outside Pennsylvania Avenue NHS boundary
Riggs National Bank	1503-05 Pennsylvania Avenue	1824, ca. 1840	Individually listed; contributing to the Fifteenth Street and Lafayette Square Historic Districts; outside Pennsylvania Avenue NHS boundary
The White House	1600 Pennsylvania Avenue	1803, 1818, 1902, 1909, 1952	National historic landmark; outside Pennsylvania Avenue NHS boundary
South Side			
U.S. Capitol Complex	Constitution Avenue and Independence Avenue	1807, 1857/59, 1863	National historic landmark; outside Pennsylvania Avenue NHS boundary
National Gallery of Art, East Wing	Constitution Avenue between 3rd and 4th Streets	1981	Not eligible; outside Pennsylvania Avenue NHS boundary
National Gallery of Art, West Wing	Constitution Avenue between 4th and 7th Streets	1941	Individually listed (West Wing only); outside Pennsylvania Avenue NHS boundary
Federal Trade Commission Building (Apex Building)	600 Pennsylvania Avenue	1937–38	Contributing to Pennsylvania Avenue NHS
National Archives	Between 7th and 9th Streets, and between Pennsylvania and Constitution Avenues	1931–37	Contributing to Pennsylvania Avenue NHS
Department of Justice	Pennsylvania Avenue between 9th and 10th Streets	1931–35	Contributing to Pennsylvania Avenue NHS

Building	Address	Date	NRHP Status
Internal Revenue Service Building	Constitution Avenue between 10th and 12th Streets	1928–35	Contributing to Pennsylvania Avenue NHS
United States Post Office Building	Southwest corner, Pennsylvania Avenue and 10th Street	1934	Contributing to Pennsylvania Avenue NHS
Old Post Office	1100 Pennsylvania Avenue, NW	1892–99	Individually listed; contributing to Pennsylvania Avenue NHS
Ronald Reagan Building and International Trade Center (D.C. Visitor Center)	1300 Pennsylvania Avenue	1989–98	Noncontributing to Pennsylvania Avenue NHS
District Building (John A. Wilson Building)	1350 Pennsylvania Avenue	1904–08	Contributing to Pennsylvania Avenue NHS
Department of Commerce Building (White House Visitor Center)	14th and 15th Streets, Pennsylvania and Constitution Avenues	1926–32	Contributing to Pennsylvania Avenue NHS

1 **Federal Triangle Historic District**

2 The Federal Triangle Historic District consists
3 of a unified group of 10 federal office buildings
4 designed by different architects. The Old Post
5 Office building and the District Building (John
6 A. Wilson Building) were constructed between
7 1899 and 1908, and the rest were constructed
8 between 1926 and the 1930s except for the
9 Ronald Reagan Building and International Trade
10 Center, which was constructed in the 1990s.

11 The 1926 Public Buildings Act, which permitted
12 the federal government to hire private architects
13 to design federal buildings, heralded the begin-
14 ning of the country's largest public buildings
15 construction program. The planning for the
16 Federal Triangle was one of the last City Beauti-
17 ful efforts on such a monumental scale in the
18 nation.

19 The Federal Triangle Historic District is bound
20 by Pennsylvania Avenue on the north, Constitu-
21 tion Avenue on the south, 14th Street on the
22 west, and 6th Street on the east. This area
23 overlaps the southwest portion of the area of
24 potential effects defined for this document.

25 **Downtown Historic District**

26 The Downtown Historic District encompasses
27 the area that surrounds the 800 block of F Street
28 NW, on the north side of the Pennsylvania Ave-
29 nue. The historic district is significant as repre-
30 sentative of the earliest development of the dis-
31 trict's commercial core. Surrounded by such
32 monumental buildings as the Old Patent Office

33 (now occupied by the National Portrait Gallery
34 and the Smithsonian American Art Museum)
35 and the General Post Office, this block intro-
36 duces varied façades that enhance the architec-
37 tural qualities of these buildings and the L'En-
38 fant plan itself. The Downtown Historic District
39 is bound by 6th Street to the east, 15th Street to
40 the west, Massachusetts Avenue to the north,
41 and Pennsylvania Avenue to the south (NPS
42 1983).

43 **Fifteenth Street Financial District**

44 The Fifteenth Street Financial District overlaps
45 the northwest end of the area of potential effects
46 along the 15th Street corridor. Listed on the
47 National Register of Historic Places in 1981, this
48 historic district is a linear grouping of buildings
49 significant for their cohesive Neoclassical archi-
50 tecture and for their function as financial insti-
51 tutions or for their strong associations with fi-
52 nancial institutions and offices (NPS 1981). The
53 Fifteenth Street Financial District is composed
54 of 22 buildings that face 15th Street between
55 Sherman Park at its south end and McPherson
56 Square at its north end.

57 **Other Resources outside Pennsyl- 58 vania Avenue National Historic 59 Site**

60 Five properties that are individually listed on the
61 National Register of Historic Places are within
62 the area of potential effects — the U.S. Capitol
63 Complex, the National Gallery of Art West
64 Wing, American Security and Trust Company,

1 Riggs National Bank, and the White House.
 2 These properties are not within Pennsylvania
 3 Avenue National Historic Site or the planning
 4 area. This list is not a comprehensive inventory
 5 of all the historic structures listed on the
 6 national register that are within the area of
 7 potential effects, but only those structures
 8 located on or directly facing Pennsylvania
 9 Avenue, which could therefore be affected by
 10 proposed actions.

11 **U.S. Capitol Complex**

12 The U.S. Capitol complex is at the east end of
 13 the area of potential effects. The entire Capitol
 14 complex encompasses 274 acres, including the
 15 Capitol Building and its grounds. The Capitol
 16 terminates views along Pennsylvania Avenue
 17 from the northeast. The U.S. Capitol was desig-
 18 nated a national historic landmark in 1960 and
 19 was listed as a D.C. historic landmark in 1964
 20 (District of Columbia 2009).

21 **National Gallery of Art West Wing**

22 Built 1941, the West Wing of the National Gal-
 23 lery of Art (6th Street and Constitution Avenue,
 24 NW) was listed as a D.C. historic landmark in
 25 1968. It is also a contributing resource within the

26 National Mall Historic District, which is pri-
 27 marily south of the area of potential effects for
 28 this plan. The north façade of the National Gal-
 29 lery of Art's west wing directly faces Pennsyl-
 30 vania Avenue near its southeast end. The Na-
 31 tional Gallery of Art's East Wing does not con-
 32 tribute to the building's national register signifi-
 33 cance (District of Columbia 2009).

34 **American Security and Trust Company**

35 Built in 1904–05, the American Security and
 36 Trust Company (1501 Pennsylvania Avenue,
 37 NW) is a prominent Classical Revival building
 38 that served as the bank headquarters for the
 39 American Security and Trust Company. The
 40 building was listed as a D.C. landmark in 1964
 41 and was added to the National Register of His-
 42 toric Places in 1973. It is also a contributing re-
 43 source to the Fifteenth Street and Lafayette
 44 Square Historic Districts. The American Security
 45 and Trust Company building faces the west end
 46 of Pennsylvania Avenue.

47 **Riggs National Bank**

48 Riggs National Bank (1503–05 Pennsylvania Ave-
 49 nue, NW) was built in 1899–1902 in a Neoclassi-
 50 cal style, with an addition constructed in 1922–

FIGURE 7: MONUMENTS AND STATUES ALONG PENNSYLVANIA AVENUE



There are 19 monuments, statues, and objects facing or along Pennsylvania Avenue, 15 of which are contributing resources of Pennsylvania Avenue National Historic Site.

24. The building, which is opposite the Treasury Building, was listed as a D.C. landmark in 1964 and was added to the National Register of Historic Places in 1973. It is also a contributing resource for the Fifteenth Street and Lafayette Square Historic Districts (the latter historic district is north of the White House and is outside the area of potential effects). Riggs National Bank faces the west end of Pennsylvania Avenue within the area of potential effects.

The White House

Located at the western edge of the area of potential effects, the White House and its grounds

were designated a national historic landmark in 1960 and a D.C. landmark in 1964. The property is exempt from listing on the National Register of Historic Places. The site boundaries are 15th Street to the east, 17th Street to the west, Pennsylvania Avenue to the north, and Constitution Avenue to the south.

Monuments, Statues, and Objects

There are 19 monuments, statues, and objects facing or along Pennsylvania Avenue that could be directly impacted by any of the actions proposed in this document (see Table 5). Fifteen of these sites are designated as contributing re-

