Franklin Park
National Mall and Memorial Parks
Washington, D.C.

U.S. Department of the Interior
National Park Service

FRANKLIN PARK VISION AND TRANSFORMATION

ENVIRONMENTAL ASSESSMENT

DECEMBER 2014

FRANKLIN PARK
VISION AND TRANSFORMATION PLAN

NATIONAL PARK SERVICE

DOWN TOWN DC

NATIONAL PARK SERVICE
U.S. DEPARTMENT OF THE INTERIOR

NATIONAL MALL AND MEMORIAL PARKS
WASHINGTON, D.C.

Franklin Park Vision and Transformation Plan

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ENVIRONMENTAL ASSESSMENT

December 2014

PROJECT SUMMARY

The National Park Service (NPS), in cooperation with the National Capital Planning Commission and in collaboration with the District of Columbia (the District) and the DowntownDC Business Improvement District (DowntownDC BID), has prepared this Environmental Assessment (EA) to evaluate a range of alternatives for the revitalization of Franklin Park in downtown Washington, D.C.

Franklin Park occupies an entire city block of about 5 acres in downtown Washington, D.C. The project area is situated in a residential and business district three blocks northeast of the White House. The park features a central fountain plaza and a historically significant statue commemorating Commodore John Barry. Rows of trees surround the park on all sides and are spaced throughout the park. Many of the park's features are in disrepair, and the level and quality of visitor experience is not what is desired at such a large and centrally located urban park. As a result, the NPS and partner team are developing a plan and designs for transforming Franklin Park into a premier, active, flexible, and sustainable historic urban park connected to its community.

This EA presents a range of alternatives to enhance the historic and urban qualities of the park while transforming it into an active, flexible, and sustainable park.

Alternative 3, the Edge, which would rehabilitate and enhance the park while retaining much of the historical spatial symmetry, is the NPS's preferred alternative. Implementation of this alternative would result in long-term minor adverse impacts to soils as a result of increased visitation and foot traffic and reduced soil productivity where new hardscape would be placed. There would also be long-term minor adverse impacts to vegetation as a result of the loss of turf and tree removal. Long-term beneficial impacts to visitor use and experience would result from increased visitor amenities and improved aesthetics. There would be long-term moderate adverse impacts to cultural resources because the integrity of several landscape features would be diminished, and the overall integrity of the Franklin Park cultural landscape would be lessened. Improved perceptions of safety and visibility and improved access would result in long-term beneficial impacts to public safety and accessibility. If an agreement with park partners was reached, there would be long-term beneficial impacts to park management and operations. However, if an agreement was not reached, there would be long-term negligible to minor adverse impacts to park management and operations due to increased maintenance and staffing needs.

Note to Reviewers and Respondents:

To comment on this EA, you may mail comments or submit them online within 30 days of the publication of this EA at http:// parkplanning.nps.gov/FranklinPark and follow the appropriate links. Please be aware that your comments and personally identifying information may be made publicly available at any time. While you may request that the NPS withhold your personal information, we cannot guarantee that we will be able to do so. Please mail comments to:

Superintendent
Attn: Franklin Park Vision and Transformation Plan
National Park Service
National Mall and Memorial Parks
900 Ohio Drive, SW
Washington, D.C. 20024

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TABLE OF CONTENTS

TABLES

FIGURES

CHAPTER 1: PURPOSE AND NEED

Introduction

The National Park Service (NPS), in cooperation with the National Capital Planning Commission (NCPC) and in collaboration with the District of Columbia (the District) and the DowntownDC Business Improvement District (DowntownDC BID), prepared this environmental assessment (EA) to evaluate a range of alternatives for the revitalization of Franklin Park in downtown Washington, D.C., bordered by K Street NW on the north, 13th Street NW on the east, I Street NW on the south, and 14th Street NW on the west, administered by the NPS within the National Mall and Memorial Parks unit.

An EA analyzes the proposed action and alternatives and their impacts on the environment. This EA has been prepared in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), and implementing regulations, 40 CFR 1500–1508, and NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision Making* and Handbook (NPS 2001a). Compliance with section 106 of the National Historic Preservation Act (NHPA) of 1966 has been conducted in conjunction with the NEPA process.

Purpose of and Need for Action

The purpose of the proposed action is to revitalize Franklin Park in a manner that respects and enhances the historic and urban qualities of the park while transforming it into an active, flexible, and sustainable park that is connected to its community.

Currently, the park features are deteriorated, and essential services, such as adequate seating and programming, are lacking. In addition, opportunities exist for better connection to both the historic and current urban context. The current project is needed to address these deficiencies and revitalize the park so that it attracts and serves all visitors.

Project Area

Franklin Park occupies an entire city block of about 5 acres in downtown Washington, D.C. It is bordered by K Street NW on the north, 13th Street NW on the east, I Street NW on the south, and 14th Street NW to the west. The project area is situated in a residential and business district three blocks northeast of the White House. Franklin Park slopes gradually down from north to south and from northeast to southwest. The park features a central fountain plaza and a historically significant statue commemorating Commodore John Barry. Rows of trees surround the park on all sides and are spaced throughout the park. Elliptical pathways define the park's circulation system and pattern of open areas that are symmetrical on an east-west axis.

Figure 1.1 – Project Area

Several key features within the park are shown in Figures 1.2, 1.3, and 1.4. These features are described in further detail in "Chapter 3: Affected Environment" and more briefly as follows:

Figure 1.2 – Franklin Park Key Features.

THE FOUNTAIN AND CENTER PLAZA

Figure 1.3 – Fountain

The focal point of Franklin Park is an oval fountain with a paved flagstone plaza in the center of the park. The elliptical fountain is surrounded with a broad, simply molded sandstone coping. The fountain has two "French" jets, installed in the 1930s, and a central jet that was a later addition (1988).

The flagstone plaza has four curvilinear planting areas that are evenly spaced within the plaza around the fountain. These beds originally had three willow oak trees, but now only one bed has three trees while the other three beds have two trees each. These willow oaks create a visual boundary defining the plaza as a distinct space and provide shade to the central plaza. A low stone retaining wall runs along the northeast quadrant of the plaza due to the slope in this area.

The fountain (replacing a smaller circular fountain from the 1870s) and plaza were built in 1935 with the aid of a $75,000 grant from the Public Works Administration. The fountain was renovated in 1991.

THE BARRY STATUE

Figure 1.4 – The Barry Statue

At the mid-point on the west side of the park stands a statue commemorating the Revolutionary War hero, Naval Commodore John Barry (1914). This bronze statue stands on a tall marble pedestal ornamented with a female allegorical winged victory figure. The statue is placed in the center of a rectangular marble plaza facing 14th Street NW, raised a few steps above the level of the sidewalk. The low metal fencing on the eastern side of the fountain plaza provides a border from the rest of the park.

CIRCULATION AND SPATIAL LAYOUT

Franklin Park is surrounded on all sides by rows of trees that create a distinct visual and physical boundary for the park. Inside the park, there are three ellipses that define the circulation and create two large open lawn areas and one fountain area. The flagstone plaza in the middle is flanked by two large elliptical walks that enclose the lawns on the east and west side. The major walkways in the park include subsidiary paths leading to each of the park's four corners and to the midpoints of the longer north and south sides.

TREES

A focal point of Franklin Park is the plethora of mature trees planted throughout the park. Most of the trees within the park are large, deciduous trees, which provide a tree canopy over 74% of the park. The primary canopy species is willow oak with other major species including zelkovas, elms, sophoras, lindens, other oaks, and cedars. The plantings of these trees are placed with an informal framework lining the park boundaries, entrance walkways, and a few walkway intersections.

There are small clusters of evergreens located near each of the four corners of the park. These trees provide a distinct accent to the overall plant palette. In addition to the evergreens, there are numerous deciduous magnolias and crabapples that provide spring color.

Project Background

In 2011, the District and the DowntownDC BID met with the NPS to discuss opportunities for how to improve parks within the District, particularly in the downtown area, and to develop an improvement plan and partnership to improve parks. The partnership focused on Franklin Park, given its size, proximity to downtown, and the growing residential population nearby. By spring 2012, both the NPS and District had dedicated funds for fiscal year 2013 for initial design work and planning for Franklin Park. In summer 2012, the partners attended the City Parks Alliance conference, which provided inspiration for the partnership and planning actions. With the conference as inspiration, the partners began the planning effort in fall 2012 and created a shared vision for Franklin Park. By the summer of 2013, planning began in earnest.

Franklin Park Development History

Franklin Park originated in 1791, occupying an entire city block in downtown Washington, D.C., and is considered as a contributing feature to the "L'Enfant Plan of the City of Washington." The 1791 L'Enfant Plan did not single out the square now occupied by Franklin Park for any special use, however, and it was not among the fifteen squares Pierre Charles L'Enfant set aside for development by each of the states, nor was it located at a significant intersection within the street grid. It appears on the plan, and on early city plans produced over the next three decades, as merely a typical city square, numbered 249 (Reps 1991:37). The land was then set aside by Congress in 1832 to protect the fresh spring or springs on the site that were used to supply water to the White House, several blocks to the southwest, and other federal buildings. The park went through several redevelopments in 1868-1872, 1936, and in the mid-1970s.

Franklin Park's period of significance extends from 1867 to 1936. This period includes at least two distinct design phases, a Victorian Park and the sparser, clean design of the 1930s. Elements of the Victorian design were retained and influenced the 1936 work.

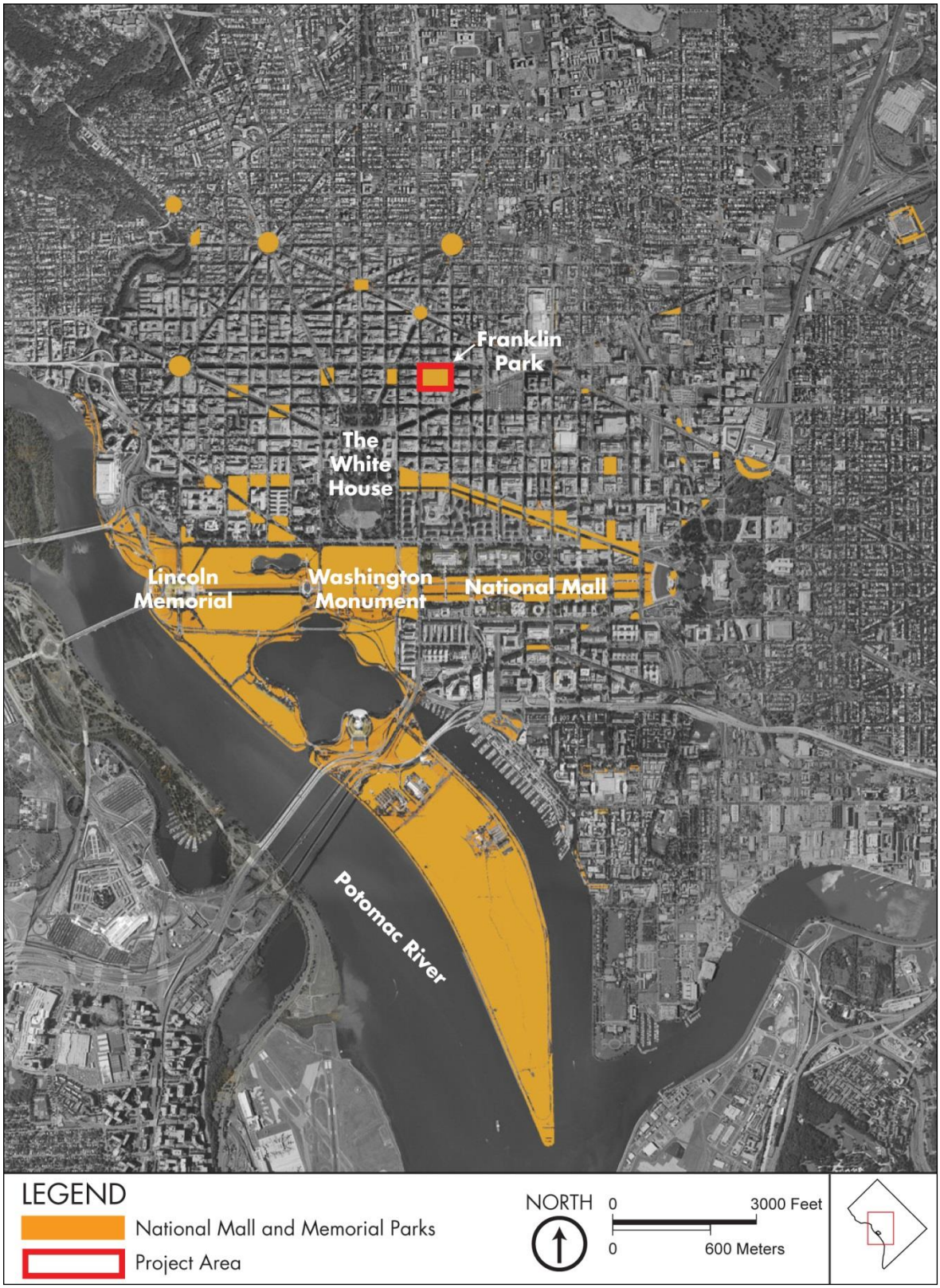
Over time, the vitality of Franklin Park has deteriorated, and as a result it has become less integrated into the residential and commercial area surrounding it. Today, action is needed to develop a plan and designs for transforming Franklin Park into an active, flexible, and sustainable historic urban park that is better connected to its community.

Table 1.1 presents notable milestones in the history of Franklin Park.

Table 1.1 – Park Background

1819	On March 3, 1819, Congress sets aside the land that makes up Franklin Park to protect the natural springs on the site that supplied water to the White House and other federal buildings in the area.
1862	Union troops camp in Franklin Park during the Civil War.
1866-1867	Landscape of the park begins by a public gardener. A small lodge is built, gravel walks are laid out, and a fountain bowl is placed near the center of the park.
1873-1875	The original fountain is installed. In 1875 the fountain bowl is enhanced with red granite coping imported from Scotland.
1886	The Victorian park features meandering paths with undulating topography, enclosed with a substantial iron fence.
1897	The springs are closed because of fears concerning their vulnerability and that of the White House drinking water to poisoning by Spanish sympathizers in the days leading up to the Spanish-American War.
1904	Concrete quarter-round curbing is placed around the perimeter of Franklin Park.
1908	A large concrete sandbox is built on the park's northeast side to accommodate the needs of the neighborhood children.
1913-1914	A major new planting for the east and west ends of the park is implemented. A new lodge with restrooms is built on the east side of the park, midway along the block near the sidewalk designed by the landscape architect George Burnap. The Commodore John Barry Statue is installed and dedicated in May 1914.
1933	Franklin Park is transferred to the jurisdiction of the National Park Service.
1935-1936	A 'spot plan' is done to determine necessary tree work. Rehabilitation of the park begins in the winter of 1936 under a WPA grant. Trees are removed and new trees and shrubs are planted; land is graded and topsoil is added; new walks are paved; and a new fountain replaces the old one.
1946	Planting plan developed. Y-shaped walks added
1974	NPS rehabilitates Franklin Park as part of the Bicentennial Downtown Parks program. Work includes resurfacing of all walks, replacement and repair of benches and trash receptacles, new and replacement plantings, and a new irrigation system. The lodge on the eastern side of the park is removed.
1990	In conjunction with the Franklin Square Association, NPS carries out rehabilitation work on the park.
2000	The hedge around the plaza is removed.
2003 - 2004	To create open, sunny lawns on the east and west ends, several trees dating from after the period of significance are removed. The Y-shaped walks and iron railings on the east side and some oaks, hollies, crabapples, and southern magnolia trees are also removed. Linden and elm trees are added along the southern edge of the park. Repairs are made to the walks and the stones of the plaza are replaced in-kind.
2013	The Franklin Park Vision and Transformation Plan begins.

Figure 1.5 – National Mall and Memorial Parks



Applicable Federal Laws and Regulations

The NPS is governed by laws, regulations, and management plans before, during, and following any management action considered under any National Environmental Policy Act (NEPA) analysis. The following are laws and regulations that are applicable to the proposed action.

NATIONAL ENVIRONMENTAL POLICY ACT, 1969, AS AMENDED

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

The NEPA is implemented through regulations of the Council on Environmental Quality (CEQ), effective 1978 (40 Code of Federal Regulation [CFR] §§1500–1508). The NPS has in turn adopted procedures to comply with NEPA and the CEQ regulations. These are contained in *Director's Order (DO) 12: Conservation Planning, Environmental Impact Analysis, and Decision-making* (2001), and its accompanying handbook.

NATIONAL HISTORIC PRESERVATION ACT, AS AMENDED THROUGH 2004 (16 U.S.C. 470)

The National Historic Preservation Act (NHPA) of 1966, as amended through 2004, protects buildings, sites, districts, structures, and objects that have significant scientific, historic, or cultural value. The NHPA established affirmative responsibilities of federal agencies to preserve historic and prehistoric resources. Effects on properties that are listed in or are eligible for the National Register of Historic Places (NRHP) must be taken into account in planning and operations. Any property that may qualify for listing in the NRHP must not be inadvertently transferred, sold, demolished, substantially altered, or allowed to deteriorate.

Section 106 of the NHPA, 16 USC 470 et seq., requires federal agencies to take into account the effects of their undertakings on historic properties either listed in or eligible to be listed in the NRHP. The historic preservation review process required by Section 106 is outlined in regulation 36 CFR §800, Protecting Historic Properties, issued by the Advisory Council on Historic Preservation (ACHP), an independent federal agency established by the NHPA in 1966 to promote the preservation, enhancement, and productive use of our nation's historic resources. The goal of the Section 106 review process is to seek ways to avoid, minimize, or mitigate any adverse effects to historic properties.

HISTORIC SITES ACT OF 1935

This act declares as national policy the preservation for public use of historic sites, buildings, objects, and properties of national significance. It authorizes the Secretary of the Interior and NPS Director to restore, reconstruct, rehabilitate, preserve, and maintain historic or prehistoric sites, buildings, objects, and properties of national historical or archeological significance.

NPS ORGANIC ACT

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

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

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

NATIONAL PARKS OMNIBUS MANAGEMENT ACT OF 1998

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

The NPOMA directs the NPS to obtain scientific and technical information for analysis. The NPS handbook for DO-12 states that if "such information cannot be obtained due to excessive cost or technical impossibility, the proposed alternative for decision will be modified to eliminate the action causing the unknown or uncertain impact, or other alternatives will be selected" (NPS 2001b).

AMERICANS WITH DISABILITIES AND ARCHITECTURAL BARRIERS ACT GUIDELINES

Pursuant to the Americans with Disabilities Act of 1990 (ADA) and the Architectural Barriers Act of 1968 (ABA), all public buildings, structures, and facilities must comply with specific requirements related to architectural standards, policies, practices, and procedures that accommodate people with hearing, vision, or other disability; and other access requirements. Public facilities and places must remove barriers in existing buildings and landscapes, as necessary and where appropriate. The NPS must comply with the ABA Accessibility Standard (ABAAS) as well as ADA standards for this project.

REDWOOD NATIONAL PARK ACT OF 1978, AS AMENDED

All national park system units are to be managed and protected as parks, whether established as a recreation area, historic site, or any other designation. This act states that the NPS must conduct its actions in a manner that will ensure no "derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress."

CODE OF FEDERAL REGULATIONS

36 CFR §1.5

36 CFR §1.5 sets closures and public use limits for NPS units. These regulations specify the designated areas within park units in the National Capital Region, including the project area, for specific visitor activities and emergency use restrictions.

36 CFR §7.96

36 CFR §7.96 sets forth guidelines to control special events and uses within NPS units including the National Mall. These regulations control site access, staging, risk management, comfort facilities, first aid, security, transportation, and cost recovery for the special events to minimize impacts to park resources and the public. Further, 36 CFR §7.96 specifies the location, timing, and size of special events in the National Capital Region NPS units, including the project area.

COMMEMORATIVE WORKS ACT OF 1986

The Commemorative Works Act provides guidance for the planning and design of projects within the monumental core of downtown Washington, D.C. Specifically, the intent of the legislation is to:

- preserve the integrity of the comprehensive design of the L'Enfant and McMillan plans for the nation's capital
- ensure the continued public use and enjoyment of open space in the District of Columbia and its environs, and encourage the location of commemorative works within the urban fabric of the District of Columbia
- preserve, protect, and maintain the limited amount of open space available to residents of, and visitors to, the nation's capital
- ensure future commemorative works in areas administered by the NPS and the Administrator of General Services in the District of Columbia and its environs

The Commemorative Works Act was amended in 2003 by Congress, which designated the cross axis of the National Mall and the north-south axis between the Jefferson Memorial and the White House to be a "substantially completed work of civic art" and prohibited new commemorative works in this area. Congress also directed the NPS to begin planning for the future of the National Mall to protect its character (NCPC 1986).

Executive Orders and Director's Orders

DIRECTOR'S ORDER 17: NATIONAL PARK SERVICE TOURISM

DO-17 promotes and supports sustainable, responsible, informed, and managed visitor use through cooperation and coordination with the tourism industry. This DO provides guidance to the NPS to balance budgetary needs with resource management practices to keep key visitor attractions and services accessible to the public during peak visitation periods. When park resources must be closed due to construction, this DO directs park superintendents to communicate these closures with the tourism industry. Park superintendents are responsible for informing visitors, state tourism offices, gateway communities, and tourism-related businesses about current conditions of key park resources, including current protection, recovery, and restoration measures.

DIRECTOR'S ORDER 28: CULTURAL RESOURCE MANAGEMENT

DO-28 calls for the NPS to protect and manage cultural resources in its custody through effective research, planning, and stewardship and in accordance with the policies and principles contained in the NPS *Management Policies* (NPS 1998a). This DO also directs the NPS to comply with the substantive and procedural requirements described in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Treatment of Cultural Landscapes; and the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Building (NPS 1992). Additionally, the NPS will comply with the 2008 Service-wide Programmatic Agreement (PA) with the ACHP and the National

Conference of State Historic Preservation Officers (SHPOs). The accompanying handbook to this order addresses standards and requirements for research, planning, and stewardship of cultural resources including archeological resources, cultural landscapes, historic and prehistoric structures, museum objects, and ethnographic resources.

DIRECTOR'S ORDER 28A: ARCHEOLOGY

This DO supplements *DO-28: Cultural Resources Management Guidelines*, providing guidance to park managers and staff regarding archeological programs. This DO also details archeological program requirements within NPS units and all applicable standards and guidelines (NPS 1998a).

DIRECTOR'S ORDER 53: SPECIAL PARK USES

DO-53 sets forth the policies and procedures for administering Special Park Uses on NPS lands. Special park uses are identified as mandatory or discretionary based on whether they are a right or a privilege of citizens. This DO specifies special uses compliance, permit terms and conditions, and guidelines for specific use rights, such as special events (NPS 2010a).

NATURAL RESOURCES MANAGEMENT GUIDELINE, NPS-77 (1991)

The purpose of this document is to provide guidance to park managers for all planned and ongoing natural resource management activities. Managers must follow all federal laws, regulations, and policies. This document provides the guidance for park management to design, implement, and evaluate a comprehensive natural resource management program.

Local Plans and Policies

All action alternatives must consider local plans and policies. The following initiatives serve to guide development and address important planning issues facing the National Capital Region, the monumental core, and Franklin Park.

L'ENFANT PLAN (1791)

The original plan of Washington, D.C., was laid out by Peter (Pierre) Charles L'Enfant in 1791 as the site of the federal city. L'Enfant developed a plan that featured ceremonial spaces and grand radial avenues, while respecting the natural contours of land. The resulting plan was a system of orthogonal streets with intersecting diagonal avenues that connected the most significant and important landmarks in the city. (NPS 2010b)

COMPREHENSIVE PLAN FOR THE NATIONAL CAPITAL: FEDERAL ELEMENTS (2004)

In August 2004, the National Capital Planning Commission (NCPC) adopted the Comprehensive Plan for the National Capital: Federal Elements. The plan is a statement of goals, principles, and planning policies for the growth and development of the national capital during the next 20 years. The federal elements of the Comprehensive Plan for the National Capital identify and address the current and future needs of federal employees and visitors to the nation's capital; provide policies for locating new federal facilities and maintaining existing ones; promote the preservation and enhancement of the region's natural resources and environment; protect historic resources and urban design features that contribute to the image and functioning of the nation's capital; and working with local, state, and national authorities, support access into, out of, and around the nation's capital that is as efficient as possible for federal and nonfederal workers.

CAPITAL SPACE PLAN

Capital Space is a partnership of the NCPC, NPS, and District of Columbia to develop shared strategies for working together on parks and open space throughout the District. The final Capital Space Plan was

adopted on April 1, 2010, with goals to improve parks and open space in the District and to create healthy and sustainable neighborhoods (Capital Space 2010).

SOIL EROSION AND SEDIMENTATION CONTROL AMENDMENT ACT OF 1994 (D.C. LAWS 10-166)

An erosion and sediment control plan would be prepared and implemented in accordance with the District of Columbia's Soil Erosion and Sediment Control Handbook, which lays out standards and specifications for sediment and erosion control (District Department of the Environment [DDOE] 2003). These guidelines also include direction on stream construction. The sediment and erosion control plan would include resource protection measures that conform to these standards and specifications, and would be submitted to the DDOE for approval.

2013 RULE ON STORMWATER MANAGEMENT SOIL EROSION AND SEDIMENT CONTROL

In 2013, DDOE released the new stormwater and erosion control rule as well as the 2013 Stormwater Management Guidebook (SWMG) for new stormwater management performance requirements in the District. The rule and SWMG are designed to significantly reduce stormwater pollution flowing into the Anacostia and Potomac Rivers, Rock Creek, and other District water bodies by better capturing rainwater into the soil. The rule and SWMG improve equity in how the burden of stormwater management is allocated, provide flexible compliance options, and create a financial incentive for the voluntary installation of stormwater retrofits.

ENERGY INDEPENDENCE AND SECURITY ACT SECTION 438

The Energy Independence and Security Act (EISA), Section 438, requires federal agencies to reduce stormwater runoff from federal development and redevelopment projects to protect water resources. Compliance can include use of a variety of stormwater management practices including reducing impervious surfaces and using vegetative practices, porous pavements, cisterns, and green roofs. EISA 438 compliance would be completed by NPS staff for the selected alternative.

NPS Management Policies

The NPS *Management Policies* (NPS 2006a) is the basic NPS-wide policy document, adherence to which is mandatory unless specifically waived or modified by the NPS director or certain departmental officials, including the U.S. Secretary of the Interior. Actions under this EA are in part guided by these management policies. Sections that are particularly relevant to this project are described in the following section.

SECTION 4.1.3 - EVALUATING IMPACTS ON NATURAL RESOURCES

The NPS must ensure that the environmental costs and benefits of proposed actions are fully and openly evaluated before implementing actions that may impact the natural resources of parks. The process of evaluation must include public engagement; the analysis of scientific and technical information in the planning, evaluation, and decision-making processes; the involvement of interdisciplinary teams; and the full incorporation of mitigation measures and other principles of sustainable park management (NPS 2006a).

SECTION 5.3.1 - PROTECTION AND PRESERVATION OF CULTURAL RESOURCES

The NPS would endeavor to protect cultural resources against overuse, deterioration, environmental impacts, and other threats without compromising the integrity of cultural resources (NPS 2006a).

SECTION 5.3.5 - TREATMENT OF CULTURAL RESOURCES

The NPS would provide for the long-term preservation of, public access to, and appreciation of the features, materials, and qualities contributing to the significance of cultural resources. Cultural resources

are subject to several basic treatments, including (1) preservation in their existing states; (2) rehabilitation to serve contemporary uses, consistent with their integrity and character; and (3) restoration to earlier appearances by the removal of later additions and replacement of missing elements.

SECTION 5.3.5.2.7 - NEW CONSTRUCTION

Contemporary alterations and additions to a cultural landscape must not radically change, obscure, or destroy its significant spatial organization, materials, and features. New buildings, structures, landscape features, and utilities may be constructed in a cultural landscape if (1) existing structures and improvements do not meet essential management needs; (2) new construction is designed and sited to preserve the landscape's integrity and historic character; and (3) the alterations, additions, or related new construction is differentiated from yet compatible with the landscape's historic character, unless associated with an approved restoration or reconstruction. New additions would meet the *Secretary of the Interior's Standards for Rehabilitation.*

SECTION 8.2.2 - RECREATIONAL ACTIVITIES

The NPS would allow a variety of recreational uses and monitor these visitor uses to determine their appropriateness for the specific park unit as well as the level of impairment to park resources (NPS 2006a).

SECTION 8.2.4 - ACCESSIBILITY FOR PERSONS WITH DISABILITIES

The NPS would make all reasonable efforts to make NPS facilities, programs, and services accessible to and usable by all people, including those with disabilities. The NPS will comply with the ABA of 1968, the Rehabilitation Act of 1973, and Section 507 of the ADA (NPS 2006a).

SECTION 8.2.5.1 - VISITOR SAFETY

The NPS strives to protect human life and provide for injury-free visits. As a result, the NPS would apply national safety codes and standards to prevent injuries or recognizable threats to visitor safety and reduce or remove known hazards. Examples of visitor safeguards include the installation of artificial lighting or paved walking surfaces (NPS 2006a).

SECTION 9.1.3.2 - REVEGETATION AND LANDSCAPING

During replanting following construction, to the maximum extent possible, plantings would consist of species that are native to the park or that are historically appropriate for the period or event commemorated. This section also dictates NPS use of soil fertilizers, avoidance of exotic plant species, and preservation of existing plant species (NPS 2006a).

Scoping Process and Public Participation

The NPS initiated public scoping for the EA by issuing a scoping letter on September 6, 2013. The letter was posted to the park's Planning, Environment, and Public Comment (PEPC) website. The public meeting was postponed due to the federal government shutdown, and a public scoping meeting for the Franklin Park Vision and Transformation Plan was held on November 7, 2013, at the Four Points Sheraton in Washington, D.C., from 6 pm to 8 pm. Fifty-six people signed in.

The meeting began with an open house to provide the participants with an opportunity to meet informally with park staff and review informational displays that described the purpose and need for the proposed action, proposed alternatives, existing conditions, project tasks, and the overarching schedule. Following the open house portion, members of the NPS and the District of Columbia Office of Planning (DCOP) team gave a formal presentation on the project background, purpose and need, NEPA and NHPA compliance processes, existing conditions, and key planning considerations. After the presentation, the meeting featured group discussions at tables facilitated by NPS, DCOP, and DowntownDC BID staff to

solicit input and ideas from meeting attendees. Following small-group discussions, attendees were invited to place "Post-it" notes containing new ideas for additional alternatives or considerations on large-format posters that contained an initial set of alternatives concepts developed earlier by the project team. Once the posters contained all new alternatives and considerations, meeting attendees placed adhesive dots on the various alternatives concepts to indicate which ideas they supported and provide the NPS and DCOP with an understanding of the issues that were important to meeting participants. The meeting concluded with an opportunity for a representative from each table to provide a brief summary of the important planning considerations discussed at each small-group session.