TABLE 5: MONUMENTS, STATUES, AND OBJECTS ON PENNSYLVANIA AVENUE WITHIN THE AREA OF POTENTIAL EFFECTS

Site	Location	Date	NRHP Status
Peace Monument	Pennsylvania Avenue and 1st Street	1877	Contributing object
Gen. George C. Meade Memorial	Meade Plaza, Pennsylvania Avenue and 3rd Street	1927, 1984	Contributing object
Trylon of Freedom	In front of the E. Barrett Prettyman Courthouse, Constitution Avenue and 3rd Street	1954	Contributing object
Lily Ponds	John Marshall Park, Pennsylvania Avenue between 3rd and 6th Streets	1982	Noncontributing object
Chess Players Statue	John Marshall Park, Pennsylvania Avenue between 3rd and 6th Streets	ca. 1983	Noncontributing object
John Marshall Statue	John Marshall Park, Pennsylvania Avenue between 3rd and 6th Streets	1985	Noncontributing object
Andrew W. Mellon Memorial Fountain	Mellon Park, 7th Street between Pennsylvania and Constitution Avenues	1952	Contributing object
Temperance Fountain	Indiana Plaza, 7th Street between Pennsylvania and Indiana Avenues	1880, 1987–88	Contributing object
Grand Army of the Republic Memorial	Indiana Plaza, 7th Street between Pennsylvania and Indiana Avenues	1909, 1987–88	Contributing object
Franklin Delano Roosevelt Memorial	Market Square Park, Pennsylvania Avenue between 7th and 9th Streets	1965, 1986–87, 1993	Contributing object
U.S. Navy Memorial	Market Square Park, Pennsylvania Avenue between 7th and 9th Streets	1983–87	Contributing object
Maj. Gen. Winfield Scott Hancock Statue	Market Square Park, Pennsylvania Avenue between 7th and 9th Streets	1896, 1986–87	Contributing object
Benjamin Franklin Statue	Pennsylvania Avenue and 12th Street, southeast corner	1889, 1982	Contributing object
Oscar S. Strauss Memorial Fountain	In front of the Ronald Reagan Building, 1300 Pennsylvania Avenue	1947	Contributing object
Brig. Gen. Casimir Pulaski Statue	Freedom Plaza, Pennsylvania Avenue between 13th and 14th Streets	1910, 1980	Contributing object
Bex Eagle	Pershing Park, Pennsylvania Avenue between 14th and 15th Streets	1982	Noncontributing Site
General John J. Pershing Memorial	Pershing Park, Pennsylvania Avenue between 14th and 15th Streets	1981, 1983	Contributing object
Alexander Hamilton Statue, Treasury Building	1500 Pennsylvania Avenue	1923	Contributing object
General William T. Sherman Statue	Sherman Park, 15th Street and Hamilton Place	1903	Contributing object

sources of Pennsylvania Avenue National Historic Site. The oldest statues and memorials include the Peace Monument, the Temperance Fountain, the Grand Army of the Republic Memorial, the Maj. Gen. Winfield Scott Hancock statue, the Benjamin Franklin statue, and the Brig. Gen. Casimir Pulaski statue.

In 1985 the National Park Service inventoried all of the statues, monuments, and memorials in Washington, D.C., including all of those within the area of potential effects for this plan, with the exception of the U.S. Navy Memorial, which was dedicated in 1987 and finished in 1991 (NPS 1985). The inventory's information relevant to the Pennsylvania Avenue National Historic Site was documented in the 2003 national register nomination update for the Pennsylvania Avenue National Historic Site (Robinson & Associates 2003). No new monuments or objects have been added to Pennsylvania Avenue since the completion of the U. S. Navy Memorial in 1991.

Cultural Landscapes

In compliance with section 110 of the National Historic Preservation Act, the National Park Service maintains inventories of its cultural landscapes. The NPS Cultural Landscape Inventory database identifies two cultural landscapes within the area of potential effects — Pennsylvania Avenue National Historic Site and the White House — President's Park South (see Table 6). A cultural landscape inventory has only been completed for President's Park South. While Pennsylvania Avenue National Historic Site has been preliminarily identified as a cultural landscape, a detailed study and an inventory need to be completed (NPS 2011a).

Pennsylvania Avenue National Historic Site

As a potential cultural landscape, Pennsylvania Avenue National Historic Site is defined as the corridor along Pennsylvania Avenue from the foot of Capitol Hill westward to 15th Street. Moving from east to west are seven component landscapes — Meade Plaza, John Marshall Park, Mellon Park, Indiana Plaza, Market Square Park, Freedom Plaza, and Pershing Park. Although the cultural landscape's significant features and patterns have not yet been identified in the NPS

TABLE 6: CULTURAL LANDSCAPES WITHIN THE AREA OF POTENTIAL EFFECTS

Component Landscapes	Location
Pennsylvania Avenue National Historic Site	
Meade Plaza	Pennsylvania Avenue and 3rd Street
John Marshall Park	Pennsylvania Avenue between 3rd and 6th Streets
Mellon Park	7th Street between Pennsylvania and Constitution Avenues
Indiana Plaza	7th Street between Pennsylvania and Indiana Avenues
Market Square Park	Pennsylvania Avenue between 7th and 9th Streets
Freedom Plaza	Pennsylvania Avenue between 13th and 14th Streets
Pershing Park	Pennsylvania Avenue between 14th and 15th Streets
White House — President's Park South	
Sherman Park	Northeast corner of the lawn south of the White House
1st Division Monument Park	Northwest corner of the lawn south of the White House
The Ellipse	Center of the lawn south of the White House

Cultural Landscape Inventory, they would likely include the avenue's numerous reservations and public squares, its spatial organization and circulation patterns for both vehicles and pedestrians, as well as the small-scale features such as ornamental iron fencing, terraces, fountains, plantings, paths, street furniture, and lighting. In 2012 the Cultural Landscape Foundation issued a report stating that the work implemented by the Pennsylvania Avenue Development Corporation should be recognized as contributing to the national historic site because of the unique and nationally significant components, which are integral to the avenue's history (Cultural Landscape Foundation 2012).

There are nine reservations within the Pennsylvania Avenue National Historic Site cultural landscape — the Peace Monument (Reservation 202A); Meade Plaza (Reservation 553); Mellon Park (Reservation 546); Indiana Plaza and the Temperance Fountain (Reservation 36A); Market Square Park, including the Franklin Delano Roosevelt Memorial (Reservation 35) and the U.S. Navy Memorial (Reservation 36); Freedom Plaza (Reservations 32 and 33); and Pershing Park (Reservation 617) (Robinson & Associates 2003).

White House — President's Park South

The White House — President's Park South cultural landscape contains Sherman Park, the First Division Monument, and the Ellipse as component landscapes (NPS 2011a).

Sherman Park is the portion of the President's Park South landscape that lies directly adjacent to the Pennsylvania Avenue corridor; it is bounded by South Executive Avenue, Hamilton Place, 15th Street, and E Street. It is a contributing element of Pennsylvania Avenue National Historic Site.

The First Division Monument and its surrounding grounds are in the northwest corner of the President's Park South (17th Street to the west, State Place to the north, South Executive Avenue to the east, and E Street to the south). Even though the First Division Monument component landscape is included in the area of potential effects, it is not directly adjacent to Pennsylvania Avenue, which is east of this area.

The Ellipse occupies the center of President's Park South. The area is defined by the oval-shaped roadway of Ellipse Road, which encircles a predominantly open grass-covered area. The low, open nature of the Ellipse maintains the important vista between the White House, the Washington Monument grounds, and the Thomas Jefferson Memorial. Although the Ellipse component landscape is included in the area of potential effects, it is not directly adjacent to Pennsylvania Avenue, which is to the northeast.

DEMONSTRATIONS, NATIONAL CELEBRATIONS, AND SPECIAL EVENTS

Background Information

The Avenue's Importance

Pennsylvania Avenue has served as our country's "main street" throughout its history. Because it links two branches of our government, represented by the U.S. Capitol and the White House, it has historically been used for state occasions, such as inaugural parades, victory parades, and state funeral corteges, as well as for public marches to air grievances. These uses are firmly

entrenched in law and public perceptions of what the avenue means to the American public.

In 1805 Thomas Jefferson began the tradition of parades to mark the inauguration of a president. Armed forces have marched along the avenue to celebrate the end of a war; most prominent in this celebratory role was the three-day parade of the Grand Army of the Republic at the end of the Civil War. Since the 1894 march by Coxey's Army to emphasize the plight of unemployed workers, the avenue has been frequently used as a public venue to air grievance and to seek redress from Congress. The avenue has also been a focal point as we mourn presidents, heroes, and people of note.

While the District of Columbia manages the 100-foot-wide roadway, where many parades and activities occur, the National Park Service manages the adjacent sidewalks and commemorative areas. First Amendment gatherings and marches, national celebrations, and special events all draw crowds that may stand or sit on bleachers placed on the sidewalks to watch the events on the street. Generally the avenue can sustain repeated use because it is paved, as are the adjacent sidewalks. Permitting and managing activities with large crowds requires a great deal of coordination among many agencies and organizations to address circulation, health and safety, security and security checkpoints, and gathering and dispersal locations. (It should be noted that Constitution Avenue is also used for many occasions — typically activities commemorating the Fourth of July, Columbus Day, Memorial Day, and Veterans Day.) The District of Columbia permits a number of annual street events on the avenue, primarily from late spring through early fall. The Metropolitan Police permit First Amendment activities.

Visitor Capacities

The capacity of various park areas was examined by applying several different square footage options per person. Physical capacities are most important for determining the capacities of specific venues for demonstrations, national celebrations, and permitted events, and these densities range from 5 square feet to 50 square feet per person.

cilitate the redevelopment and public use of this area

- public/private partners working together to achieve the goals of the 1974 *Pennsylvania Avenue Plan*

- the DC Department of Transportation's public inconvenience fee for the temporary use of public space, including streets and sidewalks, primarily during construction when these areas are closed to access

The impacts of these past and ongoing actions would be long-term, minor to moderate, and beneficial in terms of helping achieve the goals of the 1974 *Pennsylvania Avenue Plan* and potentially providing a supplementary funding source for future management.

The impacts of alternative B would be long-term, moderate to major, and beneficial because the sidewalks would be transferred to the jurisdiction of the city, which would unify management responsibility for roadways and sidewalks. However, the National Park Service would continue to manage certain park areas, with a separate management structure, and there would be no single authority for generating a reliable source of revenue for future site operations.

The impacts of past, present, and reasonably foreseeable actions, in combination with the impacts of alternative B, would be expected to result in long-term, moderate, beneficial cumulative impacts, with a substantial beneficial contribution from this alternative.

Conclusion

Compared to the no-action alternative, alternative B would have long-term, moderate to major, beneficial impacts on the management and jurisdiction of Pennsylvania Avenue National Historic Site as a result of transferring jurisdiction of the sidewalks to the District of Columbia. However, the National Park Service would continue to manage certain park areas, with a separate management structure. Also, there would be no single authority for generating revenue for future site operations. Ongoing partnerships would continue to be important to management. Together these changes would make it easier to achieve the goals of the 1974 *Pennsylvania Avenue Plan*. The impacts of past,

present, and reasonably foreseeable actions, in combination with the impacts of alternative B, would be expected to result in long-term, moderate, beneficial cumulative impacts, with a substantial beneficial contribution from this alternative.

IMPACTS ON CULTURAL RESOURCES

Methodology for Assessing Impacts

Impacts are analyzed for historic structures and cultural landscapes, which are collectively referred to as cultural resources for the purposes of this document. Historic structures include all historic buildings, structures, districts, monuments, and memorials described in "The Affected Environment" (see discussion beginning on page 80). As features within the planning area, all of these cultural resources would be similarly impacted by the alternatives; therefore, they are addressed together in this analysis to avoid repetition. The status of historic structures as contributing or noncontributing elements of Pennsylvania Avenue National Historic Site, or the NRHP status of other historic structures, is noted where it is relevant to the impact analysis.

As described in "The Affected Environment," two cultural landscapes have been identified in the plan's area of potential effects — the White House–President's Park South and Pennsylvania Avenue National Historic Site.

- **White House–President's Park South** — Because of the White House–President's Park South cultural landscape is at the far west end of Pennsylvania Avenue, its features and patterns would not be directly impacted by any of the actions considered in the alternatives. Potential indirect impacts to the White House cultural landscape caused by the addition of new small-scale features at Freedom Plaza (a noncontributing feature) and Pershing Park (a noncontributing feature) under the action alternatives would be barely perceptible because these areas can only be partially viewed from the vicinity of Hamilton Place, a small area south the U.S. Treasury Building. The majority of the White House cultural landscape viewshed toward Pennsylvania

Avenue is blocked by the Treasury Building; thus, most of the actions of any alternative would be unseen. Indirect adverse impacts under all alternatives to the White House cultural landscape would be site-specific to Hamilton Place. Such impacts would be temporary to long-term in duration, and negligible in intensity.

- **Pennsylvania Avenue** — Impacts to the cultural landscape's spatial organization, landscape features, and circulation patterns are analyzed. The numerous small-scale features along Pennsylvania Avenue, such as monuments, fountains, and other structures are addressed under historic structures (such structures would likely contribute to a Pennsylvania Avenue cultural landscape, which has not yet been documented).

Potential impacts to contributing elements or character-defining features of a resource are described in terms of whether they would be direct or indirect, as well as their context (site-specific, local, regional, or national), duration, intensity, and type (beneficial or adverse).

Context

The geographic extent of impacts could be site-specific, localized, regional, or national, as defined below:

- **Site-specific** — The impact would only be perceptible in the immediate vicinity of the resource.
- **Localized** — The impact would be perceptible from a distance of up to three city blocks from the resource.
- **Regional** — The impact would be perceived to affect a larger area, such as the Washington, D.C., metropolitan area.
- **National** — The impact would be perceived as being important to a national audience, such as an impact affecting a national icon.

Duration of Impacts

Impacts could be temporary, short-term, long-term, or permanent.

- **Temporary** — The impact would usually last for a few hours or up to two days, such as a road closure for a day or less or limited access to an area during a demonstration.
- **Short-term** — The impact would generally last up to one year or the life of a construction project.
- **Long-term** — The impact would last longer than one year or for the life of the plan (up to 50 years).
- **Permanent** — The impact would last beyond the life of the plan (50 years or longer).

Impact Intensity Levels

The following impact thresholds were defined for impacts on cultural resources:

- **Negligible** — The impact would be at the lowest level of detection — barely measurable, with no perceptible consequences.
- **Minor** — The impact on character-defining features, elements, or patterns would be perceptible or measurable, but it would be slight and localized, resulting in little, if any, loss of integrity.
- **Moderate** — The impact would alter character-defining features, elements, or patterns but would not diminish the integrity of the building, structure, or landscape to the extent that its eligibility for listing on the National Register of Historic Places would be jeopardized.
- **Major** — The impact would alter character-defining features, elements, or landscape patterns, diminishing the integrity of the building, structure, or landscape to the extent that it would no longer be eligible for listing on the National Register of Historic Places.

Type of Impact

Beneficial impacts would restore or rehabilitate resources, or incompatible or noncontributing features would be removed. Adverse impacts would result in a loss in the overall integrity of a historic structure or cultural landscape.

Regulations and Policies: National Historic Preservation Act Section 106

Impacts on cultural resources are described in terms of type, context, duration, and intensity, which is consistent with the CEQ regulations that implement the National Environmental Policy Act. In accordance with the Advisory Council on Historic Preservation's regulations for implementing section 106 of the National Historic Preservation Act (36 CFR Part 800), impacts on cultural resources are also to be identified and evaluated by (1) determining the area of potential effects; (2) identifying cultural resources present in the area of potential effects that are either listed on or eligible for listing on the National Register of Historic Places; (3) applying the criteria of adverse effect to affected cultural resources eligible for or listed on the national register; and (4) considering ways to avoid, minimize, or mitigate adverse effects.

Under the Advisory Council's regulations a determination of either *adverse effect* or *no adverse effect* must also be made for affected cultural resources listed on or eligible for listing on the national register. An *adverse effect* occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion on the national register, e.g., diminishing the integrity (or the extent to which a resource retains its historic appearance) of its location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the alternatives that would occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5). A determination of *no adverse effect* means that there is an effect, but that the effect would not diminish the characteristics of the cultural resource that qualify it for inclusion on the national register.

CEQ regulations and NPS Director's Order #12 (NPS 2001a) also call for a discussion of mitigation, as well as an analysis of how effective the mitigation would be in reducing the intensity of a potential impact, e.g. reducing the intensity of an impact from major to moderate or minor. Any resultant reduction in intensity of impact due to mitigation, however, is an estimate of the effectiveness of mitigation under only under the National Environmental Policy Act. It does not suggest that the level of effect as defined by

section 106 is similarly reduced. Cultural resources are nonrenewable resources, and adverse effects generally consume, diminish, or destroy the original historic materials or form, resulting in a loss in the integrity of the resource that can never be recovered. Therefore, while actions determined to have an adverse effect under section 106 may be mitigated, the effect remains adverse.

A section 106 summary is included in the following impact analysis. The summary is an assessment of the effect of implementing the alternative, based on the criteria of effect and adverse effect found in the regulations of the Advisory Council on Historic Preservation.

Impacts of the No-Action Alternative

Direct and Indirect Impacts

General Actions

Management and Jurisdiction. Under the no-action alternative structures currently owned and managed by the National Park Service within Pennsylvania Avenue National Historic Site would remain under its jurisdiction. The National Park Service would continue to manage the sidewalks, plazas, and parks formerly managed by the Pennsylvania Avenue Development Corporation, while the District of Columbia would continue to manage the avenue roadway. The National Park Service would continue to accommodate street and community activities in cooperation with the District of Columbia. Continuation of this management framework would have no direct or indirect impacts to historic structures.

The National Park Service, the General Services Administration, and the National Capital Planning Commission would continue to implement the goals and objectives of the 1974 *Pennsylvania Avenue Plan* and to comply with the federal Commemorative Works Act. The National Park Service would continue to work with its partners to maintain the avenue's grand character, which is a historically significant element of Pennsylvania Avenue National Historic Site. Historic monuments and memorials would continue to be preserved. The National Park Service could continue to use a

1 special use permit to allow commercial services
2 in sidewalk areas not included in the PADC
3 easement. No new features would be introduced
4 or activities implemented that would have
5 adverse impacts to the character-defining fea-
6 tures of historic structures in or near the avenue
7 or the cultural landscape. As a result, there
8 would be no direct or indirect impacts to
9 cultural resources under the no-action
10 alternative.

11 ***Special Events and Demonstrations.*** Pennsyl-
12 vania Avenue would continue to be used as a
13 corridor for presidential Inaugural Parades and
14 other ceremonial functions. Access to public
15 transportation would continue without distur-
16 bance to historic structures. First Amendment
17 demonstrations would continue to be permitted
18 at available spaces in accordance with federal
19 regulations (36 CFR 7.96(g)(1)). Public visitor
20 use during demonstrations could result in direct,
21 site-specific, permanent adverse impacts to his-
22 toric structures in the form of wear and tear to
23 the physical integrity of a structure, but the
24 effects would be negligible to minor in intensity.

25 ***Access and Circulation.*** The existing signage
26 system would remain in place under this alterna-
27 tive, with no impact on cultural resources.

28 ***Urban Design Character.*** Park managers would
29 work with other federal agencies to coordinate
30 the installation of perimeter security elements.
31 Sidewalks, light standards, street trees, and street
32 furnishings would be maintained without sub-
33 stantial changes. These actions would result in
34 indirect, site-specific, long-term, negligible,
35 adverse impacts on cultural resources.

36 ***Visitor Information, Education, and Enjoy-***
37 ***ment.*** Interpretive activities, such as NPS
38 seasonal walking tours, would continue to high-
39 light the history and development of the federal
40 city. These tours would have no direct or indi-
41 rect adverse impacts to cultural resources under
42 the no-action alternative.

43 “No skateboarding” signs and ranger patrols
44 would discourage skateboarding in the plazas
45 and along low walls where illegal skateboarding
46 occurs.

47 ***Actions for Specific Areas***

48 ***George Meade Memorial.*** The General Meade
49 Memorial (a contributing feature) would contin-
50 ue to be maintained and preserved by the Na-
51 tional Park Service in its current condition under
52 the no-action alternative. There would be no
53 adverse impacts to this historic memorial.

54 ***John Marshall Park.*** The National Park Service
55 would support the rehabilitation of John Mar-
56 shall Park by a friends group. John Marshall
57 Park and its components are noncontributing
58 features of Pennsylvania Avenue National
59 Historic Site, and no impacts to historic struc-
60 tures are foreseen as a result of rehabilitating this
61 site. Additionally, these rehabilitation efforts
62 would not adversely impact the setting, feeling,
63 or association of adjacent historic structures.