The public scoping comment period was open from September 6, 2013, to November 22, 2013. During this time, the NPS provided several methods for the community to provide input on the proposed project. At the public meeting, comment sheets were provided. The public was also directed to provide comments via the NPS PEPC website at http://parkplanning.nps.gov/FranklinPark. During the comment period, 56 pieces of correspondence were received, containing a total of 56 signatures. Fifty-two correspondences were received by webmail through the PEPC system, and four were submitted via the NPS-distributed comment form at the public scoping meeting. Fifty-five commenters were from Washington, D.C., and one commenter was from Connecticut. All comments received were from individuals not affiliated with any association or organization.

A large portion of the commenters expressed interest in the addition of a play area element. Other commenters expressed support for eating, dining, and bathroom facilities. Several commenters noted potential new alternative elements.

ALTERNATIVES SCOPING

After the initial scoping meeting and following conclusion of the public scoping period, the project team reviewed and analyzed the public comments and used this input to develop alternatives. Following the alternatives development process, a second comment period began February 12, 2014, and concluded March 14, 2014. During this time, another public meeting was held on February 19, 2014, at the Hilton Garden Inn, Washington, D.C., from 6 pm to 8 pm. The purpose of the meeting was to provide information to the public about the design alternatives and gather public input regarding the alternatives presented at the meeting. Approximately 51 people attended the meeting.

At the public meeting and during the 30-day public scoping period, the NPS received a total of 65 comments from unaffiliated individuals and one comment from Stand UP! For Democracy (Free DC). The commenters generally articulated support or feedback on the range of alternatives.

Agency Consultation

Coordination with local and federal agencies and various interest groups was conducted during the NEPA process to identify issues and/or concerns related to the proposed revitalization of Franklin Park. In accordance with Section 7 of the Endangered Species Act, consultation letters were sent from the NPS to the USFWS on September 6, 2013, and to the District of Columbia Department of the Environment, Fisheries and Wildlife Division on September 6, 2013 (see Appendix A).

Section 106 of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. In accordance with the regulations implementing Section 106, letters initiating the process were sent to the District of Columbia State Historic Preservation Officer (DC SHPO), ACHP, and NCPC on September 6, 2013. Documentation of these efforts to obtain public agency consultation is contained in Appendix A.

Throughout this project, the Section 106 process and NEPA assessment have been closely coordinated, and in some cases, public scoping has been used to satisfy the requirement for both processes. For the purposes of Section 106, two consulting party meetings were held:

- The first Section 106 meeting was held on September 9, 2013, and included the CFA, NCPC, and DC SHPO.
- The second consulting party meeting was held on February 26, 2014, and included the DC SHPO, DowntownDC BID, NPS, NCPC, NPS/National Capital Region (NCR), and Slater Associates.

In addition to consulting party meetings, there were also two technical advisory and stakeholder meetings held on December 9, 2013, and February 3, 2014. An additional technical advisory meeting was held on October 24, 2013. NCPC is a cooperating agency for this project.

Issues and Impact Topics

Issues describe problems or concerns associated with current impacts from environmental conditions or current operations as well as problems that may arise from the implementation of any of the alternatives. Potential issues associated with the revitalization of Franklin Park were identified during internal and public scoping. The NPS's primary concern is to ensure that any alternative considered will allow for minimal disturbance of the existing park uses and the cultural landscape. The issues and concerns identified during scoping were grouped into impact topics that are described in "Chapter 3: Affected Environment" and analyzed in "Chapter 4: Environmental Consequences."

Impact Topics Analyzed in this EA

SOILS

As a result of intensive use by visitors and commuters, social trails with severely compacted soils have become prevalent. Some of the proposed actions would change the paved pathways to more closely align with the social trails and repair the turf in other areas resulting in impacts to soils. In addition, because of the proposed addition of certain amenities under some of the action alternatives, some soil would be removed and or have hardscape placed over top of it, possibly resulting in compaction. Because of the potential impacts that could occur from removal of soil and addition of hardscaping, soils are addressed as an impact topic in this EA.

VEGETATION

The proposed action alternatives provide designs that would impact vegetation in the park with potential impacts to the amount of turf, individual trees removed, and overall tree canopy. As a result of these potential impacts, vegetation is addressed as an impact topic in this EA.

VISITOR USE AND EXPERIENCE

The park serves as a location for recreation and respite for local residents, office workers, and commuters waiting for their bus or walking to and from the McPherson Metro Station. The proposed action alternatives would result in impacts to visitor use by affecting movement and circulation throughout the park as well as introducing a variety of new amenities including a children's play area, a café, and the possibility for new recreational activities. The redesign of Franklin Park would have short-term and long-term effects. The short-term effects would be limited to the closures due to construction at the site, and the long-term impacts would occur after construction completion due to new park amenities, improved aesthetics, and over time as visitor use changes after revitalization of the park. As a result of these impacts, visitor use is addressed as an impact topic in this EA.

CULTURAL RESOURCES

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

- **Cultural Landscapes:** A geographic area, including both cultural and natural resources and the wildlife and wildlife habitat or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.
- **Archaeology:** Material remains or physical evidence of past human life or activities which are of archeological interest.
- **Historic Structures or Districts:** Historic properties significant in the history of American architecture, culture, engineering, or politics at the national, state, or local level.
- **Museum Collections:** Prehistoric and historic objects, artifacts, works of art, archival documents, and natural history specimens. Prevention of damage and minimization of potential for deterioration are NPS management goals.
- **Ethnography:** Cultural and natural features of a park that are of traditional significance to traditionally associated peoples, which include contemporary park neighbors and ethnic or occupational communities that have been associated with a park for at least two or more generations (40 years), and whose interests in the park's resources began before the park's establishment.

Under the regulations implementing Section 106 of the NHPA, the NPS determined that proposed action would constitute an "undertaking," having a potential effect on NRHP resources, and then assessed both an Area of Potential Effect (APE). The proposed action has the potential to effect two types of cultural resources identified above: cultural landscapes and historic structures and districts. Therefore, the EA includes the assessment of potential impacts to these resources. Archeology, museum collections and ethnography have been dismissed from further analysis.

PUBLIC SAFETY AND ACCESSIBILITY

The proposed action alternatives would have impacts to public safety and accessibility due to improved park amenities such as new lighting; repaved walkways; and, for alternatives proposing a café, the presence of park staff. The potential for new activities and programming would also impact use patterns on the site. This change in usage and culture of the park has the potential to impact the crime and public safety associated with the park. In addition, several of the action alternatives propose changes to the circulation and accessible pathways located in the park, which would impact accessibility to and from the park. As a result, public safety and accessibility are addressed as an impact topic in this EA.

PARK OPERATIONS AND MANAGEMENT

The revitalization and transformation of Franklin Park would impact park management and operations due to the potential for additional staffing and maintenance needs. There would also be impacts to park management and operations due to improvements to existing deficiencies. The potential added programming at Franklin Park would require increased staffing and changes to park management. As a result of these potential new developments, park operations and management is addressed as an impact topic in this EA.

Impact Topics Dismissed from Further Analysis

AIR QUALITY AND CLIMATE CHANGE

The 1963 Clean Air Act, as amended (42 USC 7401 et seq.), requires federal land managers to protect air quality in national parks. The project site is located in the Washington Metropolitan Area nonattainment zone for ozone. During construction, dust and vehicle emissions would temporarily affect local air quality. Overall, there would be a slight and temporary degradation of local air quality due to dust generated from construction activities, but these effects would be localized and negligible to minor. The

park's current level of air quality would not be affected by the proposed action; therefore, this topic was dismissed as an impact topic.

Climate change refers to any significant changes in average climatic conditions (such as mean temperature, precipitation, or wind) or variability (such as seasonality and storm frequency) lasting for an extended period (decades or longer). Recent reports by the U.S. Climate Change Science Program, the National Academy of Sciences, and the United Nations Intergovernmental Panel on Climate Change provide evidence that climate change is occurring as a result of rising greenhouse gas emissions and could accelerate in the coming decades.

While climate change is a global phenomenon, it manifests differently depending on regional and local factors. General changes that are expected to occur in the future as a result of climate change include hotter, drier summers; warmer winters; warmer ocean water; higher ocean levels; more severe wildfires; degraded air quality; more heavy downpours and flooding; and increased drought. Climate change is a far-reaching, long-term issue that could affect the park and its resources, visitors, and management. Although some effects of climate change are considered known or likely to occur, many potential impacts are unknown. Much depends on the rate at which the temperature would continue to rise and whether global emissions of greenhouse gases can be reduced or mitigated. Climate change science is a rapidly advancing field, and new information is being collected and released continually.

Construction activities associated with implementation of the proposed action would contribute to increased greenhouse gases emissions, but such emissions would be short term, ending with the cessation of construction, and it is not possible to meaningfully link the greenhouse gases emissions of such individual project actions to quantitative effects on regional or global climatic patterns. Any effects on climate change would not be discernible at a regional scale. Therefore, this impact topic was dismissed from further evaluation.

CULTURAL RESOURCES

Certain cultural resources, not primarily associated with the NRHP, are impact topics under NPS regulations that must be evaluated or dismissed in EAs (NPS 1998a). Three cultural resource topics – archeology, museum collections, and ethnographic resources – were dismissed from further analysis.

ARCHEOLOGY

During the early stages of planning, the NPS sponsored an archeological assessment (LeeDecker and Wagner 2014) to assess the general condition of the landscape, focusing on identification of prehistoric or historic landscapes that might contain archeological resources. The study methods included archival research to understand the historical and physical development of the property, followed by subsurface investigation that was accomplished by a series of soil borings. All 11 borings revealed a deeply truncated landscape, indicative of deep grading that reached depths as great as 15 feet or more below the present ground surface. Given the park's history of formal landscaping, evidence of grading was expected, but none of the cores showed evidence of a landscape surface that would have been present during prehistoric, colonial, or antebellum times. Three borings in the southeast corner of the park had deeply buried sediments that would have formed at the bottom of a pond, which is consistent with early accounts of a small lake or pond at the corner of 13th and I Streets, NW.

The soil boring results suggest that there is some possibility for preservation of archeological remains associated with nineteenth-century urban infrastructure, most importantly a spring-fed reservoir in the central area of the park that is presently known only from archival sources. Any surviving archeological remains of this reservoir would be expected below the plaza pavement and walkways where further exploration would require demolition of the existing landscaping. Further archeological investigation would best be deferred until such time as the landscape rehabilitation program is underway. Then, if the park rehabilitation program requires major grading in the area of the suspected reservoir, an archeological study could be completed during the construction phase of the project.

Ground-disturbing activities associated with the proposed action alternatives would include the placement of foundation and utility lines for the proposed café facility; because the new facility would be quite small, foundation work would be relatively minor and confined to areas of documented fill. Other ground-disturbing activities associated with added hardscaping, the play area, and other amenities are not expected to reach the depth where significant resources are found.

Because none of the action alternatives would have any foreseeable impacts to archeological resources, archeological resources was dismissed as an impact topic in this EA. As the design plans for the project proceed, the NPS will review the development plans to assess possible impacts to archeological resources. If the selected design requires excavations that might impact potential archeological resources, the NPS would continue Section 106 consultation with the DC SHPO and other parties through the standard review process under 36 CFR §800 or under the terms of the 2008 NPS-wide PA. Through this ongoing process, it is assumed that any impacts to archeological resources would be avoided or mitigated to the extent that they would be negligible. The Section 106 consultation process for this project is described in "Chapter 5: Consultation and Compliance."

MUSEUM COLLECTIONS

The proposed action would not have any direct effect upon recognized museum collections (historic artifacts, natural specimens, and archival and manuscript material); therefore, museum collections was dismissed as an impact topic.

ETHNOGRAPHIC RESOURCES

The NPS defines ethnographic resources as any "site, structure, object, landscape, or natural resources feature assigned traditional, legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it" (NPS 1998b). In this analysis, the NPS's term "ethnographic resources" is equivalent to the term "Traditional Cultural Property" (TCP), which is more widely used in cultural resource management. Guidance for the identification of ethnographic resources is found in National Register Bulletin #38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties* (NPS 1998b). The key considerations in identifying the TCPs are their association with cultural practices or beliefs of a living community that are (1) rooted in the community's history, and (2) are important in maintaining the continuing cultural identity of the community (Parker and King 1998). No properties meeting the definition of a TCP lie within the APE; therefore, ethnographic resources was dismissed as an impact topic.

SOCIOECONOMICS

Several of the action alternatives propose a redevelopment that could include a café and a children's play area, as well as the potential for increased recreational activities. In the case of increased visitation due to park redevelopment, there would be potential impacts to surrounding businesses; however, these impacts would be expected to be beneficial and not make a noticeable impact on surrounding businesses. As a result of these potential impacts, socioeconomics was dismissed as an impact topic in this EA.

TRAFFIC AND TRANSPORTATION

The proposed action alternatives provide a variety of options that have the potential to impact transportation and traffic. The alternatives propose to widen sidewalks, which would affect accessibility and pedestrian flow, but would not be expected to impact existing traffic flow or patterns. As a result, traffic and transportation was not addressed as an impact topic in this EA.

WATER RESOURCES

The current landscape of the park is filled with turf grass and mature trees, which provide some reduction in stormwater volume and flow intensity. Some of the action alternatives provide designs that would reduce tree canopy and possibly reduce or impact topsoil and turf grass. However any increase or

decrease in stormwater retention at Franklin Park would not have a measureable effect on the Potomac River watershed. Therefore, water resources are not addressed as an impact topic in this EA.

FLOODPLAINS

EO 11988, *Floodplain Management*, provides for the protection of floodplain values, while NPS *DO 77-2: Floodplain Management* (NPS 2002) provides the NPS with requirements for implementing the EO. The project area for Franklin Park is not in a floodplain; therefore, a floodplain statement of finding is not necessary for this project because the proposed action would not affect floodplain functions or values, affect flood water flows, or involve construction of structures that could be affected by flooding. Consequently, floodplains was dismissed as an impact topic.

GEOLOGY

The proposed action would not inherently change or alter the geological resources on the park grounds, although soils would be displaced during construction. Impacts to soils are addressed in "Chapter 4, Soils." Therefore, because related impacts are addressed under the soils section, geology was dismissed as an impact topic.

INDIAN TRUST RESOURCES

Secretarial Order 3175 requires that any anticipated impacts to Indian trust resources from a proposed project or action by U.S. Department of the Interior agencies be explicitly addressed in environmental documents. The federal Indian trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal law with respect to American Indian and Alaska Native tribes.

There are no Indian trust resources in the Washington, D.C., area. The lands comprising the National Mall and Memorial Parks, including Franklin Park, are not held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians. Therefore, the impact topic of Indian trust resources was dismissed.

WETLANDS

No wetlands would be affected by the proposed action; therefore, wetlands were dismissed as an impact topic.

WILDLIFE

The project area is in an urban setting, surrounded by approximately 12 story office buildings. It is adjacent to heavily used roads with attendant vehicle noise. As a result, wildlife in the project area is limited to adapted urban species, such as raccoons, waterfowl, squirrels, songbirds, and an occasional hawk using the larger trees to perch. No raptor nesting is known or expected. Although construction-related activities may temporarily displace wildlife from the area, the proposed action would not result in greater than negligible effects on wildlife or wildlife habitat. Due to the area's urban context, the level of human activity, and minimal habitat value, wildlife was dismissed as an impact topic.

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CHAPTER 2: ALTERNATIVES

Introduction

The NEPA requires that federal agencies explore a range of reasonable alternatives. The alternatives under consideration must include the "no action" alternative as prescribed by 40 CFR 1502.14. Any alternative analyzed must meet the management objectives of the park, either wholly or partially, while also meeting the purpose of and need for the project.