64 ***U.S. Navy Memorial.*** While some small main-
65 tenance projects would be undertaken under the
66 no-action alternative at the U.S. Navy Memorial
67 (a contributing feature), no major actions are
68 planned. Therefore, no impacts to historic
69 structures would occur at this site.

70 ***Other Areas.*** The small Pei-designed triangular
71 property (a noncontributing feature) adjacent
72 the National Gallery of Art’s West Wing at 5th
73 and Pennsylvania and was transferred in to the
74 National Gallery of Art as of January 15, 2013.
75 Activities at all other plazas, including Indiana
76 Plaza, the north frontage of the National
77 Archives, Freedom Plaza, and Pershing Park,
78 would remain unchanged. The National Park
79 Service would continue to maintain and preserve
80 these sites and allow public access to them.
81 Continuation of these activities would result in
82 no impacts to historic structures.

83 ***Summary***

84 Overall long-term impacts on historic structures
85 under the no-action alternative would be site-
86 specific, long-term to permanent, negligible to
87 minor, and adverse.

88 ***Cumulative Impacts***

89 Past, present, and reasonably foreseeable actions
90 that would occur within or adjacent to Pennsyl-
91 vania Avenue National Historic Site and that
92 could have an effect on historic structures are
93 discussed below.

1 The redevelopment of Pennsylvania Avenue
 2 under the direction of the Pennsylvania Avenue
 3 Development Corporation between 1974 and
 4 1996 substantially enhanced the character of the
 5 avenue. New projects undertaken as a result of
 6 PADC efforts included John Marshall Park, the
 7 U.S. Navy Memorial, Freedom Plaza, and Persh-
 8 ing Park. Indiana Plaza and Benjamin Franklin
 9 Plaza were upgraded. The impacts of these
 10 projects were direct and indirect, site-specific to
 11 national in context, long-term to permanent,
 12 and beneficial.

13 The Architect of the Capitol is considering the
 14 development of the U.S. Senate Youth Park and
 15 U.S. Botanic Garden Education and Outreach
 16 Center in the area north of Pennsylvania Avenue
 17 and east of 3rd Street. Pennsylvania Avenue at
 18 this location (between 1st and 3rd Streets) is
 19 used for parking. Plans for this project are un-
 20 known at this time; however, the National Park
 21 Service, the General Services Administration,
 22 and the National Capital Planning Commission
 23 would work with the Architect of the Capitol to
 24 ensure that any development would be compat-
 25 ible with the historic context of Pennsylvania
 26 Avenue National Historic Site, and no adverse
 27 impacts would be expected.

28 The plan to redevelop the Old Post Office build-
 29 ing would preserve and restore the building's
 30 masonry exterior and rehabilitate its metalwork
 31 and fenestration (US GSA 2012b). Restoration
 32 would include removing a noncontributing
 33 structure on the south side that blocks the origi-
 34 nal historic façade. Because all project activities
 35 would follow the *Secretary of Interior's Stan-*
 36 *dards for Historic Properties* and the *Secretary of*
 37 *Interior's Standards for Rehabilitation*, these
 38 activities would result in beneficial impacts to
 39 the historic structure. The addition of new win-
 40 dows in certain areas and the removal of a small
 41 portion of the building's historic fabric would
 42 result in a site-specific, adverse impact on the
 43 Old Post Office building, but the intensity of the
 44 impact would be kept to the minor level because
 45 the changes would be informed by historical
 46 documentation, and they would be relatively
 47 minimal as part of an effort to preserve the struc-
 48 ture's historic integrity. The redevelopment plan
 49 for regrading the C Street plaza in the area of
 50 12th Street and south of the Old Post Office has
 51 potential for minor adverse impacts to archeo-

52 logical resources, if archeological resources were
 53 discovered in these areas. Impacts would be
 54 localized and permanent. The General Services
 55 Administration has requested that the Benjamin
 56 Franklin Plaza and adjacent sidewalks be trans-
 57 ferred to its jurisdiction from the National Park
 58 Service. As a federal agency, the General Ser-
 59 vices Administration would ensure that the plaza
 60 was managed in accordance with the National
 61 Historic Preservation Act. Therefore, this
 62 transfer would result in no impact to historic
 63 structures.

64 Tours of the historic 315-foot clock tower,
 65 which makes the Old Post Office building visible
 66 for miles around, are managed by the National
 67 Park Service under an interagency agreement.
 68 The Park Service expects to continue to provide
 69 tower tours as the building is redeveloped.

70 The *Memorials and Museums Master Plan*
 71 (NCPC 2001) identifies Freedom Plaza and the
 72 triangle at the intersection of Constitution and
 73 Pennsylvania Avenues as future national memo-
 74 rial sites. Any national memorials at these sites
 75 would be developed in accordance with the fed-
 76 eral Commemorative Works Act, and it is as-
 77 sumed that new structures would complement
 78 Pennsylvania Avenue National Historic Site and
 79 add to its national significance. No adverse
 80 impacts would be anticipated.

81 The *Monumental Core Framework Plan* (NCPC
 82 2009) recommends a mixed-use destination on
 83 Pennsylvania Avenue at the current location of
 84 the J. Edgar Hoover Building, as well as the Old
 85 Post Office building, which is being addressed
 86 by the General Services Administration. Poten-
 87 tial redevelopment of the FBI block (Squares 379
 88 and 378) would be conducted in accordance
 89 with the goals of the NCPC *Framework Plan* and
 90 would seek to provide a mixed-use development
 91 that would better relate to Pennsylvania Avenue.
 92 The adverse impacts of such development on the
 93 corridor's historic structures and cultural land-
 94 scapes would be direct and indirect, localized,
 95 long-term, and minor.

96 The *Framework Plan* also recommends addi-
 97 tional entrances to Metro stations at the Federal
 98 Triangle and Archives–Navy Memorial–Penn
 99 Quarter to improve pedestrian access and
 100 circulation, which the National Park Service
 101 would continue to support. New entrances

1 would not be visible from Pennsylvania Avenue,
2 and there would be no impact on cultural re-
3 sources.

4 Actions within Pennsylvania Avenue National
5 Historic Site would not affect proposed actions
6 in the *Comprehensive Design Plan for the White*
7 *House and President's Park* or the *Design Guide-*
8 *lines for the White House and President's Park*.

9 Implementing the NPS *Visitor Transportation*
10 *Study*, including a loop along Pennsylvania Ave-
11 nue, would have no effect on historic structures
12 within the national historic site.

13 DC Cultural Tourism, in partnership with the
14 General Services Administration and the Na-
15 tional Park Service, installed six interpretive
16 signs along Pennsylvania Avenue for the Federal
17 Triangle Heritage Trail. These interpretive signs
18 have enhanced historical interpretation, with an
19 indirect, site-specific, long-term, negligible,
20 adverse impact to cultural resources.

21 The city has installed three Capital Bikeshare
22 facilities near Pennsylvania Avenue, and addi-
23 tional facilities could be installed in the future,
24 with indirect, site-specific, long-term, negligible,
25 adverse impacts to cultural resources.

26 The use of Segway® HTs in the corridor, primar-
27 ily for visitor tours, would be managed compat-
28 ibly with the NAMA "Superintendent's Com-
29 pendium" of regulations. Potential adverse
30 impacts from the use of Segway® HTs within the
31 corridor in the form of unintentional wear and
32 tear to the materials of historic structures or
33 cultural landscape features would remain direct,
34 site-specific, long-term, and negligible to minor.

35 Ice skating is no longer provided at Pershing
36 Park. The ice skating rink has not been identified
37 as a contributing component of any of the
38 historic structures or historic districts, so there
39 would be no impacts on cultural resources from
40 stopping this activity.

41 The impacts of past, present, and reasonably
42 foreseeable actions on Pennsylvania Avenue
43 National Historic Site would be localized to
44 national in terms of context, long-term to per-
45 manent, and beneficial. The impacts of actions
46 under the no-action alternative would be
47 localized and site-specific, long-term to perma-

48 nent, negligible to minor, and adverse. The no-
49 action alternative would have little effect on the
50 long-term to permanent, and beneficial, cumula-
51 tive impacts.

52 **Conclusion**

53 Impacts on cultural resources under the no-
54 action alternative would be site-specific and
55 localized, long-term to permanent, negligible to
56 minor, and adverse. The overall impacts of past,
57 present, and reasonably foreseeable actions,
58 when added to the impacts of the no-action
59 alternative, would result in site-specific, long-
60 term, beneficial cumulative impacts. The impacts
61 associated with the no-action alternative would
62 be a small component of the cumulative impacts.

63 **NHPA Section 106 Summary**

64 After applying the Advisory Council on Historic
65 Preservation's criteria of adverse effects (36 CFR
66 800.5), the National Park Service concludes that
67 implementation of the no-action alternative
68 would have no adverse effect on historic struc-
69 tures or cultural landscapes. Further consulta-
70 tion would be required to make a final determi-
71 nation of effect on these resources and to iden-
72 tify appropriate mitigation measures.

73 **Impacts of the Preferred** 74 **Alternative**

75 **Direct and Indirect Impacts**

76 **General Actions**

77 **Management and Jurisdiction.** While the Na-
78 tional Park Service would continue planning
79 responsibilities jointly with the National Capital
80 Planning Commission and the General Services
81 Administration, the establishment of a public/
82 private management entity under the preferred
83 alternative to manage and coordinate daily
84 operations along the avenue would have a
85 beneficial impact on cultural resources because
86 this entity would provide additional oversight
87 for all aspects of resource management along the
88 avenue, including the monitoring and protection
89 of cultural resources. Beneficial impacts to all
90 cultural resources would be long-term and range
91 from site-specific to regional in context.

92 The public/private management entity would
93 implement the goals and objectives of the 1974

1 *Pennsylvania Avenue Plan* and would comply
 2 with the federal Commemorative Works Act.
 3 Pennsylvania Avenue would remain a nationally
 4 significant and culturally symbolic ceremonial
 5 grand avenue and America's "Main Street." It
 6 would offer space for additional commemora-
 7 tion, as well as diverse cultural and public activi-
 8 ties, while showcasing historic plans and views
 9 of the nation's capital and providing additional
 10 educational opportunities for people to learn
 11 about the nation's three branches of government
 12 and the federal city.

13 Under the preferred alternative the National
 14 Park Service would retain sole jurisdiction over a
 15 limited number of memorial park sites, although
 16 jurisdiction of certain areas and monuments
 17 along Pennsylvania Avenue could be transferred
 18 to other agencies for the purpose of better
 19 achieving the goals of the *Pennsylvania Avenue*
 20 *Plan* (see "Actions for Specific Areas" below).
 21 These transfers would not adversely impact his-
 22 toric structures or the cultural landscape be-
 23 cause the resources would continue to be man-
 24 aged in compliance with the National Historic
 25 Preservation Act, as all federal agencies are
 26 required to protect and preserve cultural re-
 27 sources under this law. Therefore, the potential
 28 transfer of the jurisdiction of historic properties,
 29 such as monuments or memorials, to another
 30 federal agency would have no impact on these
 31 historic structures or to the settings and features
 32 of the Pennsylvania Avenue cultural landscape.

33 **Cultural Resources.** Transferring the jurisdic-
 34 tion of the sidewalks and certain lawn areas to
 35 the District of Columbia would mean that these
 36 areas would be transferred out of federal
 37 jurisdiction, and the District would not be legally
 38 required to comply with the National Historic
 39 Preservation Act. In this case the National Park
 40 Service and partner agencies would use a trans-
 41 fer agreement to ensure that all historic struc-
 42 tures would continue to be protected and
 43 preserved in accordance with the National
 44 Historic Preservation Act. The agreement would
 45 also ensure that the District's management of the
 46 sidewalks and associated areas would continue
 47 the goals of the *NCPC Museums and Memorials*
 48 *Master Plan* and the *Monumental Core Frame-*
 49 *work Plan*. This procedure would ensure that
 50 there would be no impacts to historic structures
 51 or the Pennsylvania Avenue cultural landscape

52 under the preferred alternative. For the interim
 53 period before the transfer occurred, the
 54 dedication of NPS funding for future
 55 maintenance or preservation-related projects
 56 involving historic structures in accordance with
 57 the *Secretary of the Interior's Standards for the*
 58 *Treatment of Historic Properties* could result in
 59 beneficial impacts to cultural resources.

60 **Special Events and Demonstrations.** Under the
 61 preferred alternative the public/private manage-
 62 ment entity would accommodate more visitor
 63 and community activities in cooperation with
 64 the District of Columbia. Pennsylvania Avenue
 65 would gain the addition of public art displays,
 66 fairs, and other types of urban activities. The
 67 addition of long-term or temporary art, seasonal
 68 banners, and other exhibitions in the corridor,
 69 as well as an increase in visitor activity, would
 70 result in direct, site-specific, permanent, adverse
 71 impacts to the historic buildings and districts in
 72 the form of wear and tear to structures, but the
 73 intensity of such impacts would be negligible to
 74 minor.

75 For sites under NPS jurisdiction, First Amend-
 76 ment demonstrations and inaugural activities
 77 would continue to be permitted in accordance
 78 with federal regulations (36 CFR 7.96(g)(1)), and
 79 such permitting would be coordinated by the
 80 public/private management entity. Continuing
 81 visitor use during demonstrations would result
 82 in direct, site-specific, permanent, adverse im-
 83 pacts to the historic buildings and districts in the
 84 form of wear and tear to structures, but the in-
 85 tensity of such effects would be negligible to
 86 minor.

87 **Access and Circulation.** Under the preferred
 88 alternative the public/private management entity
 89 would pursue improvements to pedestrian ori-
 90 entation within Pennsylvania Avenue National
 91 Historic Site by working with the District of
 92 Columbia to encourage safer, better-marked
 93 crosswalks, along with improved traffic islands,
 94 traffic lights, and other crosswalk-related sign-
 95 age. These changes would be small in scale and
 96 would follow the compatible design standards
 97 set for the avenue. Therefore these actions
 98 would result in direct, site-specific, long-term,
 99 adverse impacts to the setting of historic struc-
 100 tures and the Pennsylvania Avenue cultural

1 landscape, but the intensity of such effects
2 would be negligible to minor.

3 **Urban Design Character.** Under the preferred
4 alternative the public/private management entity
5 would also establish context-sensitive guidelines
6 for small-scale street furnishings, such as media
7 distribution boxes, new lighting, tables, or chairs
8 to encourage visitor activity while ensuring that
9 these objects were compatible with the historic
10 corridor. The addition of these compatible
11 small-scale features would have site-specific or
12 localized, long-term, negligible to minor, adverse
13 impacts to historic structures and cultural
14 landscapes.

15 The National Park Service through the public/
16 private management entity would support the
17 District in developing a unified design palette
18 and parameters for streetscape furnishings,
19 paving materials, stormwater channels, and
20 perimeter security so that any new features
21 would be compatible with the avenue's historic
22 character and character-defining features. This
23 collaboration would ensure that future physical
24 security components would result in indirect,
25 localized, long-term, negligible to minor, adverse
26 impacts to historic structures or the cultural
27 landscape.

28 Plans for the public/private management entity
29 to develop a unified paving approach along both
30 sides of Pennsylvania Avenue would be guided
31 by design guidelines for the avenue to ensure
32 compatibility with cultural resources. As a result,
33 any future changes in the paving would result in
34 a direct, localized, long-term, negligible to
35 minor, adverse impact to historic structures and
36 cultural landscapes in the corridor under the
37 preferred alternative.

38 **Visitor Information, Education, and Enjoy-**
39 **ment.** Pennsylvania Avenue National Historic
40 Site's historic character as a grand promenade
41 and its important historic vistas would continue
42 to be emphasized through interpretation and
43 improved wayfinding. Interpretation would
44 include the visual and physical design goals set
45 for the avenue, identification of historic build-
46 ings, and clarification between the area that
47 encompasses the designated Pennsylvania
48 Avenue National Historic Site and the larger
49 historic district, which encompasses areas
50 adjacent to the avenue's corridor. These

51 educational activities would foster an increased
52 awareness in cultural resources and could
53 encourage visitor etiquette and a respect for the
54 physical condition of historic structures and the
55 Pennsylvania Avenue cultural landscape. Al-
56 though the impact would be subtle, these
57 activities could result in a beneficial impact to
58 historic structures and historic districts, and to
59 the cultural landscape.

60 Interpretation and education under the pre-
61 ferred alternative would use technology and
62 would emphasize Pershing Park as the World
63 War I memorial in the capital city. These efforts
64 would result in a local and regional, long-term,
65 beneficial impact to historic structures and
66 cultural landscapes. Interpretive signs would be
67 small compared to the large-scale of the building
68 façades and the broad width of Pennsylvania
69 Avenue and its sidewalks. Thus, the introduction
70 of new interpretive wayside structures would be
71 an indirect, site-specific, long-term, negligible,
72 adverse impact to the historic setting, feeling, or
73 association of historic structures and cultural
74 landscapes.

75 Park managers would continue to discourage
76 skateboarding through education and law en-
77 forcement and would maintain "no skate-
78 boarding" signs. In addition, the National Park
79 Service would attach stop devices to many
80 historic features, such as walls. These efforts,
81 particularly stop devices, would result in
82 indirect, site-specific, long-term, negligible,
83 adverse impacts to historic structures under the
84 preferred alternative. There would be no in-
85 direct or direct adverse impacts to the Penn-
86 sylvania Avenue cultural landscape or historic
87 structures.

88 **Visitor Facilities and Services.** The public/pr-
89 ivate management entity would coordinate per-
90 mitting and commercial opportunities along the
91 avenue, including additional sidewalk cafés and
92 Capital Bikeshare stations. Transferring this
93 responsibility would have no direct or indirect
94 impacts on historic structures or the cultural
95 landscape.

96 **Health and Safety.** The National Park Service
97 would encourage the District of Columbia to
98 provide separate trash containers designated for
99 dog waste, as well as encourage adjacent prop-
100 erty owners to provide their own areas for dogs.

These actions would negligibly impact historic structures or the cultural landscape.

Actions for Specific Areas

General Meade Memorial. Under the preferred alternative the National Park Service in conjunction with the public/private management entity would consider a future transfer of the General Meade Memorial to the District of Columbia. If found to be desirable, this transfer would be conducted using an agreement to ensure that the property would be managed by the District in a manner consistent with the National Historic Preservation Act and the future preservation of historic properties near this site. The General Meade Memorial would be maintained and preserved in its current condition while collaborative ways to minimize skateboarding at the site in order to prevent physical damage to historic structures would be developed with the city, in accordance with the National Historic Preservation Act. There would be no impacts from transferring the memorial to the District of Columbia, and installing skateboarding deterrents around the memorial would have a negligible impact. Stopping skateboarding damage would have site-specific, long-term, beneficial impacts.

John Marshall Park. The National Park Service would continue to manage John Marshall Park and would support rehabilitation efforts by a park friends group. Because John Marshall Park and its components are noncontributing features of Pennsylvania Avenue National Historic Site, rehabilitation activities would not adversely impact the setting, feeling, or association of historic structures.

The National Park Service would authorize food carts and freestanding, automated public restrooms in this area under the preferred alternative. The design of these small structures would be compatible with the historic setting of the adjacent historic structures to keep adverse impacts to a minimum. The addition of these small structures would result in localized, long-term, negligible to minor, adverse impacts to historic structures.