Project alternatives may originate from the proponent agency, local government officials, or members of the public. Alternatives may also be developed during the early stages of project development at public meetings or in response to comments from coordinating or cooperating agencies. Alternatives analyzed in this document are the result of internal scoping, public scoping, public alternatives, agency consultation, technical advisory meetings, and stakeholder advisory meetings. Components of the action alternative represent the outcome of extensive collaboration among the NPS, DCOP, the DowntownDC BID, and DC Parks and Recreation.

The NPS and partners explored and objectively evaluated a range of alternatives. After extensive collaboration among the NPS, partners, and cooperating agencies, several alternatives were dismissed from consideration, and three alternatives (the No Action Alternative and two action alternatives, one of which contains options for specific elements) were carried forward for further analysis. These alternatives are described in more detail in the following section.

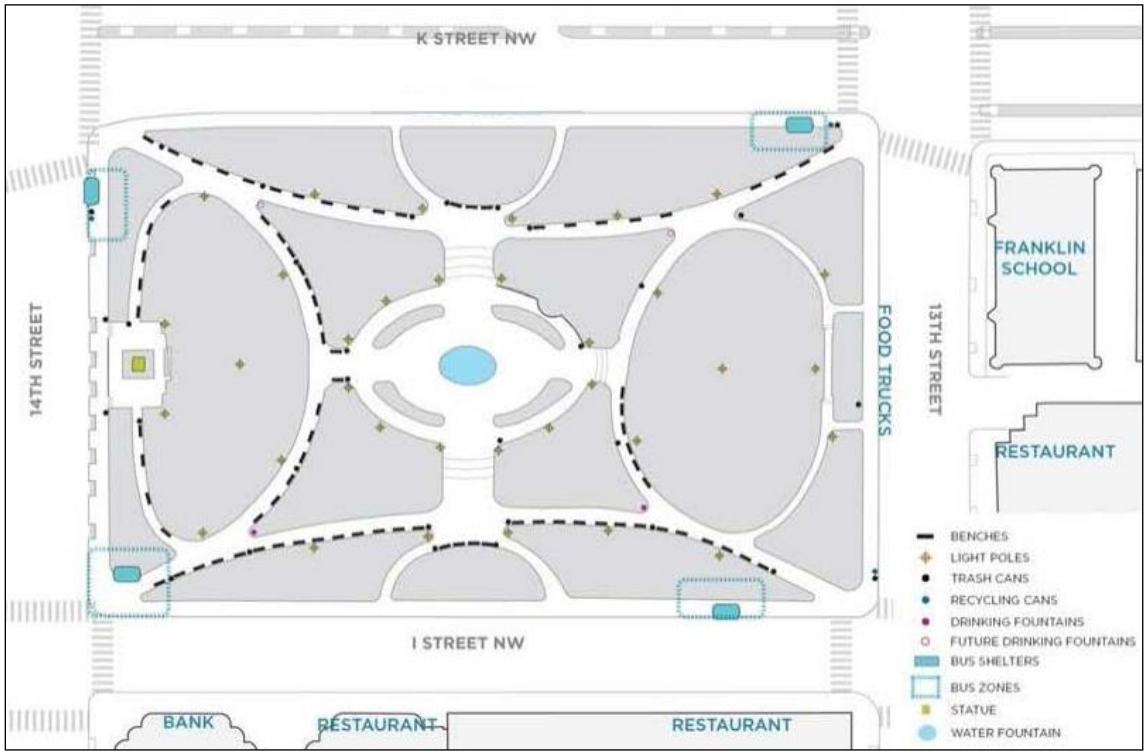
Alternative 1: No Action Alternative

The No Action Alternative represents a continuation of the existing conditions, operations, maintenance, programming, and visitor use of the Franklin Park area. Under the No Action Alternative, the park would continue to be used during peak hours, namely the AM and PM rush hours as well as lunch time. The existing circulation patterns would continue, with many visitors using the park to cut across the parcel in order to access the McPherson Square metro station. As a result, the social trails would remain and continue to be subject to substantial wear due to the high intensity and frequency of pedestrian use. The degraded bituminous pathways would not be replaced or repaired. The total amount of soft surface in the park would remain at 145,000 square feet. The total amount of hardscape in the park would remain at 73,000 square feet (Figure 2.1).

The current fountain and associated plumbing system would remain in place with extensive deficiencies. The compromised filtration system and the structural integrity of the existing fountain, currently in need of renovation, would become inoperable with time.

Ongoing maintenance of Franklin Park would continue. Currently NPS staff complete regular maintenance tasks at the park, including trash pickup, tree and shrub care including pruning and mulching, and snow and ice removal, as needed. Landscaping maintenance, such as mowing, weed control and leaf removal would continue to be completed by an outside contractor at regular intervals. The DowntownDC BID contributes to the operation of the park by providing trash pickup, cleaning, and hospitality. The existing tree profile would continue to be maintained, including historic, old, and poor condition trees. Per current management practices, hazardous trees would be removed as they arise. The tree canopy cover would remain at 74% of the total project area.

Figure 2.1 – Alternative 1: No Action Alternative



Elements Common to All Action Alternatives

The following elements would be considered under all action alternatives:

- The existing Commodore John Barry statue and its adjoining plaza would remain unmoved and would continue to be oriented in the same direction.
- Metered electric charging stations would be added to the eastern edge of the park along the street edge of 13th Street NW.
- The 1930s-era benches would be supplemented with removable seating and additional benches in complementary style. ADA-accessible arm rests could be added.
- The Saratoga style lights may be shifted from their original location and may be supplemented with additional Saratoga style or other complementary fixtures.
- New bus shelters would be added. Under Alternative 3, these shelters would be inset into planters along I Street NW.
- Seventeen trees identified as in poor condition by the park arborist would be removed and replaced in kind when replacement does not interfere with the proposed design alternatives. If trees being replaced interfered with the proposed design alternatives, replacement trees would be placed in other areas of the park.
- The existing exposed aggregate quarter round curb would be replaced with smooth quarter round concrete curbing that is consistent with the quarter round curbs in other parks. This would be in keeping with the dimensions of quarter round curbing as the existing curbing is higher and wider than standard.

Additionally, all alternatives would need to be in compliance with relevant federal and local stormwater requirements, as described in "Chapter 1: Purpose and Need." Stormwater and erosion controls would be completed during the design phase to ensure compliance with EISA 438 as well as the 2013 DC Department of the Environment (DDOE) Stormwater Management Guidebook. These regulations are designed to reduce stormwater runoff from development projects to protect water resources, including the Potomac River.

EISA 438 requires that all federal developments that exceed 5,000 square feet of development maintain or restore pre-development hydrology, specifically through retaining rainfall on-site through infiltration, evaporation/transpiration, and re-use to the same extent that occurred prior to development. Design examples include bioretention, porous pavements, and vegetated swales. Similarly, the DDOE stormwater requirements require the retention of stormwater volume onsite with a variety of stormwater mana gement practices using similar design techniques. Under DDOE stormwater requirements, major substantial improvement activities must retain the volume of stormwater runoff from a 0.8-inch storm event. A major substantial improvement activity includes land disturbing of 5,000 square feet or greater, similar to EISA requirements. Previous District regulations focused on the removal of pollutants from stormwater runoff, however 2013 revisions to the regulation have changed the focus to volume retention. As discussed above, stormwater retention volume can be managed through various runoff prevention measures (less impervious surface), runoff reduction (infiltration or water reuse) and runoff treatment (soil filter systems or use of permeable pavement). Prior to construction, the NPS would complete a Stormwater Management Plan that demonstrates the computations, designs, potential impacts, and the best management practices that are proposed to manage the stormwater runoff, as well as the maintenance and construction schedules for DDOE approval.

Figure 2.2 – Trees Recommended for Removal by NPS Arborist

Alternative 2: The Center

Alternative 2, The Center, proposes to rehabilitate and enhance the park while retaining much of its existing historic spatial symmetry and context. This alternative provides options for either the no addition of a café building (Option A) or the construction and placement of a café building and associated amenities (Option B). These options have implications for hardscaping, and tree canopy treatments and are described below in further detail.

CENTER PLAZA

Alternative 2 would retain the current size and structure of the central plaza including the ring of trees and plantings on the plaza. Seasonal plantings would be added to the perimeter of the plaza. The central plaza treatment is shown in Figures 2.3 and 2.4.

Figure 2.3 – Alternative 2 Option A

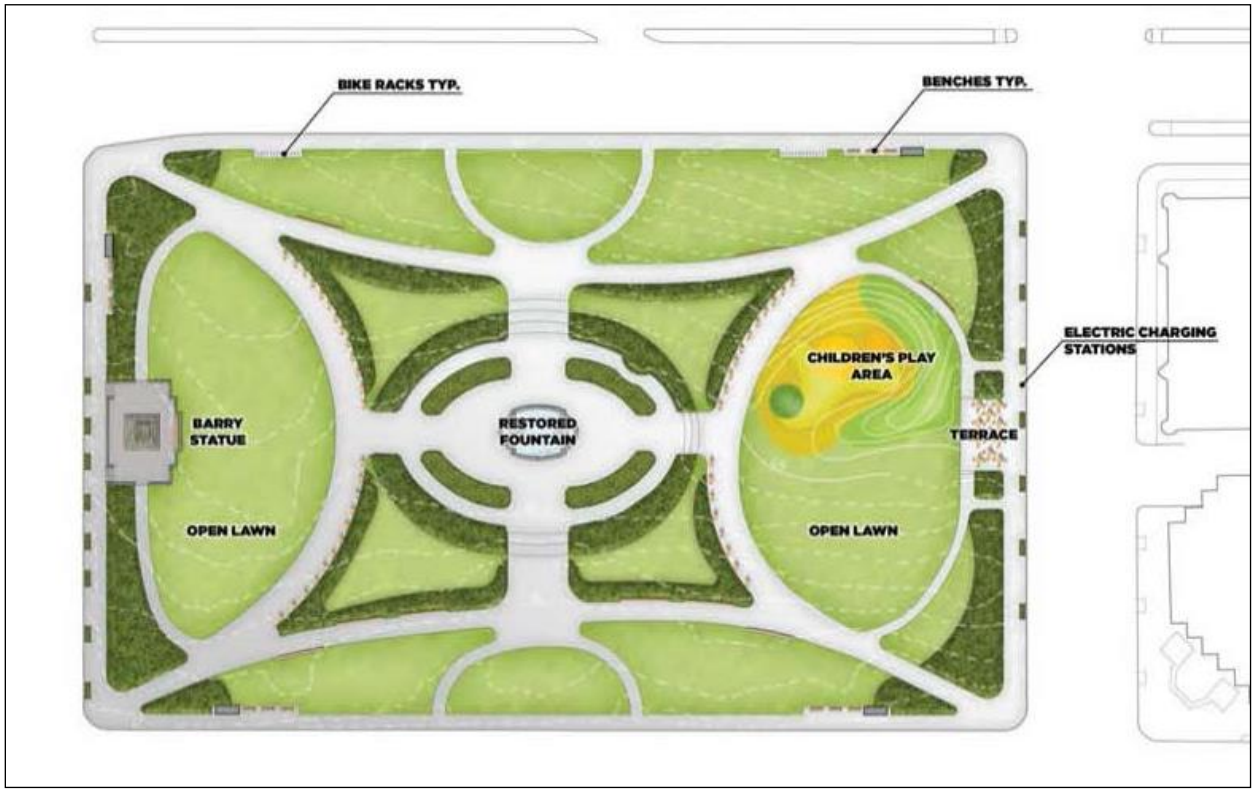
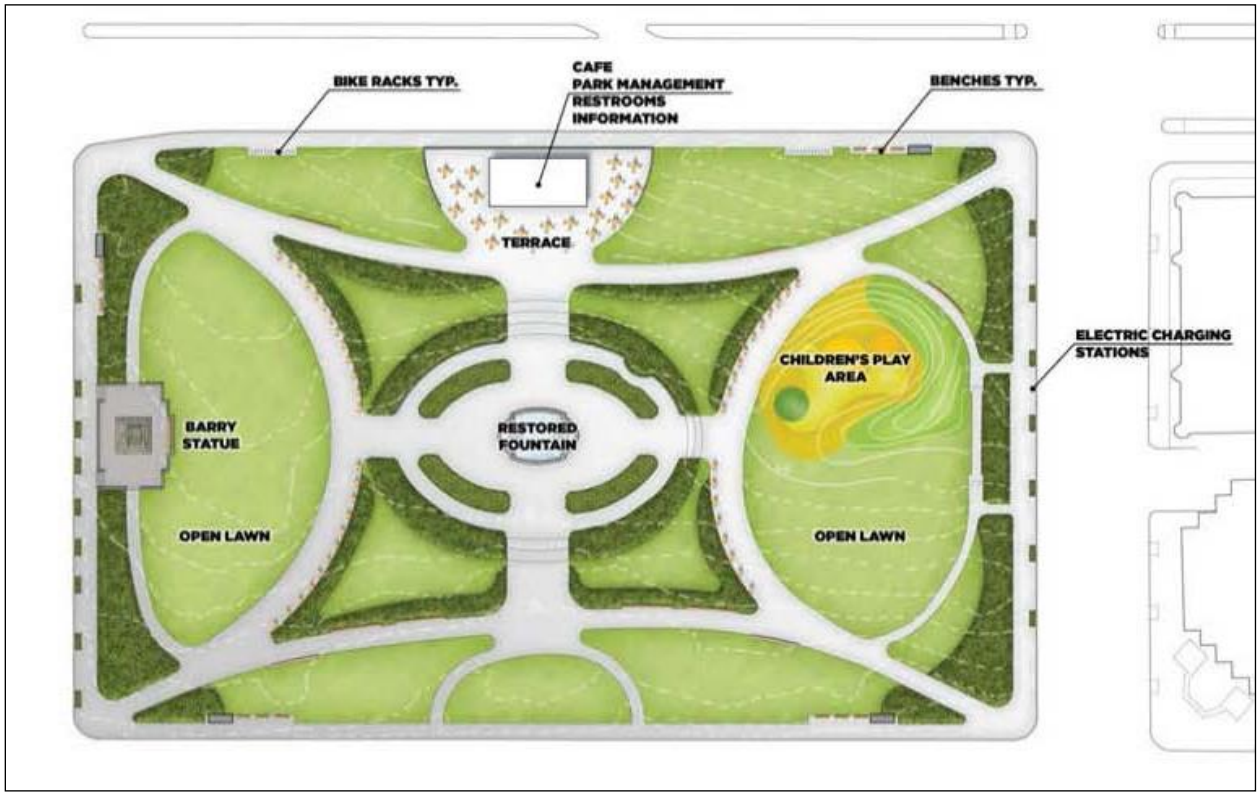