Mellon Fountain. Under the preferred alternative the National Park Service would consider transferring ownership of the Andrew W. Mel-

lon Memorial Fountain at 5th and Pennsylvania Avenue to the National Gallery of Art. Since the National Gallery is a federal agency, it would continue to manage the Mellon Fountain in compliance with the National Historic Preservation Act. Therefore, this transfer would result in no impact to historic structures. (The small Pei-designed triangular property at 5th and Pennsylvania was transferred in to the gallery as of January 15, 2013.)

Indiana Plaza. At Indiana Plaza the preferred alternative would add design features to discourage skateboarding and reduce the damage it causes. The addition of automated restroom structures would also be considered. The design of these small structures would be compatible with the plaza's setting. As a result, impacts would be indirect, localized, long-term, and adverse, but they would be negligible to minor in intensity.

U.S. Navy Memorial. The National Park Service would retain management of the U.S. Navy Memorial and would improve its landscape features, but adjacent sidewalks would be transferred to the District of Columbia. This transfer would involve an agreement to ensure that the District would manage the sidewalks in a manner consistent with the National Historic Preservation Act to ensure the future preservation of nearby historic properties. Thus, this transfer would result in no impact to historic structures.

National Archives Frontage. The National Park Service would retain management of the Franklin Delano Roosevelt Memorial and adjacent plantings, but would consider transferring the plaza space north of the building to the National Archives and Records Administration. This transfer of historic property would have no impact to historic structures or cultural landscapes. The sidewalk area would be transferred to the District of Columbia, which would involve an agreement to ensure that the District would manage the sidewalks in compliance with the National Historic Preservation Act.

Freedom Plaza. Under the preferred alternative Freedom Plaza would be redesigned in a sustainable manner as a future site for a nationally significant memorial. The design would be in accordance with the NCPC *Memorials and*

1 *Museums Master Plan*. Any design would involve
2 protecting Pennsylvania Avenue's historic vistas
3 from this site and would negligibly affect views
4 to and from adjacent historic structures.

5 The National Park Service would consider trans-
6 ferring Freedom Plaza to the District of Colum-
7 bia, which would involve an agreement between
8 the National Park Service and the District to
9 ensure that the plaza would be managed in
10 compliance with the National Historic Preser-
11 vation Act. As a result, there would be no impact
12 to historic structures or cultural landscapes.

13 The equestrian statue of Casimir Pulaski (a con-
14 tributing feature of the district) could be moved
15 if necessary. The statue is in an obscure location
16 in the northeast corner of the plaza. Since this
17 contributing statue has been in its current loca-
18 tion since 1910, the adverse impact of a move
19 would be direct, localized, and long-term to
20 permanent. If moved, park managers would
21 work with consulting agencies to diminish
22 adverse impacts caused by its relocation and the
23 loss of the statue's context and setting, which
24 would keep the intensity of the adverse impact
25 in the minor range, such that the statue could
26 continue to be a contributing element of the
27 historic district.

28 *Pershing Park*. Under the preferred alternative
29 proposed actions to redesign Pershing Park
30 would involve providing visual access to the site
31 and replacing existing picnic tables. New or
32 rehabilitated structures would be small in scale
33 and their design, size, and form would be com-
34 patible with PADC goals and new design guide-
35 lines. Any impacts to historic structures in terms
36 of their historic setting along Pennsylvania
37 Avenue would be indirect, site-specific, long-
38 term, and range from negligible to minor in
39 intensity.

40 *Summary*

41 Overall impacts on historic structures and cul-
42 tural landscapes under the preferred alternative
43 would be direct and indirect, site-specific to
44 localized, long-term to permanent in duration,
45 negligible to minor in intensity, and adverse as
46 well as beneficial.

47 **Cumulative Impacts**

48 The impacts of past, present, and reasonably
49 foreseeable actions on Pennsylvania Avenue
50 National Historic Site would be the same as
51 described under the no-action alternative and
52 would be localized to national, long-term to
53 permanent, and beneficial. The impacts of
54 actions under the preferred alternative would be
55 direct and indirect, site-specific to localized,
56 long-term, negligible to minor, and adverse as
57 well as beneficial. The preferred alternative
58 would have little effect on cumulative impacts.

59 **Conclusion**

60 Impacts on historic structures under the pre-
61 ferred alternative would be direct and indirect,
62 site-specific to localized, long-term to perma-
63 nent, negligible to minor, and adverse, as well as
64 beneficial. The overall impacts of past, present,
65 and reasonably foreseeable actions added to
66 those of preferred alternative would result in
67 localized to national, long-term to permanent,
68 beneficial cumulative impacts. The impacts asso-
69 ciated with the preferred alternative would be a
70 small component of the cumulative impacts.

71 **NHPA Section 106 Summary**

72 After applying the Advisory Council on Historic
73 Preservation's criteria of adverse effects (36 CFR
74 800.5), the National Park Service concludes that
75 implementation of the preferred alternative
76 would have no adverse effects on historic struc-
77 tures or cultural landscapes. Further consulta-
78 tion would be required to make a final determi-
79 nation of effect on these resources and identify
80 appropriate mitigation measures.

81 **Impacts of Alternative A**

82 ***Direct and Indirect Impacts***

83 *General Actions*

84 *Management and Jurisdiction*. Under alterna-
85 tive A the National Park Service, the General
86 Services Administration, and the National
87 Capital Planning Commission would continue to
88 implement the goals and objectives of the 1974
89 *Pennsylvania Avenue Plan* and to comply with
90 the federal Commemorative Works Act. The
91 National Park Service would continue to man-
92 age the sidewalks and park areas, while the

District of Columbia would continue to manage the roadway. Street and community activities would continue to be accommodated in cooperation with the District of Columbia. The National Park Service would also continue to use the historic leasing program to allow commercial services in sidewalk areas not under easements. Continuing these management activities would have no impacts on cultural resources under alternative A.

Special Events and Demonstrations. Pennsylvania Avenue would continue to be used as a corridor for Inaugural Parades and other ceremonial functions. First Amendment demonstrations would continue to be permitted in accordance with federal regulations (36 CFR 7.96(g)(1)). Public visitor use during demonstrations would result in direct, site-specific, permanent, adverse impacts to the historic buildings and districts in the form of wear and tear to structures, but the intensity of such effects would be negligible to minor.

Access and Circulation. In cooperation with the District of Columbia, the National Park Service would improve pedestrian orientation within the national historic site by using maps and better-marked crosswalks. The National Park Service would also provide an NPS ranger contact information station and mobile carts with brochures near high-use pedestrian routes. Access to public transportation would continue without impacts to historic structures or the cultural landscape.

Urban Design Character. Alternative A includes adjustments to the physical design and furnishings of certain areas to encourage visitor use and gathering points for visitors. Increased visitation could cause a slight increase in the wear and tear of these resources. This would result in direct, site-specific, permanent, adverse impacts to the setting of historic structures and the cultural landscape, but the intensity of such effects would be negligible to minor.

Because the National Park Service would retain management of Pennsylvania Avenue National Historic Site, the avenue's historic character as a grand promenade and its important historic vistas would continue to be preserved and protected under alternative A. Streetscape elements, such as lighting, trees, pavers, and street furni-

ture, would be maintained to enhance the historic vistas, memorials, and monuments. New lighting plans would not detract from the prominence of the U.S. Capitol dome or other important federal landmarks. The National Park Service would continue its responsibility of preserving the avenue's monuments and memorials. The unified design guidelines that would be developed under alternative A would ensure that furnishings would be compatible with the historic setting and character-defining features of historic structures and the cultural landscape. As a result, new furnishings would result in localized, long-term, negligible, adverse impacts on cultural resources.

Under alternative A park managers would work with others to establish a unified design for perimeter security that would be compatible with the historic character and character-defining features and would have negligible impacts. The inclusion of small devices to stop skateboarding would protect historic structures, such as plazas and low walls where illegal skateboarding occurs. Limiting the addition of new facilities and ensuring the compatible design of any future facilities would ensure the protection of historic buildings, districts, memorials, and monuments. These actions would ensure that any potential adverse impacts to cultural resources would be indirect, site-specific, long-term, and negligible to minor.

Although the avenue's existing storm drain openings, street furnishings, curb and sidewalk paving, and drainage systems are not historic features and do not contribute to the cultural landscape, current plans to develop sustainable rainwater drainage would use compatible designs and materials to avoid impacting other historic structures or the overall landscape setting along Pennsylvania Avenue. Plans for the National Park Service to develop a unified paving approach along both sides of Pennsylvania Avenue would be consistent with new design guidelines for the avenue to ensure compatibility with cultural resources. Adverse impacts from stormwater improvements under alternative A would be indirect, localized, permanent, and negligible to minor in intensity.

Visitor Information, Education, and Enjoyment. Activities involving increased interpre-

tation and education under alternative A would indirectly benefit the historic setting of the structures identified in “The Affected Environment.” Such activities include the showcasing of the historic plans and views from Pennsylvania Avenue through interpretive signage within the corridor. Additional interpretation and identification of the historic buildings and historic districts using brochures or offsite educational materials, such as podcasts and other progressive media, would encourage visitor understanding and appreciation for the cultural resources on Pennsylvania Avenue. NPS-led walking tours to highlight the history and development of the federal city would increase in frequency, with tours offered during the day and at night.

Interpretation and education under alternative A would increase beyond a continuation of brochures and signs featuring themes such as America’s “Main Street” and the federal city within the corridor. Additionally, interpretive materials featuring new themes, such as World War I and General Pershing, and the 1791 city plan, would be introduced. All of these efforts would result in a local and regional long-term, beneficial impact to historic structures and cultural landscapes because these activities would foster greater awareness of cultural resources, which in turn could encourage visitor etiquette and a respect for the physical condition of historic structures and the cultural landscape. Although the impact would be subtle, these activities could result in indirect, localized, beneficial impacts to cultural resources. Interpretive signs would be small compared to the large-scale of building façades and the broad width of Pennsylvania Avenue and its sidewalks. Thus, new interpretive wayside structures would be an indirect, site-specific, long-term, negligible, adverse impact to the historic setting, feeling, or association of historic structures or cultural landscapes.

Visitor Facilities and Services. The National Park Service would seek congressional authority for a more flexible concessions approach using the “heritage corridor” concept or the National Trust for Historic Preservation’s Main Street model for economic revitalization in a historic setting. This approach would ensure that increased flexibility for concessioners would

negligibly impact the character and setting of the numerous historic buildings and districts along Pennsylvania Avenue.

Health and Safety. In key places along the avenue’s sidewalks, the National Park Service would provide separate containers designated for dog waste. The National Park Service would work with District of Columbia to encourage adjacent property owners to provide areas for dogs within their own developments. These actions to keep the avenue clean would have a negligible impact on cultural resources.

64 *Actions for Specific Areas*

George Meade Memorial. As described for the no-action alternative, the General Meade Memorial would be maintained and preserved in its current condition under alternative A. The National Park Service would seek ways to minimize skateboarding at the site in order to stop any physical damage this might cause to historic structures. Installing skateboarding deterrents around the memorial would have a negligible impact. Stopping skateboarding damage would have long-term, beneficial impacts. Adding plantings, trees, shade structures, or sidewalk amenities would be considered to enhance the visitor experience, with negligible impacts on cultural resources.

John Marshall Park. The National Park Service would support the rehabilitation of John Marshall Park by a friends group. The park and its components are noncontributing to Pennsylvania Avenue National Historic Site; therefore, the National Park Service’s support of these activities would pose no impacts to historic structures. Additionally, these rehabilitation efforts would not adversely impact the setting, feeling, or association of nearby historic structures.

Mellon Fountain. Landscape improvements, including better visibility of the Andrew W. Mellon Memorial Fountain (a contributing feature) at the National Gallery of Art, would enhance the setting of historic structures, with a beneficial impact to historic structures. (As described under the no-action alternative, the small triangular property at 5th and Pennsylvania was transferred to the gallery in 2012.)

1 **Indiana Plaza.** At Indiana Plaza seasonal plant-
 2 ings and design features would be added under
 3 alternative A to discourage skateboarding and to
 4 reduce the damage it causes. These design fea-
 5 tures would be compatible with the historic
 6 setting of the adjacent historic structures, so
 7 adverse impacts from these activities would be
 8 site-specific, long-term, and negligible to minor.

9 **U.S. Navy Memorial.** Alternative A includes
 10 only small maintenance projects at the U.S. Navy
 11 Memorial (a contributing feature). Therefore,
 12 no direct or indirect impacts to historic struc-
 13 tures would occur.

14 **National Archives Frontage.** The National Park
 15 Service would work with the National Archives
 16 and Records Administration to restore the
 17 fountains next to the National Archives north
 18 entrance (a contributing feature) and to redesign
 19 this area as a neighborhood park. These actions
 20 would rehabilitate elements along the avenue
 21 that have fallen into disrepair. This rehabilitation
 22 work would result in a beneficial impact to the
 23 fountains and the historic setting of Pennsyl-
 24 vania Avenue.

25 **Freedom Plaza.** Activities associated with the
 26 redesign of Freedom Plaza (a noncontributing
 27 feature) would involve protecting Pennsylvania
 28 Avenue's historic vistas from this site and would
 29 negligibly affect views to and from adjacent his-
 30 toric structures. The redesign would be com-
 31 patible with a future nationally significant
 32 memorial. The equestrian statue of Casimir
 33 Pulaski (a contributing feature) could be moved
 34 if necessary. Since this contributing statue has
 35 been in its current location since 1910, the ad-
 36 verse impact of a move would be direct, local-
 37 ized, and long-term to permanent. If moved,
 38 park managers would work with consulting
 39 agencies to diminish adverse impacts caused by
 40 its relocation and the loss of the statue's context
 41 and setting, which would keep the intensity of
 42 the adverse impact in the minor range, such that
 43 the statue could continue to be a contributing
 44 element of the historic district.

45 **Pershing Park** — Proposed actions to improve
 46 Pershing Park (a noncontributing site) would be
 47 limited to repairs to the landscape, waterfall, and
 48 pool, and replacing the park's concrete picnic
 49 tables. These activities would be consistent with
 50 PADC goals and new design guidelines to ensure

51 compatibility with the avenue's historic struc-
 52 tures. Any impacts to historic structures in terms
 53 of their historic setting along Pennsylvania
 54 Avenue would be indirect, site-specific, and
 55 negligible in intensity.

56 **Summary**

57 Overall the long-term impacts on historic struc-
 58 tures under alternative A would be site-specific
 59 and localized, long-term to permanent, negligi-
 60 ble to minor, and adverse as well as beneficial.

61 **Cumulative Impacts**

62 The impacts of past, present, and reasonably
 63 foreseeable actions on Pennsylvania Avenue
 64 National Historic Site would be the same as
 65 described under the no-action alternative and
 66 would be localized to national, long-term to
 67 permanent, and beneficial. The impacts of
 68 actions under alternative A would be site-
 69 specific to localized, long-term to permanent,
 70 negligible to minor, and adverse. Alternative A
 71 would have little effect on cumulative impacts.

72 **Conclusion**

73 Impacts on historic structures under alternative
 74 A would be site-specific and localized, long-term
 75 to permanent, negligible to minor, and adverse.
 76 The overall impacts of past, present, and rea-
 77 sonably foreseeable actions added to those of
 78 alternative A would result in localized to na-
 79 tional, long-term to permanent, beneficial
 80 cumulative impacts. The impacts associated with
 81 alternative A would be a small component of
 82 cumulative impacts.

83 **NHPA Section 106 Summary**

84 After applying the Advisory Council on Historic
 85 Preservation's criteria of adverse effects (36 CFR
 86 800.5), the National Park Service concludes that
 87 implementation of alternative A would have no
 88 adverse effect on historic structures or cultural
 89 landscapes. Further consultation would be
 90 required to make a final determination of effect
 91 on these resources and to identify appropriate
 92 mitigation measures.

1 **Impacts of Alternative B**

2 **Direct and Indirect Impacts**

3 **General Actions**

4 **Management and Jurisdiction.** Under alterna-
 5 tive B the National Park Service, the General
 6 Services Administration, and the National Capi-
 7 tal Planning Commission would continue to
 8 implement the goals and objectives of the 1974
 9 *Pennsylvania Avenue Plan* and to comply with
 10 the federal Commemorative Works Act, while
 11 enlivening the avenue with the addition of public
 12 art displays, fairs, and other types of urban activ-
 13 ities.

14 The National Park Service would continue plan-
 15 ning responsibilities jointly with the National
 16 Capital Planning Commission and the General
 17 Services Administration, while supporting en-
 18 hanced partnerships with some of the cultural
 19 resources along the corridor. Under alternative
 20 B the National Park Service would consider
 21 transferring the jurisdiction of certain areas and
 22 monuments along Pennsylvania Avenue to other
 23 agencies for the purpose of better achieving the
 24 goals of the *Pennsylvania Avenue Plan* (see
 25 “Actions for Specific Areas” below). These
 26 transfers would have no impact historic struc-
 27 tures or the cultural landscape because the
 28 resources would continue to be managed in
 29 compliance with the National Historic Preser-
 30 vation Act, as all federal agencies are required to
 31 protect and preserve cultural resources under
 32 this law. Therefore, the potential transfer of the
 33 jurisdiction of historic properties, such as monu-
 34 ments or memorials, to another federal agency
 35 would have no impact on these historic struc-
 36 tures or to the settings and features of the
 37 Pennsylvania Avenue cultural landscape.

38 Jurisdiction of the sidewalks and certain lawn
 39 areas would be transferred from the National
 40 Park Service to the District of Columbia under
 41 alternative B. Because these areas would be
 42 transferred out of federal jurisdiction, the Dis-
 43 trict would not be legally required to comply
 44 with the National Historic Preservation Act. In
 45 this case the National Park Service and partner
 46 agencies would use a transfer agreement that
 47 would ensure that all historic structures would
 48 continue to be protected and preserved in accor-
 49 dance with the National Historic Preservation

50 Act. The agreement would ensure that the Dis-
 51 trict’s management of the sidewalks and associ-
 52 ated areas would also continue to meet the goals
 53 of the NCPC *Museums and Memorials Master*
 54 *Plan* and the *Monumental Core Framework Plan*.
 55 This procedure would ensure that there would
 56 be no impacts to historic structures or the Penn-
 57 sylvania Avenue cultural landscape under
 58 alternative B. The District of Columbia would
 59 continue to manage the Pennsylvania Avenue
 60 roadway.

61 **Special Events and Demonstrations.** The Na-
 62 tional Park Service would continue to accommo-
 63 date more visitor and community activities in
 64 cooperation with the District of Columbia for
 65 areas remaining under NPS management. The
 66 addition of permanent or temporary art, sea-
 67 sonal banners, and other exhibitions in the
 68 corridor, as well as an increase in visitor activity,
 69 would result in direct, site-specific, permanent
 70 adverse impacts to the historic buildings and
 71 districts in the form of wear and tear to struc-
 72 tures, but the intensity of such effects would be
 73 negligible to minor.

74 For sites remaining under NPS jurisdiction, First
 75 Amendment demonstrations and inaugural
 76 activities would continue to be permitted in
 77 accordance with federal regulations (36 CFR
 78 7.96(g)(1)). The District of Columbia would be
 79 responsible for permitting activities on the
 80 sidewalks and other areas, including inaugural
 81 activities, under its jurisdiction following the
 82 transfer of these properties. Visitor use during
 83 demonstrations would result in direct, site-spe-
 84 cific, permanent, adverse impacts to historic
 85 buildings and districts in the form of wear and
 86 tear to structures, but the intensity of such
 87 impacts would be negligible to minor.