Figure 2.4 – Alternative 2 Option B



CENTRAL WATER FEATURE

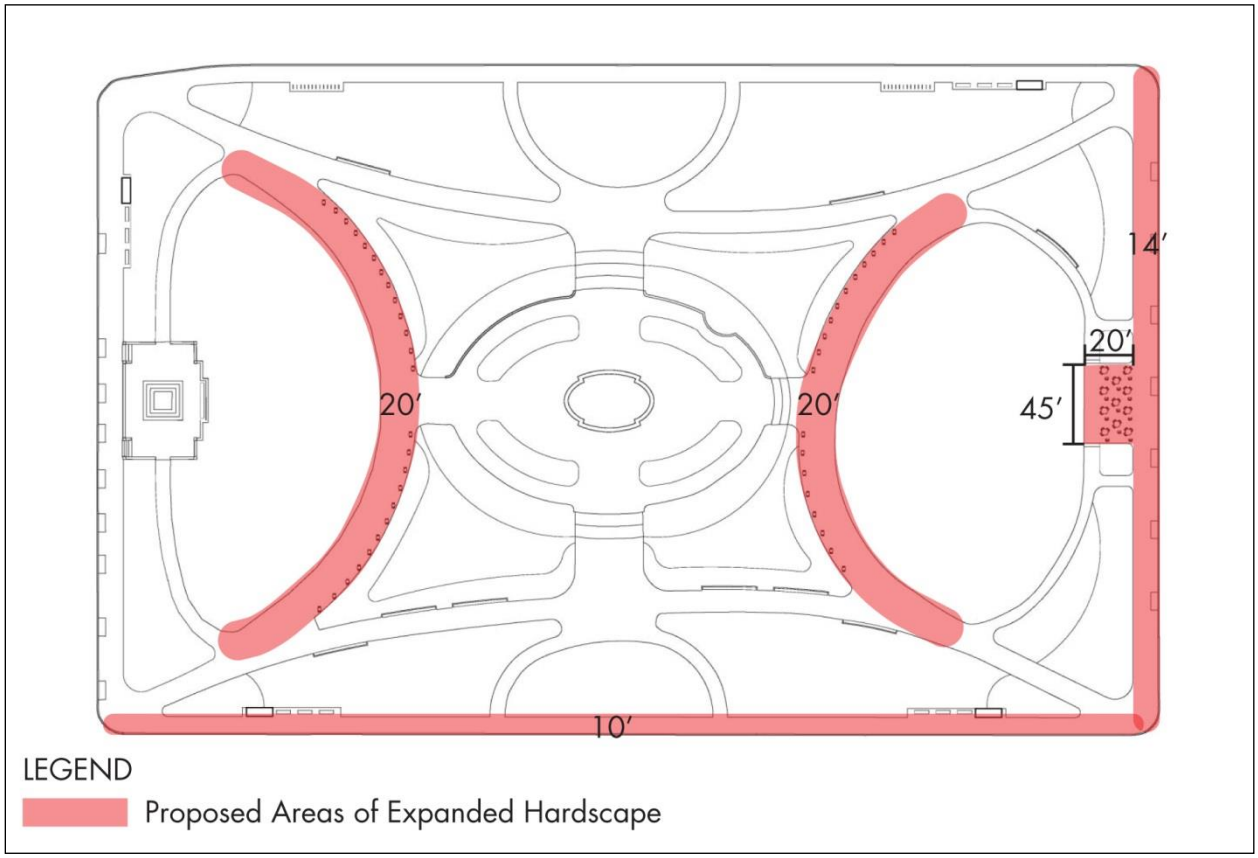
Under this alternative, the existing fountain would be restored, resolving filtration, plumbing, and structural deficiencies. The form and structure of the existing fountain would be retained. The restoration of the fountain would follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes.* Existing fountain material would be used when possible.

HARDSCAPE OPTIONS

Alternative 2 considers two options for hardscaping (options A and B) with different sizes and locations depending on if a café and associated structures are added as described below under Café and Basic Amenities Options. The added hardscaping would serve to demarcate zones within the park and provide space for formal and informal events. Under both options, turf damaged by the existing social trails would be repaired.

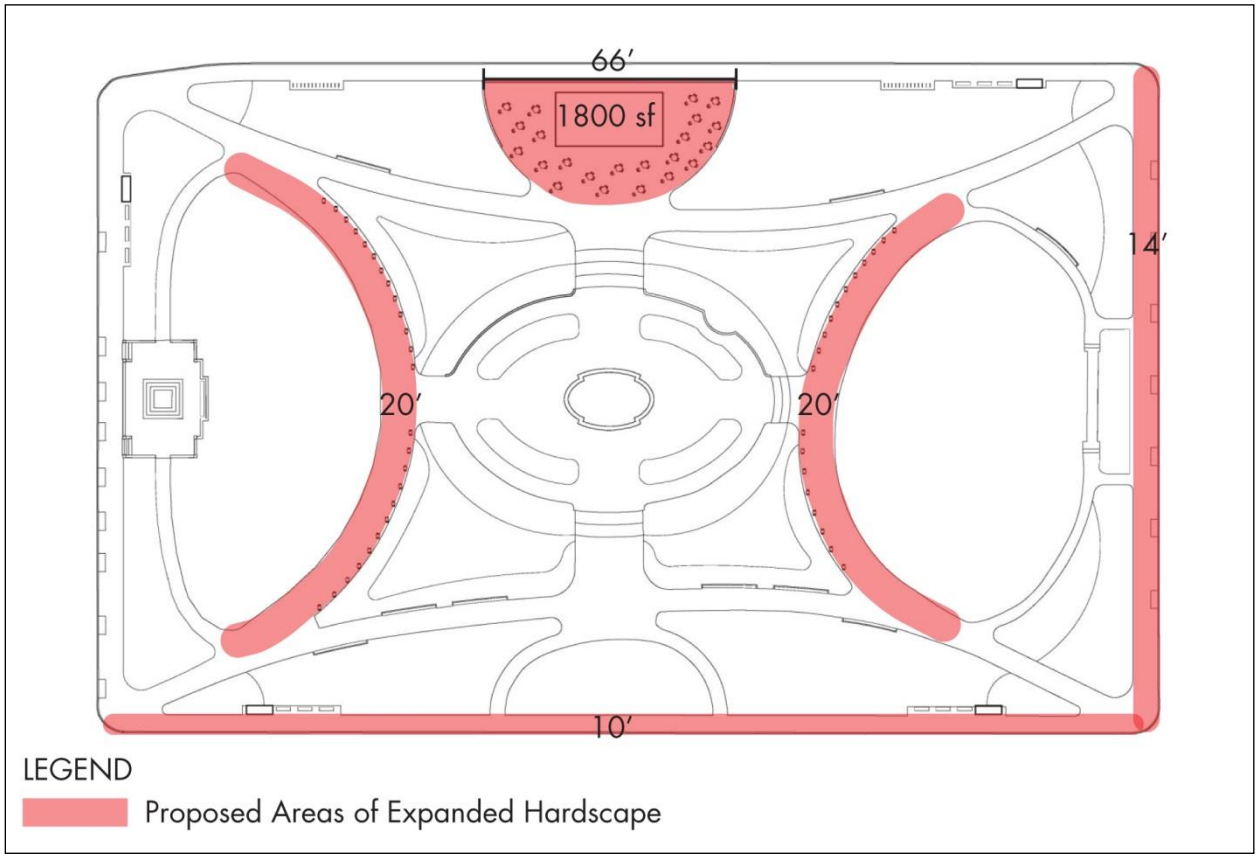
Option A – In this option (see Figure 2.5), a small, rectangular terrace, 45 feet in length and approximately 20 feet in width, would be constructed on the central, eastern edge of the park. The historic pathways on the east and west sides of the fountain would be widened, but would follow the existing elliptical shape. The fabric of the internal pathways in the park would be removed and replaced with a more sustainable and durable material. For this option, the amount of soft surface in the park would be 130,000 square feet, and the amount of hardscape would be 79,000 square feet.

Figure 2.5 – Alterative 2 Option A Proposed Additional Hardscape



Option B – In this option (see Figure 2.6), a larger semi-circular terrace would be constructed on the central, northern edge of the park. The boundaries of this plaza would align with the existing green ellipse lawn in the same location. Similar to Option A, the historic pathways on the east and west sides of the fountain would be widened and the existing bituminous surface of the internal pathways would be replaced. For this option, the amount of soft surface in the park would be 124,000 square feet, and the amount of hardscape would be 85,000 square feet, an additional 12,000 square feet of impervious surface.

Figure 2.6 – Alterative 2 Option B Proposed Additional Hardscape



CAFÉ AND BASIC AMENITIES OPTIONS

This alternative considers two options (options A and B) for either no addition of a café building or the placement of a café building, which would include a maintenance space, information booth, and restrooms. No preliminary concepts for the café design have been developed; however, the café design would be completed in coordination with local planning agencies, including the NCPC and CFA, to ensure the design would be appropriate for the context of the urban park setting.

Option A – In this option (see Figure 2.3), no café structure or related amenities would be added to the park.

Option B – In this option (see Figure 2.4), an 1,800-square-foot café would be constructed on the central, northern edge of the park. The café structure would also house other basic amenities including a maintenance space, information booth, and restrooms within the same building structure. The project team would research the historic lodge previously located in the park and study other existing structures located in Lincoln Park, Lafayette Park, and Dupont Circle and use these earlier design examples to inform the Franklin Park building design.

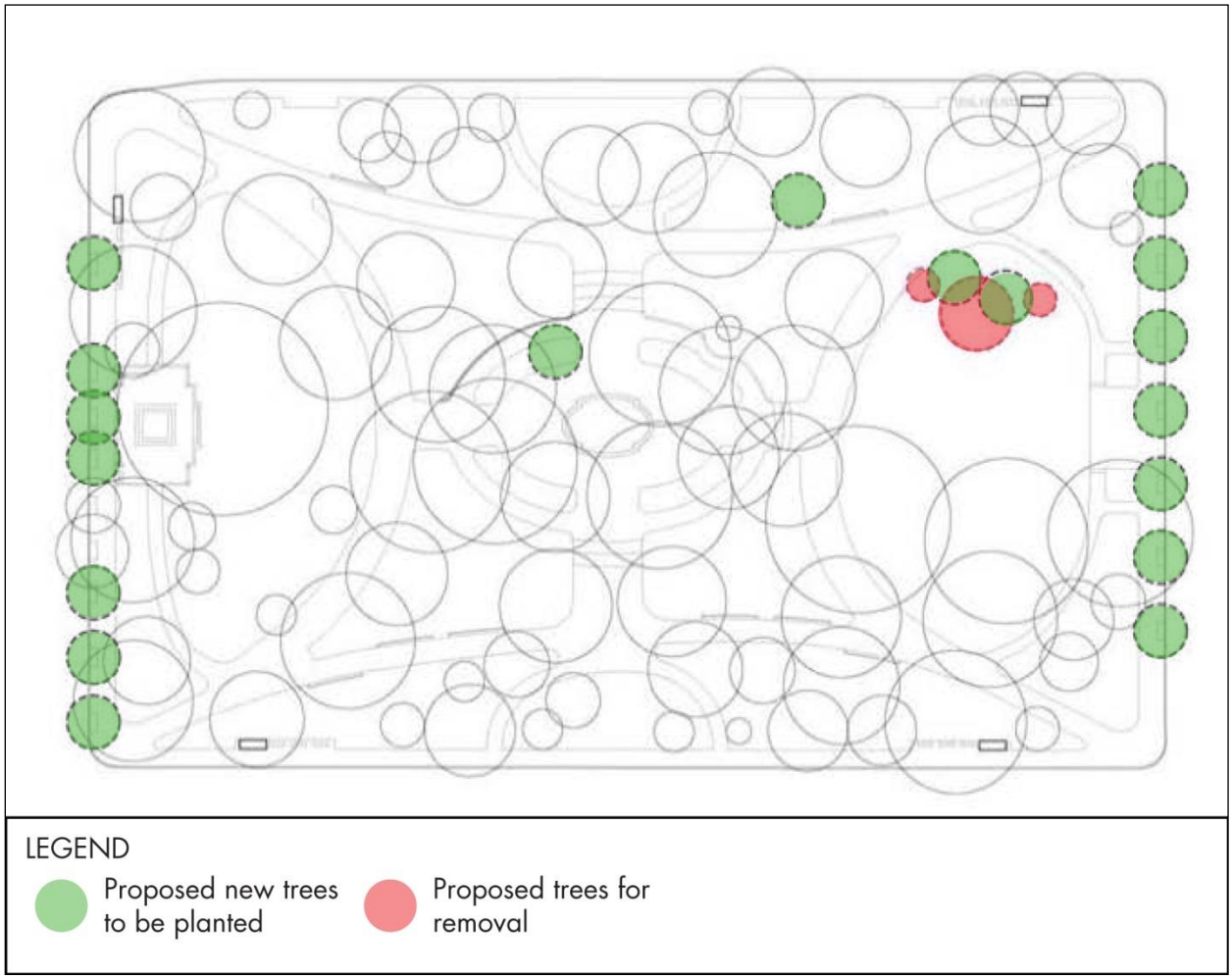
PLAY AREAS

Under Alternative 2, a 9,000-square-foot children's play area would be added to the northern part of the east lawn (see Figures 2.3 and 2.4). The construction of the play area would require slight regrading of the site. The play area would be fenced off from the surrounding park visitors. The play area would be designed using natural materials to be compatible with the landscape of the park and could include rocks, logs, and other landscape and topographic features.

TREE CANOPY OPTIONS

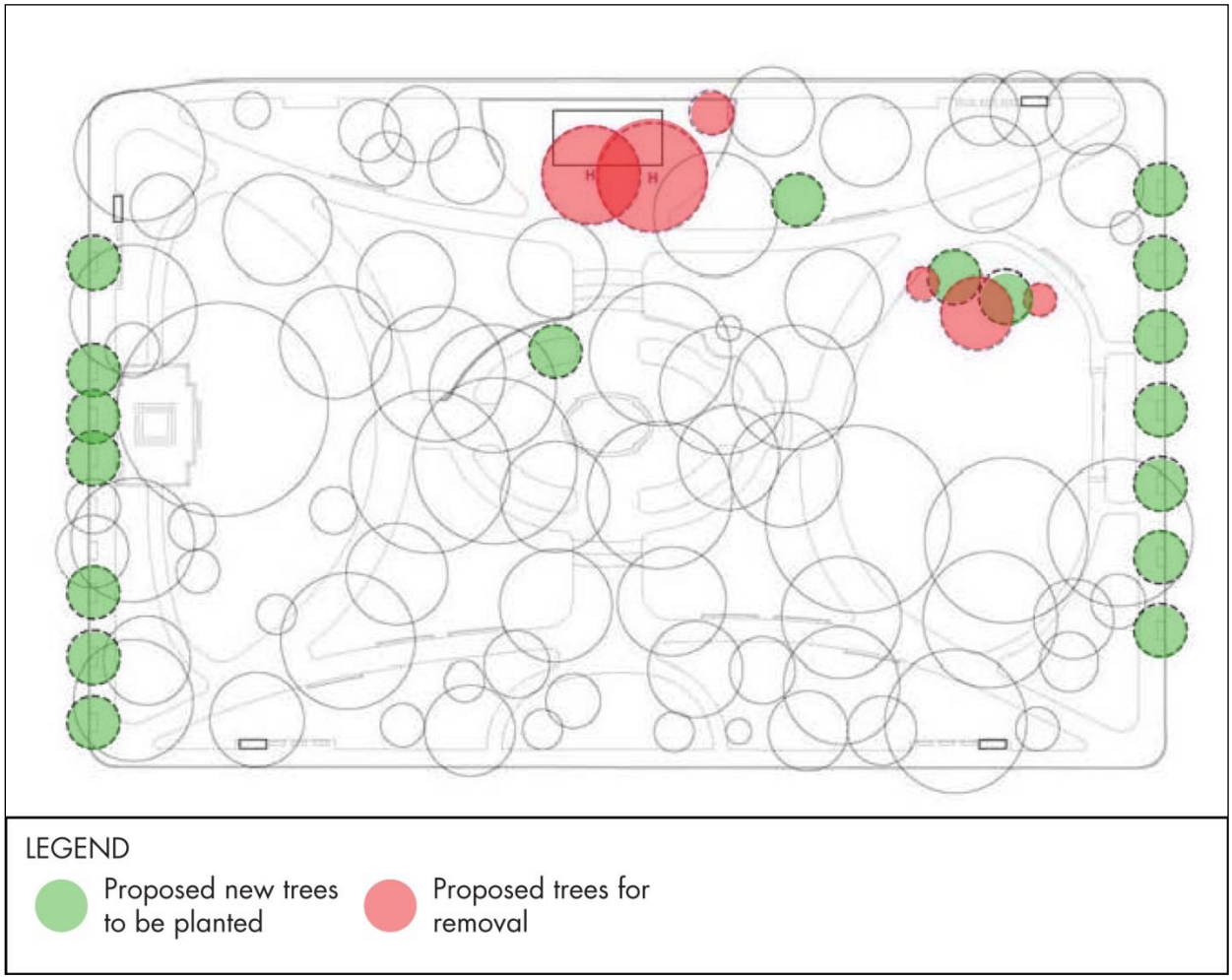
Option A – Three trees would be removed in addition to the 17 unhealthy trees recommended for removal under all action alternatives. No historic pre-1936 trees would be removed. Eighteen young trees would be planted primarily along the outside perimeter of the park, resulting in tree canopy cover of 73% of the park area (see Figure 2.7 for more detail and placement of trees).