88 **Access and Circulation.** Improvements to pe-
 89 destrian orientation within the Pennsylvania
 90 Avenue corridor by the District of Columbia
 91 would be encouraged under alternative B and
 92 would include better-marked crosswalks, along
 93 with improved traffic islands, traffic lights, and
 94 other crosswalk-related signage. Under alterna-
 95 tive B the National Park Service would also
 96 encourage the city to install additional Capital
 97 Bikeshare stations. These changes would be
 98 small in scale and would follow the compatible
 99 design standards set for the avenue. Therefore

these actions would result in direct, site-specific, long-term, adverse impacts to the setting of historic structures and the Pennsylvania Avenue cultural landscape, but the intensity of such impacts would be negligible to minor.

Urban Design Character. Under alternative B the National Park Service would support the District in developing a unified design palette and parameters for streetscape furnishings, paving materials, stormwater channels, and perimeter security so that any new features would be compatible with the avenue's historic character and character-defining features. This collaboration would ensure that future physical security components would result in indirect, localized, long-term, negligible to minor, adverse impacts to historic structures or the historic character of the cultural landscape.

The National Park Service would work with the District of Columbia to develop media distribution boxes and new lighting that would not detract from the prominence of the U.S. Capitol dome or other important federal landmarks, and to be compatible with the historic corridor. These actions would have site-specific, long-term, negligible, adverse impacts to historic structures, and to the contributing features of the Pennsylvania Avenue cultural landscape.

Visitor Information, Education, and Enjoyment. Interpretation and education under alternative B would include continuing to participate in the collaborative development of a "Federal Cultural Walk," a guided interpretive event highlighting the history and development of the federal city. Present interpretive signs within the corridor would be maintained. Interpretation would include the visual and physical design goals set for the avenue, identification of historic buildings, and clarification between the area that encompasses the designated Pennsylvania Avenue National Historic Site and the larger historic district, which encompasses areas adjacent to the avenue's corridor. These educational activities would foster an increased awareness in cultural resources and could encourage visitor etiquette and a respect for the physical condition of historic structures and the Pennsylvania Avenue cultural landscape. Although the impact would be subtle, these activities could result in a beneficial impact to

historic structures and historic districts. These actions would negligibly impact contributing cultural landscape features.

Park managers would continue to use and maintain "no skateboarding" signs to discourage skateboarding in the plazas and along low walls where illegal skateboarding occurs. This would result in indirect, site-specific, long-term, negligible, adverse impacts to historic structures under alternative B; there would be no indirect or direct adverse impacts to the Pennsylvania Avenue cultural landscape.

Visitor Facilities and Services. The National Park Service would transfer management of the historic leasing program to the District of Columbia to regulate commercial opportunities along the avenue, including additional sidewalk cafés and Capital Bikeshare stations. Transferring this responsibility would have no direct or indirect impacts to historic structures or the cultural landscape under alternative B.

Health and Safety. The National Park Service would encourage the District of Columbia to provide separate trash containers designated for dog waste, as well as encourage adjacent property owners to provide their own areas for dogs. These actions would negligibly impact historic structures and the cultural landscape.

Actions for Specific Areas

General Meade Memorial. The General Meade Memorial would be maintained and preserved in its current condition. Ways to minimize skateboarding at the site in order to prevent physical damage to historic structures would be developed with the city. Installing skateboarding deterrents around the memorial would have a negligible impact, but stopping skateboarding damage would have site-specific, long-term, beneficial impacts. Potentially adding plantings, trees, shade structures, or sidewalk amenities, which would be done in accordance with the National Historic Preservation Act, would have negligible impacts on cultural resources.

Under alternative B the National Park Service would also consider a future transfer of this area to the District of Columbia. This transfer would be conducted using an agreement that would ensure that the property would be managed by

the District in a manner consistent with the National Historic Preservation Act to ensure the future preservation of historic properties near this site. There would be no impacts from transferring the memorial to the District of Columbia,

John Marshall Park. The National Park Service would continue to manage John Marshall Park and would support rehabilitation efforts by a park friends group. Because John Marshall Park and its components are noncontributing features of Pennsylvania Avenue National Historic Site, rehabilitation activities would not adversely impact the setting, feeling, or association of historic structures.

The National Park Service would authorize food carts and freestanding, automated public restrooms in this area under alternative B. The design of these small structures would be compatible with the historic setting of the adjacent historic structures to keep adverse effects to a minimum. The addition of these small structures would result in localized, long-term, negligible to minor, adverse impacts to historic structures.

Mellon Fountain. Ownership of the Andrew W. Mellon Memorial Fountain at 5th and Pennsylvania Avenue would be transferred to the National Gallery of Art. Since the National Gallery is a federal agency, it would continue to manage this site in compliance with the National Historic Preservation Act. Therefore, this transfer would not result in an adverse impact to historic structures under alternative B. (As described under the no-action alternative, the small Pei-designed triangle at 5th and Pennsylvania was transferred to the gallery as of January 15, 2013.)

Indiana Plaza. At Indiana Plaza alternative B would add seasonal plantings and design features to discourage skateboarding and reduce the damage it causes. These design features would be compatible with the historic setting of the plaza in order to minimize any adverse impacts. The addition of automated restroom structures would be considered under alternative B. The design of these small structures would be compatible with the plaza's setting. As result, impacts would be indirect, localized, long-term, and adverse, but negligible to minor in intensity.

U.S. Navy Memorial. The National Park Service would retain management of the U.S. Navy Memorial, but adjacent sidewalks would be transferred to the District of Columbia. This transfer would involve an agreement to ensure that the District would manage the sidewalks in a manner consistent with the National Historic Preservation Act to ensure the future preservation of nearby historic properties. Thus, this transfer would result in no adverse impact to historic structures.

National Archives Frontage. The National Park Service would retain management of the Franklin Delano Roosevelt Memorial and adjacent plantings, but would consider transferring the plaza space north of the building to the National Archives and Records Administration, with the exception of the sidewalk area, which would be transferred to the District of Columbia. This transfer would involve an agreement to ensure that the sidewalks would be managed in compliance with the National Historic Preservation Act. This transfer of historic property, as well the transfer to the National Archives and Records Administration Service, would have no adverse impact to historic structures.

Freedom Plaza. The National Park Service would consider transferring Freedom Plaza to the District of Columbia, which would involve an agreement between the National Park Service and the District to ensure that the plaza would be managed in compliance with the National Historic Preservation Act and designed in accordance with the *Memorials and Museums Master Plan*. In the interim the National Park Service would add temporary shade structures and other hospitality features. The design of the features and shade structures would be compatible with Pennsylvania Avenue's historic setting and would not introduce obtrusive structures into the historic viewshed along the avenue. Therefore, these actions to add small-scale features to Freedom Plaza would result in localized, temporary to long-term, negligible to minor, adverse effects under alternative B.

Pershing Park. Under alternative B proposed actions to redesign Pershing Park would involve adding an indoor/outdoor garden pavilion, small kiosks, and an amphitheater. These activities would be designed to enhance the historic vistas

along Pennsylvania Avenue. New structures would be small in scale and their design, size, and form would be consistent with PADC goals and new design guidelines. Any adverse impacts to historic structures in terms of their historic setting along Pennsylvania Avenue would be indirect, site-specific, long-term, and negligible to minor in intensity.

Summary

Overall impacts on historic structures and cultural landscapes under alternative B would be site-specific and localized, long-term to permanent, negligible to minor in intensity, and adverse, as well as beneficial.

Cumulative Impacts

The impacts of past, present, and reasonably foreseeable actions on Pennsylvania Avenue National Historic Site would be the same as described under the no-action alternative and would be localized to national, long-term to permanent, and beneficial. The impacts of actions under alternative B would be site-specific to localized, long-term to permanent, negligible to minor, and adverse. Alternative B would have little effect on cumulative impacts.

Conclusion

Impacts on historic structures under alternative B would be site-specific and localized, long-term to permanent, negligible to minor, and adverse, as well as beneficial. The overall impacts of past, present, and reasonably foreseeable actions added to those of alternative B would result in localized to national, long-term to permanent, beneficial, cumulative impacts. The impacts associated with alternative B would be a small component of the cumulative impacts.

NHPA Section 106 Summary

After applying the Advisory Council on Historic Preservation's criteria of adverse effects (36 CFR 800.5), the National Park Service concludes that implementation of alternative B would have no adverse effects on historic structures or cultural landscapes. Further consultation would be required to make a final determination of effect on these resources and identify appropriate mitigation measures.

IMPACTS ON DEMONSTRATIONS, NATIONAL CELEBRATIONS, AND SPECIAL EVENTS

Methodology for Analyzing Impacts

The analysis looks at how the alternatives would affect demonstrations, national celebrations, and special events in the following areas:

- *Impacts on First Amendment demonstrations* — This topic analyzes the beneficial and adverse impacts of demonstrations on public use of sidewalks, roads, and other areas within the Pennsylvania Avenue study area.
- *Impacts on Inaugural Parades* — This topic analyzes the beneficial or adverse impacts of alternatives on the quadrennial parade, a national celebration.
- *Impacts on permitted special events and commercial filming and photography* — This impact topic considers how alternatives beneficially or adversely affect event managers or participants in permitted activities (national celebrations and special events) and commercial filming and photography.

Impact Intensity Levels

The following impact thresholds were defined for demonstrations, national celebrations, and special events:

- *Negligible* — The impact would not be detectable or would be barely detectable to First Amendment demonstrators, most special events participants and organizers, or Inaugural Parade organizers and participants. There would be no discernible effect on the sustainability of park resources or the ability of the National Park Service to support demonstrations, national celebrations, special events, filming, or photography.
- *Minor* — The impact would be detectable to some demonstrators, as well as some event participants or organizers. It would have a limited effect, either adversely or beneficially, on the sustainability of park