Figure 2.7– Alternative 2 Option A



Option B – Six trees would be removed (to accommodate for the café) in addition to the 17 unhealthy trees recommended for removal under all action alternatives. Two of the six trees recommended for removal under this option are historic, planted pre-1936. Eighteen young trees would be planted primarily along the outside perimeter of the park, which would result in tree canopy of 71% of the total park area (see Figure 2.8 for more detail and placement of trees).

Figure 2.8 – Alternative 2 Option B



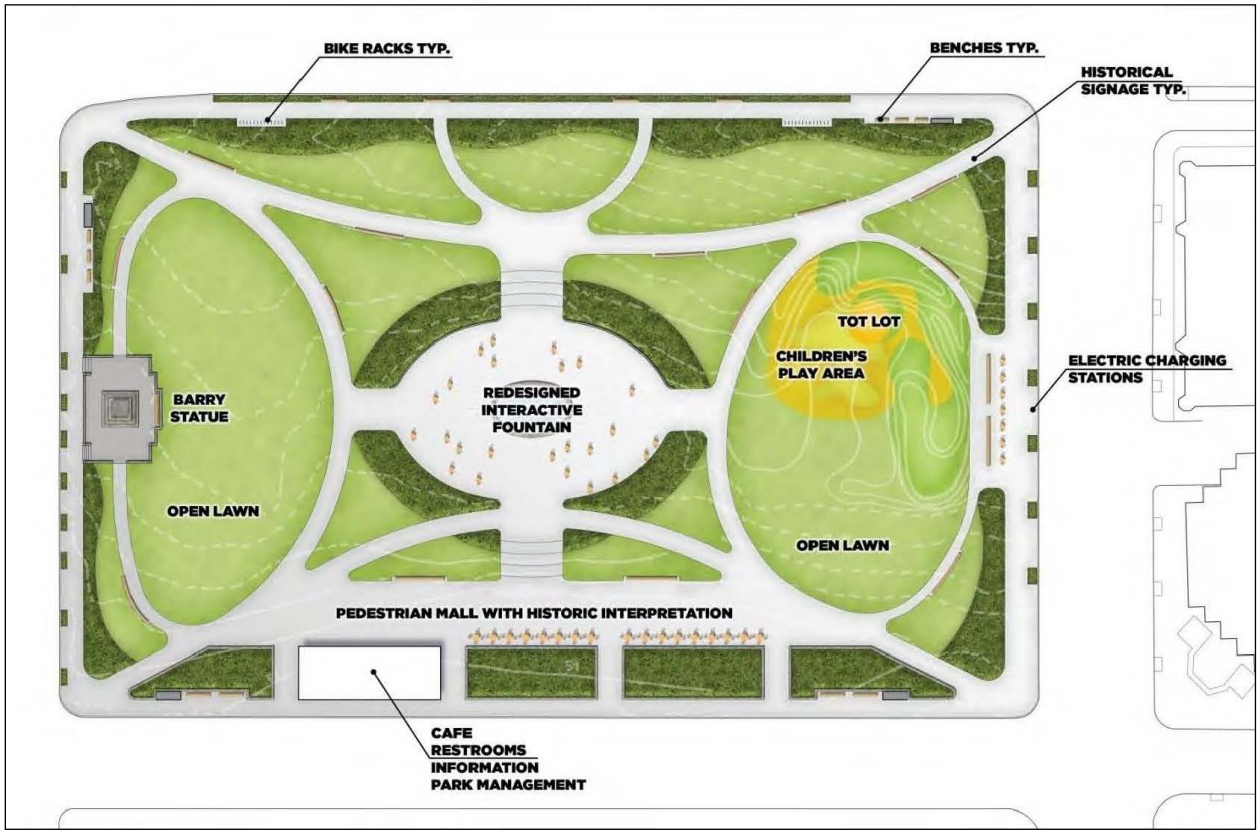
Alternative 3: The Edge

Alternative 3, the Edge, proposes to rehabilitate and enhance the park while retaining much of the historical spatial symmetry. Alternative 3 would add hardscaping for events and park programming. This alternative would also adjust the existing pathways to more closely align with the direct diagonal social trails, while still keeping the general curved layout of the existing pathways. There are no options within Alternative 3.

CENTER PLAZA

Under Alternative 3, the ring of tree plantings on the central plaza would be removed, and the dimensions of the plaza would be reduced from 175 to 160 feet from east to west and from 120 to 108 feet from north to south. Flagstones removed from the reduction in size of the plaza would be used to pave over the space previously occupied by the tree planters. Seasonal plantings would be added around the outer perimeter of the central plaza, and seating options would be added to the inner edge of the central plaza (Figure 2.9).

Figure 2.9 – Alternative 3



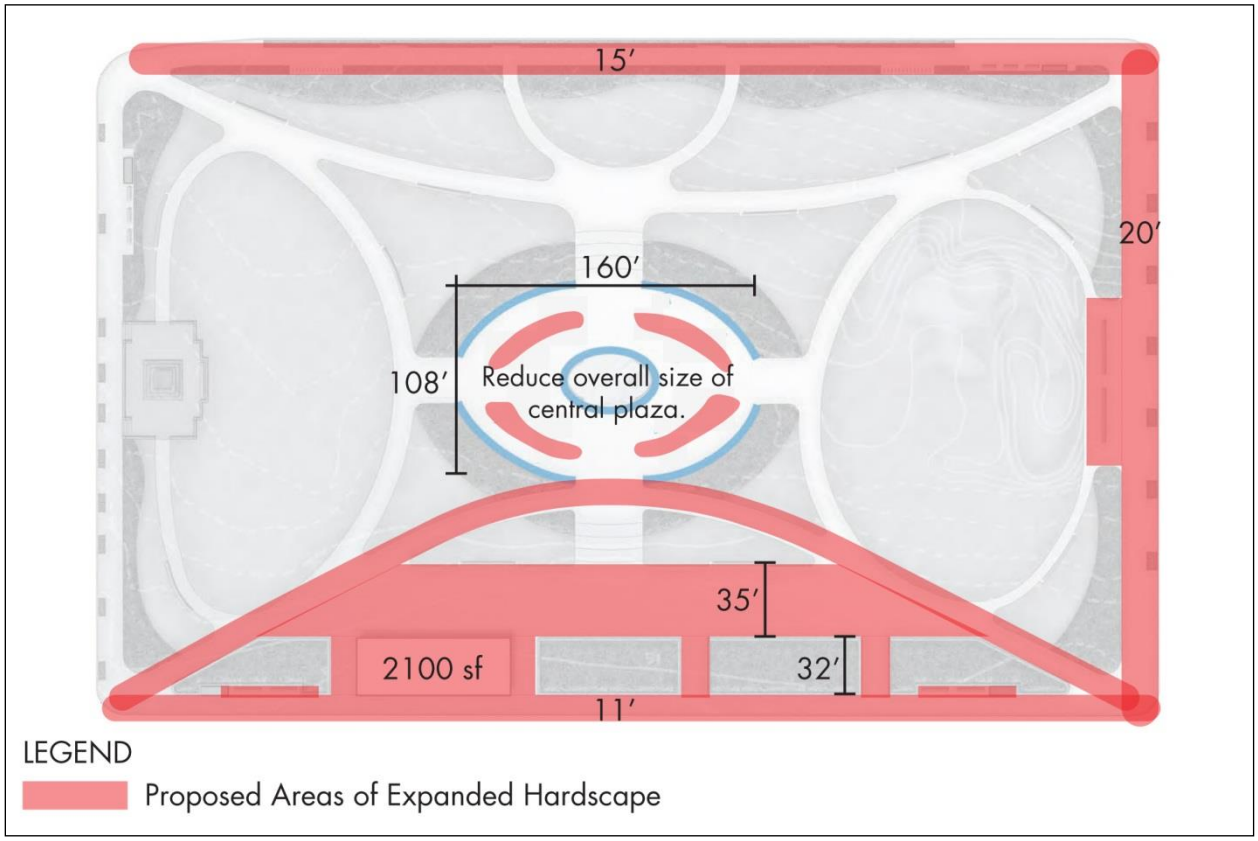
CENTRAL WATER FEATURE

Under this alternative, the design of the interactive fountain would be in keeping with the shape and form of the existing fountain. The new fountain would also retain some of the historic fabric of the existing fountain, where possible such as the historic sandstone coping and the flagstones on the central plaza. The coping of the redesigned fountain could be raised to provide additional seating. Design elements such as an outside ring of jets that could spout water into the central fountain would provide an interactive element to pedestrians on the plaza and would provide flexibility for event space when jets are turned off.

HARDSCAPE

Alternative 3 would add a rectangular, up to 40-foot-wide pedestrian mall along the southern edge of the site. The pedestrian mall could be converted to formalized space for events and tenting as needed. A historical timeline engraving, pertinent to the park's history, could be added to the pedestrian mall. Planters, separated by access points, would border the south side of the pedestrian mall and a new curvilinear walk would be constructed north of the mall, providing pedestrian access to the center plaza. Seasonal plantings would be added around all edges of the park. Engravings or signage delineating the history of water use and park history could be added along the northeastern pathway. The fabric of the remaining internal pathways in the park would be rehabilitated, and the turf damaged by the existing social trails would be restored. For this alternative, the amount of soft surface in the park would be 113,000 square feet, and the amount of hardscape would be approximately 93,000 square feet (Figure 2.10).

Figure 2.10 – Alterative 3 Proposed Additional Hardscape



CAFÉ AND BASIC AMENITIES

Under Alternative 3, up to a 2,200-square-foot café would be added to the southern edge of the park. The café would be positioned just off center on this north to south central axis, closer to the west side. The café building would also house basic amenities such as maintenance space, an information booth, and restrooms.

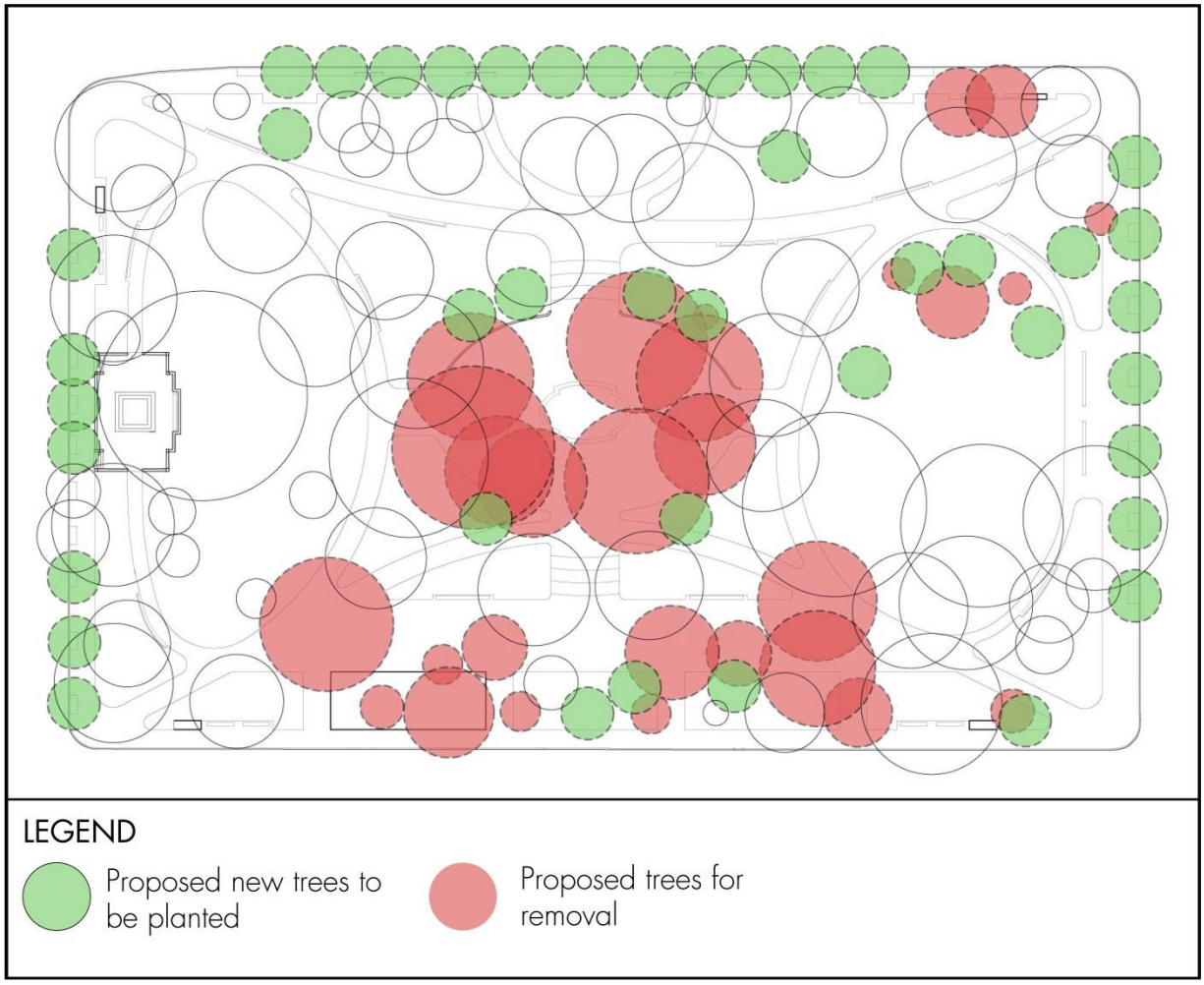
PLAY AREAS

Under Alternative 3, up to a 12,000-square-foot children's play area and tot lot would be added to the northern part of the east lawn (see Figure 2.9). The construction of the play area would require slight regrading of the site. The joint play area and tot lot would be fenced off from the surrounding park visitors. The play area would be designed using natural materials to be compatible with the landscape of the park and could include rocks, logs, and other landscape and topographic features.

TREE CANOPY

Under Alternative 3, 27 trees would be removed in addition to the 17 unhealthy trees recommended for removal, including seven historic trees that were planted prior to 1936. Forty-three young trees would be replanted resulting in tree canopy cover of 63% of the total park area (see Figure 2.11 for more detail and placement of trees).

Figure 2.11 – Alternative 3 Trees Canopy



Construction

Construction would be performed on an optimized schedule to limit park closures and is estimated to last approximately one year. Funding availability would determine construction timing.

Mitigation Measures for the Action Alternative

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

SOILS

- Best management practices for erosion and sediment control would be employed during and after construction, including stabilization and re-vegetation after construction is completed. Best management practices would include:

- During construction, exposed soils would be covered with plastic sheeting, jute matting, erosion netting, straw, or other suitable cover material to prevent soil erosion and movement during rain or wind events.
- Erosion containment controls, such as silt fencing and sediment traps (e.g., hay bales), would be used to contain sediment onsite.
- Replacement soil, which would be brought in from elsewhere, would not come from pristine sites and would be salvaged, in accordance with NPS policy.

VEGETATION

- The NPS would protect the root zones of mature trees within the construction zone by placing fencing around the perimeter of the trees to prevent heavy equipment from compacting the roots or causing damage to the bark

WATER RESOURCES

- To mitigate against short-term adverse effects during construction, sediment and erosion control measures, as referred to above under soils, would be implemented to prevent sediment runoff into adjacent water bodies or nearby storm sewers.
- The selected alternative would be in compliance with EISA 438 and all local regulations for stormwater. Specific mitigation measures would vary based on the overall increase or decrease in impervious surface and would be completed during the design phase. Long-term stormwater management measures examples include permeable pavement, bioretention, infiltration, stormwater harvesting or storage, disconnection of impervious surfaces, and tree planting.

VISITOR USE AND EXPERIENCE

- Public information would be made available on the park website and on signs in the park to inform visitors of temporary closures within the project area.
- Interpretation and education information would be added onsite to notify visitors of the project, its effects on natural and cultural resources, and the NPS's tenets of sustainability.
- Construction would be phased to allow the park to remain partially open during construction.

CULTURAL RESOURCES

- Throughout the design process, the NPS would continue to consult with cooperating agencies and consulting parties to ensure adverse effects on cultural resources are avoided, minimized, and mitigated to the maximum extent possible. A Memorandum of Agreement would be completed with the DC SHPO for the preferred alternative.
- Impacts to the cultural landscape would be minimized by following *The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes*, which would inform decisions to minimize the impacts to cultural landscapes and by ensuring that the operation and construction of a café facility is conducted in a manner consistent with these standards (Birnbaum 1996).
- If archeological resources are discovered during construction, all work in the immediate vicinity of the discovery would be halted until the resources could be identified and documented and an appropriate mitigation strategy could be developed. Consultation with the NPS, and/or the NPS regional archeologist and the DC SHPO would be coordinated to ensure that the protection of resources is addressed. In the unlikely event that human remains, funerary objects, sacred objects, or objects of cultural patrimony were discovered during construction, provisions outlined in the

Native American Graves Protection and Repatriation Act (25 USC 3001) of 1990 would be followed.

- Under Alternative 3, the replacement trees for the 17 trees in poor condition could be planted surrounding the central plaza to maintain a sense of space.

TRAFFIC AND TRANSPORTATION

- There would be no road closures during peak hours.
- As part of the construction permitting process, the contractor would submit traffic control plans to the NPS for review and approval prior to the implementation of any changes. The traffic control plans will include measures, such as detour signs, to safely divert traffic during temporary off-peak closures.
- During construction, trucks would deliver materials and remove debris during off-peak hours. The timing would be coordinated with the park to reduce impacts on traffic and transportation in the project area.

PUBLIC SAFETY AND ACCESSIBILITY

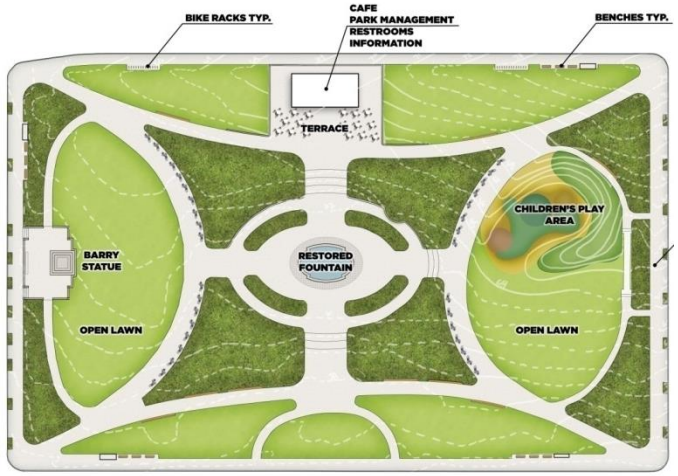
- Construction workers and employees would follow an approved health and safety plan that incorporates all applicable regulations.
- Barriers and signs would be used around construction sites to divert the public from potentially dangerous situations.
- Announcements would be made on the park website and in the media to alert the public to the construction schedule and locations.

Alternatives Considered but not Carried Forward for Detailed Analysis

Several alternatives or alternative elements were identified during the design process and internal and public scoping. Some of these were determined to be excessive, or much less desirable than similar options included in the analysis, and were therefore not carried forward for analysis in this EA. Justification for eliminating alternatives from further analysis was based on factors relating to:

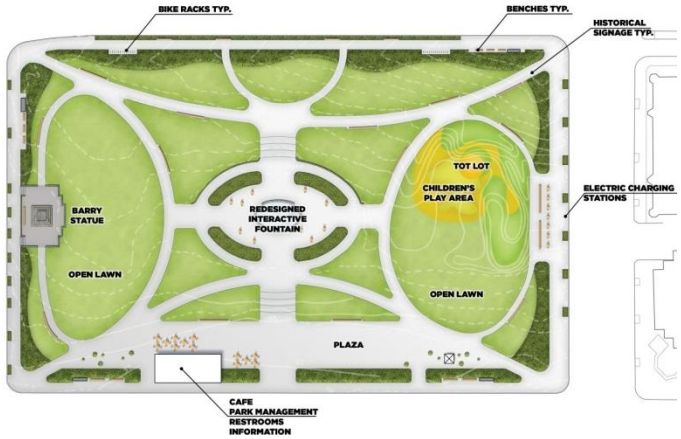
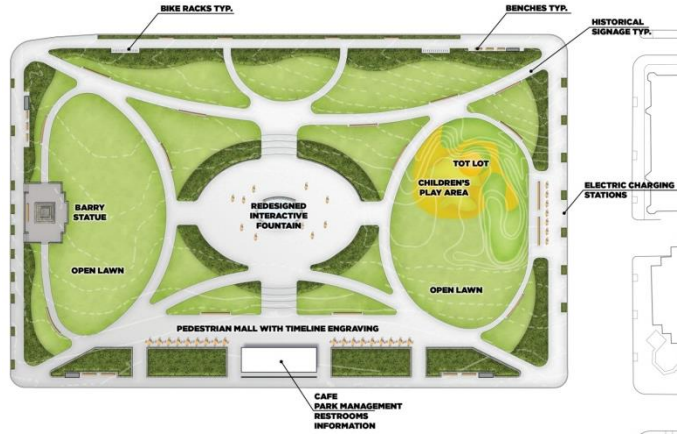
- technical or economic infeasibility
- inability to meet project objectives or resolve project need
- duplication with other less environmentally damaging or less expensive alternatives
- conflict with the statement of purpose and need or other policies
- impacts that were too severe on environmental or historic resources.

Table 2.1 – Alternatives Considered, but Dismissed from Further Analysis

Alternative	Description	Basis For Dismissal
Center A – Square North Plaza 	Similar to Alternative 2, this alternative would add a terrace to the central northern side of the park. The plaza would be square in shape. This alternative would also add seasonal plantings covering the entire area of the four small lawn areas created by the intersection of the curvilinear north to south and east to west pathways. Under this alternative, seasonal plantings would be added filling the turf panels along the east and west sides of the park. The Commodore John Barry statue would be shifted to the eastern edge of its plaza and turned to face the park.	This alternative is similar to Alternative 2, Option A and B, but it would alter the shape of the semi-circular turf panel located on the northern edge of the park. In addition, the seasonal plantings added under this alternative would remove large turf areas making them unusable for recreational activities. Moving and turning the Commodore John Barry statue would result in unnecessary adverse impacts to cultural resources. Because Alternative 2 would not alter the shape of the semi-circular turf area and would maintain the open turf panels, the Center A – Square North Plaza alternative was eliminated from further consideration.
Center B – Square North Plaza with Cafe 	This alternative is similar to Center A – Square North Plaza; however, this alternative would add a café to the square terrace to the central northern side of the park. The same seasonal plantings would be added as under the Center A – Square North Plaza. The Commodore John Barry statue would be shifted to the eastern edge of its plaza and turned to face the park.	This alternative is also similar to Alternative 2, Option B, but it would alter the shape of the semi-circular turf panel located on the northern edge of the park. In addition, the seasonal plantings added under this alternative would remove large turf areas making them unusable for recreational activities. Moving and turning the Commodore John Barry statue would result in unnecessary adverse impacts to cultural resources. Because Alternative 2 would not alter the shape of the semi-circular turf area and would maintain the open turf panels, the Center B – Square North Plaza with Cafe alternative was eliminated from further consideration.

Alternative	Description	Basis For Dismissal
The Edge – Large Southern Plaza and Rill Water Feature 	This alternative would retain the shape of the existing central plaza and four tree planters. A large plaza would be added to the southern edge with four narrow planters creating a border between the park and I Street NW. Café and restrooms would be added to the southwestern edge of the new plaza and park management/information booth facility would be added to the southeastern side of the new plaza. A rill water feature would be added to the semi-circle of turf on the central northern edge of the park running to the southeast through the turf panels and ending in the children's play area on the eastern ellipse lawn. The Commodore John Barry statue would be shifted to the eastern edge of its plaza and turned to face the park.	This alternative is similar to Alternative 3, but as it adds more hardscaping which would have a more severe visual impact to the southern edge. In addition, the separation of the café/restrooms and park maintenance would create additional visual impact. Moving and turning the Commodore John Barry statue would result in unnecessary adverse impacts to cultural resources. Because Alternative 3 would have less of a visual impact both in terms of the amount of hardscape added and size and location of the café embedded in the planters, the Edge – Large Southern Plaza and Rill Water Feature alternative was eliminated from further consideration.

Alternative	Description	Basis For Dismissal
The Diagonal, including West Café and North Barry Statue option 	This alternative included two variations, with and without a West Café and North Barry option. One option would move the Commodore John Barry statue to the central northern edge of the park, removing the semi-circular turf panel. A café, restrooms, and park maintenance facility would be added to the southern portion of the west edge of the park. The Commodore John Barry statue plaza would be converted to café seating. A large children's play area with play element would be added to the eastern lawn.	Both variations of this alternative would have significant adverse impacts on cultural resources as it would move the Commodore John Barry statue to a completely new location and alter the symmetry of the western edge of the park by adding hardscaping and a café. Under the second option, alterations made to the contributing features of the park would severely diminish the integrity of contributing landscape features, resulting in a loss of integrity of the cultural landscape as a whole. Under this alternative, the park's circulation system and spatial organization would be substantially compromised through the alteration of the internal pathways. The open lawn on the east side of the park and over half the existing pre-1936 trees would be lost. The 1936 fountain would be removed, and the new water feature would not incorporate design features or the historic fabric of the existing fountain. The new café structure would be added to the center of the park's southern edge, blocking historic views towards the fountain. Small-scale features would be lost and altered through the loss of the existing benches. As a result, this alternative was dismissed from consideration.

Alternative	Description	Basis For Dismissal
The Edge A – Southern Plaza 	This alternative adds a large plaza to the southern edge of the park. A café, restrooms, and park maintenance facility would be embedded in a narrow planter on the southwestern corner of the park.	This alternative is similar to Alternative 3, but as it adds more hardscaping and does has narrower planters, it would have a more severe visual impact to the southern edge. Because Alternative 3 would have less of a visual impact both in terms of the amount of hardscape added and size and location of the café embedded in the planters, the Edge A – Southern Plaza alternative was eliminated from further consideration.
The Edge B – Southern Pedestrian Mall with Center Cafe 	This alternative is similar to Alternative 3, but the café, restrooms, and park maintenance facility would be placed centrally along the southern edge of the park.	This alternative is similar to Alternative 3, but the central location of the café impacts views towards the central plaza. Because Alternative 3 would not block views to the central plaza, the Edge B – Southern Pedestrian Mall with Center Cafe alternative was eliminated from further consideration.

The NPS Preferred Alternative: Alternative 3 The Edge

The CEQ Section 5.4 (d) requires the park to identify a preferred alternative in the EA if one has been identified. The preferred alternative is the alternative the NPS believes would best accomplish its goals, objectives, and purpose and need. In selecting a preferred alternative, the NPS must consider the associated impacts to natural and cultural resources.

NPS and the partners compared the advantages of each alternative and determined the Edge to be the preferred alternative. The Edge alternative best protects and improves existing resources within Franklin Park. The Edge improves visitor services and operational efficiency and best meets the purpose and need of the project.

Environmentally Preferable Alternative

The NPS is required to identify the environmentally preferable alternative in its NEPA documents for public review and comment (NPS 2001b). According to the CEQ regulations implementing the NEPA (43 CFR §46.30), the environmentally preferable alternative is the alternative "that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources." The environmentally preferable alternative is identified upon consideration and weighing by the responsible official of long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources. In some situations, such as when different alternatives impact different resources to different degrees, there may be more than one environmentally preferable alternative.

Alternative 2, the Center, is the environmentally preferred alternative because it has the least impact on historic, cultural, and natural resources. Alternative 2 also has the least impact to soils of the action alternatives because there would be no changes to the landscape beyond the addition of the small, paved area on the east side and the impacts from the smaller, 9,000-square-foot play area. In addition, Alternative 2, both options A and B would remove the least amount of trees and avoid removing the tree ring on the central plaza, which is a contributing historic feature. Finally, this alternative would restore the historic central fountain in keeping with the original form and shape.

The No Action Alternative would impact cultural landscapes/historic districts and structures because of the aesthetically deficient and failing historic central plaza fountain. In addition, the No Action Alternative would not restore the turf areas that have been impacted by social trails.

Summary of Impacts

Table 2.2 on the following pages provides a summary of environmental consequences for each resource area analyzed in "Chapter 4: Environmental Consequences." There would be no impairment to any of the resources resulting from the implementation of the action alternatives. Options are determined to have beneficial or adverse impacts for each area of analysis, and adverse impacts are rated as negligible, minor, moderate, or major. Impacts are also assessed as to whether they are short-term (less than a year in duration) or long-term (greater than a year in duration). Threshold definitions for each topic are provided in Chapter 4.

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Table 2.2 – Summary of Impacts (Environmental Consequences)

Resource Area	Alternative 1: No Action Alternative	Alternative 2: The Center	Alternative 3: The Edge
Soils	Implementation of the No Action Alternative would result in long-term minor adverse impacts to soil resources due to continued compaction and erosion of soils from visitor use and maintenance activities, causing further erosion and exposure. No cumulative impacts to soils are expected.	The construction and operation of the café building, hardscape areas, utility trenching, and plantings would cause overall loss of soil productivity in the footprint of the sites resulting in long-term minor adverse impacts. The establishment of a play area could lead to an increase in foot traffic at the site, potentially resulting in long-term minor adverse impacts from use. No cumulative impacts to soils are expected.	The construction and operation of the café building, hardscape areas, utility trenching, and plantings would eliminate soil productivity in the footprint of the sites, resulting in long-term minor adverse impacts. The establishment of a play area and tot lot could lead to an increase in foot traffic at the site, potentially resulting in long-term minor adverse impacts from use. No cumulative impacts to soils are expected.
Vegetation	The implementation of the No Action Alternative would result in long-term negligible adverse impacts due to remaining unhealthy trees and vegetation affected by visitor use. There would be no cumulative impacts on vegetation under the No Action Alternative.	The implementation of Alternative 2 would result in the loss of a small amount of turf and the overall loss of canopy cover of 1 to 3%. Although mature trees could potentially be removed, this alternative would involve planting of new trees. Additionally, seasonal plantings would be added to the center plaza. Therefore, impacts to vegetation would be long-term minor adverse. There would be no cumulative impacts on vegetation under Alternative 2.	The implementation of Alternative 3 would result in the loss of turf and the loss of canopy cover of 11%. Impacts to vegetation would be short-term and long-term minor adverse. There would be no cumulative impacts on vegetation under Alternative 3.
Visitor Use and Experience	Under the No Action Alternative, visitor experience would continue to be affected by the deterioration of the aesthetic to the park caused by the social trails and deteriorating fountain, and the imbalance of shading due to the current tree canopy cover. As a result, there would be a long-term negligible to minor adverse impact to visitor experience and continued long-term beneficial impacts to visitor use. Combined with other developments in the project area, there would be long-term beneficial cumulative impacts.	Under Alternative 2, there would be short-term minor adverse impacts during construction due to the park's partial closure to visitors. However, in the long-term, there would be beneficial impacts to visitor use and experience due to the rehabilitation of the central water feature, the addition of hardscaping, the creation of a more balanced tree canopy, and potential addition of a café on the north side of the park. Combined with other development projects in the study area, Alternative 2 would have long-term beneficial cumulative impacts to visitor use and experience.	Under Alternative 3, there would be short-term minor adverse impacts during construction. In the long-term, impacts to visitor use and experience at the park would be beneficial due to the addition of seasonal plantings, a play area, and café as well as the rehabilitation of the central water fountain and hardscaping throughout the park. In combination with the long-term beneficial impacts from other development and transportation projects in the area, there would be long-term beneficial cumulative impacts to visitor use and experience.
Cultural Resources	The No Action Alternative would result in long-term minor adverse impacts to cultural landscapes/historic districts and structures due to the deterioration of the lawns caused by social trails and the continuing decline in the condition of the 1936 fountain. The cumulative impact of these projects, when combined with the long-term minor impact of the No Action Alternative would be long-term minor adverse, or no adverse effect under Section 106.	Alternative 2 would result in long-term moderate adverse impacts to historic districts and structures/cultural landscapes. The integrity of several landscape features would be slightly diminished, yet the Franklin Park cultural landscape would retain sufficient overall integrity. The cumulative impact of these projects, when combined with the long-term minor impact of the No Action Alternative would be moderate long-term adverse, the equivalent of adverse effect under Section 106.	Alternative 3 would result in long-term moderate adverse impacts to historic districts and structures/cultural landscapes. The integrity of several landscape features would be diminished, and the overall integrity of the Franklin Park cultural landscape would be lessened. These impacts would be mitigated through the development of a Section 106 agreement document in consultation with the Section 106 consulting parties. The cumulative impact of these projects, when combined with the long-term minor impact of the Alternative 3, would be long-term moderate adverse, the equivalent of adverse effect under Section 106.
Public Safety and Accessibility	The No Action Alternative would have long-term minor adverse impacts on human safety and accessibility from continued deteriorating conditions and perceived safety concerns. When combined with the overall long-term minor adverse and beneficial impacts from the cumulative actions, the No Action Alternative would have long-term minor adverse and beneficial cumulative impacts.	Alternative 2 would result in short-term minor adverse impacts during construction and long-term beneficial and minor adverse impacts on safety and accessibility at Franklin Park due to improved perceptions of safety and visibility, but lack of improved accessibility to the central plaza. When combined with the overall long-term minor adverse and beneficial impacts from the cumulative actions, Alternative 2 would have long-term minor adverse and beneficial cumulative impacts to public safety and accessibility.	Alternative 3 would result in short-term minor adverse impacts during construction and long-term beneficial impacts on safety and accessibility at Franklin Park due to improved perceptions of safety and visibility and improved access to the central plaza. When combined with the overall long-term minor adverse and beneficial impacts from the cumulative actions, Alternative 3 would have short-term minor adverse and long-term beneficial cumulative impacts to public safety and accessibility.

Resource Area	Alternative 1: No Action Alternative	Alternative 2: The Center	Alternative 3: The Edge
Park Management and Operations	The No Action Alternative would have long-term negligible adverse impacts on park operations and management as a result of continued maintenance activities. Cumulative impacts would result in long-term negligible adverse impacts to the local area as a result of increased visitation and the corresponding increase in maintenance.	Construction activities would result in short-term negligible adverse impacts. However, there would be long-term beneficial impacts on park operations and management because of the improvements made to the fountain and reduction in turf and tree maintenance required. The increase in amenities and associated staffing and maintenance needs would result in long-term minor adverse impacts to park management and operations. Cumulative impacts would result in long-term minor adverse impacts to the local area as a result of increased visitation and the corresponding increase in maintenance.	Same as Alternative 2.

CHAPTER 3: AFFECTED ENVIRONMENT

This chapter describes existing environmental conditions in the areas potentially affected by the alternatives evaluated, including soils, water quality, visitor use and experience, cultural resources (cultural landscapes and historic structures and districts), land use, socioeconomics, traffic and transportation, public safety, and park management and operations. Potential impacts are discussed in "Chapter 4: Environmental Consequences" in the same order.

Soils

Originally, much of Washington, D.C., and the National Mall, because of their proximity to the Potomac River and Tiber Creek, were made up of swamplands and tidal marshes and marked by their drainage systems. During the mid- to late-19th century, the main channel of Tiber Creek was replaced by a trunk sewer, and the area was filled to create buildable land, which now encompasses much of downtown Washington, D.C., and portions of the National Mall, including Franklin Park (Wagner 2007).

The USDA Natural Resource Conservation Service's Soil Survey of the District of Columbia was used to identify soils in Franklin Park. The soils in the project area and throughout much of the National Mall are classified as udorthents, a soil type heavily influenced by human activities and characterized by earthy fill material that has been placed in poorly to excessively drained soils on uplands, terraces, and floodplains of the Coastal Plain and Piedmont (USDA 1976).

As a result of previous disturbance and development associated with human activities, udorthents are typically composed of an assortment of fill materials causing a wide variety of physical and chemical soil properties. In Franklin Park, the udorthents topsoil is composed primarily of sandy loam with other loam and silt loam. However, the udorthents subsoils are much more variable, and soil permeability, runoff, and erosion potential appear to be somewhat varied within Franklin Park (USDA 2013). In addition to naturally occurring soil erosion, intensive visitor use and development within Franklin Park have resulted in highly compacted soils. Highly compacted soils decrease soil permeability and increase the potential for further soil erosion. Furthermore, social paths and other bare areas have formed, which have caused an increase in soil erosion because there is no grass over these areas to decrease the rate of runoff or encourage infiltration (NPS 2014b). Soils surrounding Franklin Park are classified as urban land, which is defined as soils and areas that have been predominantly developed and consist of nearly level to moderately sloping areas that are more than 80% covered by impervious surfaces such as asphalt, concrete, and structures (USDA 1976).

Vegetation

The vegetated landscape of Franklin Park consists of large areas of lawn and canopy trees of varying ages. Trees are interspersed along most of the park perimeter within grassed areas except for a small portion of the eastern side. Tree boxes containing street trees are present along 14th Street NW. Although originally various shrubs, hedges, flowers, and other ornamental plantings were part of the park vegetation, currently there are no shrubs or other understory plants.

Large lawn panels are located on the east and west sides with smaller areas to the north and south. Currently, much of the lawn is shaded by the existing tree canopy. Larger portions of unshaded lawn exist in the northeast and southwest corners of the park, and smaller areas are scattered in the north. Worn grass and erosion of the lawn is evident throughout but especially along the perimeter of the park and underneath tree canopies. Grass is also absent along social trails and adjacent to areas where people congregate (e.g., bus stops and along the food truck areas on 13th Street NW) resulting in bare, compacted soil. Eroded lawn could be due to the indirect effects of shading from the mature tree canopy and direct

impacts from stormwater drainage issues or the ongoing wear and tear of use by larger groups of people (NPS 2011).

Franklin Park supports 23 tree species of which 21 are deciduous and two are evergreen. Many of these species are the same as those present in the 1930s (NPS 2011). The total tree count in 2013 was 105 with 18 trees planted in 1935 or earlier and 16 planted in 1946 (NPS 2013a; Wiles Mensch Corporation 2013). Although the ideal age distribution consists of a greater percentage of younger trees and a smaller percentage of older trees, mature trees in Franklin Park account for 37 percent of the total compared to 20 percent for younger trees. Deciduous trees include European beech (*Fagus sylvatica*), tulip poplar (*Liriodendron tulipifera*), cucumber tree (*Magnolia acuminata*), saucer magnolia (*Magnolia x soulangiana*), Southern crabapple (*Malus angustifolia*), London planetree (*Platanus acerifolia*), white oak (*Quercus alba*), Northern red oak (*Quercus borealis*), laurel oak (*Quercus imbricaria*), overcup oak (*Quercus lyrata*), willow oak (*Quercus phellos*), Japanese pagoda tree (*Sophora japonica*), little-leaf linden (*Tilia cartada*), American elm (*Ulmus americana*), Wych elm (*Ulmus glabra*), and Japanese zelkova (*Zelkova serrata*). The evergreen is Atlantic blue cedar (*Cedrus atlantica*). Several of these species are ornamental, including Atlantic blue cedar, European beech, saucer magnolia, London planetree, Japanese pagoda tree, little-leaf linden, Wych elm, and Japanese zelkova. Of these species, the Japanese pagoda tree, little-leaf linden, and Japanese zelkova are the most numerous, and together these individuals comprise almost 33% of the total trees within Franklin Park. There is no non-native, invasive vegetation in the project area.

The tree canopies within Franklin Park shade 74 percent of the park area and pervious area covers approximately 145,000 square feet (NPS 2014a). The existing trees are mainly located along park boundaries, walkways, and the central plaza, with some interspersed on the lawn areas. Fairly uniform tree spacing exists along the north and west boundaries with less uniform spacing on the south and east. Three of the four planting areas surrounding the main central plaza, originally held three willow oaks, but now have only two each. The evergreen species are found at each of the park corners with three larger individuals located in the northeast. Tree species with conspicuous flowers include tuliptree, cucumber tree, saucer magnolia, flowering crabapple, Japanese pagoda tree, American linden, littleleaf linden, and silver linden and these are scattered throughout the park.

Soil compaction surrounding trees and rodent disturbance of tree roots is degrading the health of some existing trees. A survey of tree health determined that more than two-thirds of existing trees are in fair condition, approximately one-third are in poor condition, and only a few individuals are in very poor condition (NPS 2014b). No trees were rated as being in good to excellent health. Of those in very poor condition, the majority were planted either pre-1935 or in 1946. An NPS arborist has recommend the removal of 17 trees that are in poor to very poor health under the action alternatives.

Visitor Use and Experience

The project area is located at Franklin Park within the National Mall and Memorial Parks unit of the NPS, which encompasses the monumental core in downtown Washington, D.C., including 150 reservations, circles, and urban park spaces. Franklin Park is adjacent to the McPherson Square Metro Station and a short walk from McPherson Square, Lafayette Square, and the White House.

Many elements contribute to the project area's popularity and inform visitor use and visitor experience, both of which are addressed separately within this analysis. Visitor use describes the multiple ways in which a site is used. In this context, Franklin Park is a passive green space that is used as a circulation thoroughfare and a recreational space. Visitor experience is the overall perception of a place and is, in this context, informed by things such as adjacent functions, public access, and visual quality.

VISITOR USE

There are no annual visitation counts for the park, but pedestrian visitor use counts were performed by the DCOP and the DowntownDC BID for this project on Friday June 21, Tuesday June 25, and Saturday June 29, 2013. Counts were performed in 15-minute increments during both the lunchtime and evening rush on Friday June 21 and Tuesday June 25. The lunchtime counts took place between 11:30 a.m. and 1:30 p.m. and the evening counts took place between 4:30 p.m. and 7:15 p.m. A substantially larger number of visitors were observed during the weekdays with 1,976 visitors during the lunchtime rush on Friday June 21, and 1,428 visitors on Tuesday June 25, compared to 311 visitors on Saturday June 29, during the same time period (DCOP 2013a). Visitor use peaked in the park during the lunchtime rush from noon to 1:00 p.m. on both weekdays, with 404 visitors from 12:30 p.m. to 12:45 p.m. on Friday June 21, and 260 visitors from 12:15 p.m. to 12:30 p.m. on Tuesday June 25 (DCOP 2013a). Visitor use was fairly consistent, although limited compared with the weekdays, throughout lunchtime on Saturday June 29, peaking at 48 visitors from noon to 12:15 p.m. The evening rush hour occurred between 5:00 p.m. and 6:00 p.m. on both weekdays, peaking at 155 visitors from 5:30 p.m. to 5:45 p.m. on Friday June 21, and at 205 visitors during the same time period on Tuesday June 25 (DCOP 2013a).

Pedestrian visitor use counts also observed stationary visitor activities in the park and recorded a variety of activities, including standing, sitting on benches or other surfaces, lying down, children playing, visitors walking their dogs, visitors eating lunch, or visitors performing other recreational activities. Predominant activities during all visitor count periods included sitting on benches or other surfaces, standing, and/or eating.

In addition to visitor use counts, visitor surveys were completed to gain a better sense of how visitors are currently using the park. A total of 127 surveys were completed during the day between the hours of approximately 9:30 a.m. and 3:45 p.m. on Wednesday July 10, Thursday July 11, and Monday July 15, 2013. Those surveyed indicated that they predominantly access the park on their own, although some visitors come in small groups. A majority of the visitors surveyed also indicated that they access the park almost daily, with the second largest group responding that they access the park once or twice a week. The majority of visitors expressed that they use the park to eat lunch outside or as a throughway, simply walking through it to access areas on the opposite sides. Others expressed that they use the park to socialize or wait for their bus (DCOP 2013b).

VISITOR EXPERIENCE

The park is surrounded by commercial offices, hotels, restaurants, retail, the historic Franklin School, and the Almas Temple. Numerous food trucks park along the park side of 13th Street NW during the day. The interior of the park is composed of several terraced turf expanses enclosed within a quadrangle of arched, interconnected pathways each lined with benches and trash cans. A large plaza and fountain occupy the center of the park, and a statue honoring Commodore John Barry is located on the west side of the park.

The park is well served by multiple modes of transportation, and visitors have access to and from the project area via the McPherson Square Metrorail station, Metrobus, DC Circulator, various commuter busses, Capital Bikeshare, a city-wide bikeshare program, and by car. According to the visitor surveys, visitors reported primarily accessing the park by walking.

Franklin Park is popular with visitors because it provides a centrally located open green space for tourists, locals, and surrounding office workers, as well as an abundance of food truck choices (DCOP 2013b). Visitor complaints include of a lack of amenities, safety issues, poor aesthetics and appearance, and lack of cleanliness (DCOP 2013b). Visitor amenities in the park include painted, wooden slat benches with cast iron legs, trash receptacles, and ‘Saratoga’ style light fixtures.

Cultural Resources

CULTURAL LANDSCAPES AND HISTORIC STRUCTURES & DISTRICTS

Cultural resources for federal agency planning and environmental review purposes are primarily those resources that qualify for the NRHP, as well as those addressed by certain other laws protecting archeological sites and Native American properties. The NHPA is the principal legislative authority for managing cultural resources associated with NPS projects. Generally, Section 106 of the NHPA requires all federal agencies to consider the effects of their actions on cultural resources listed in or determined eligible for listing in the NRHP. Such resources are also termed "historic properties."

Moreover, the federal agency must afford the ACHP the opportunity to comment in the event that an undertaking will have an adverse effect on a cultural resource that is eligible for or listed in the NRHP and must consult with the DC SHPO and other interested parties in an effort to avoid, minimize, or mitigate adverse effects.

Eligibility for the NRHP is established according to the official Criteria of Evaluation (36 CFR 60.4) issued by the Department of the Interior. The criteria relate to the following:

The quality of significance in American history, architecture, archeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

A. that are associated with events that have made a significant contribution to the broad patterns of our history; or

B. that are associated with the lives of persons significant in our past; or

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

D. that have yielded, or may be likely to yield, information important in prehistory or history.

Other important laws and regulations designed to protect cultural resources are:

- Native American Graves Protection and Repatriation Act, 1990
- American Indian Religious Freedom Act, 1978
- NEPA, 1969
- Archeological Resources Protection Act, 1979
- EO 11593: *Protection and Enhancement of the Cultural Environment*, 1971

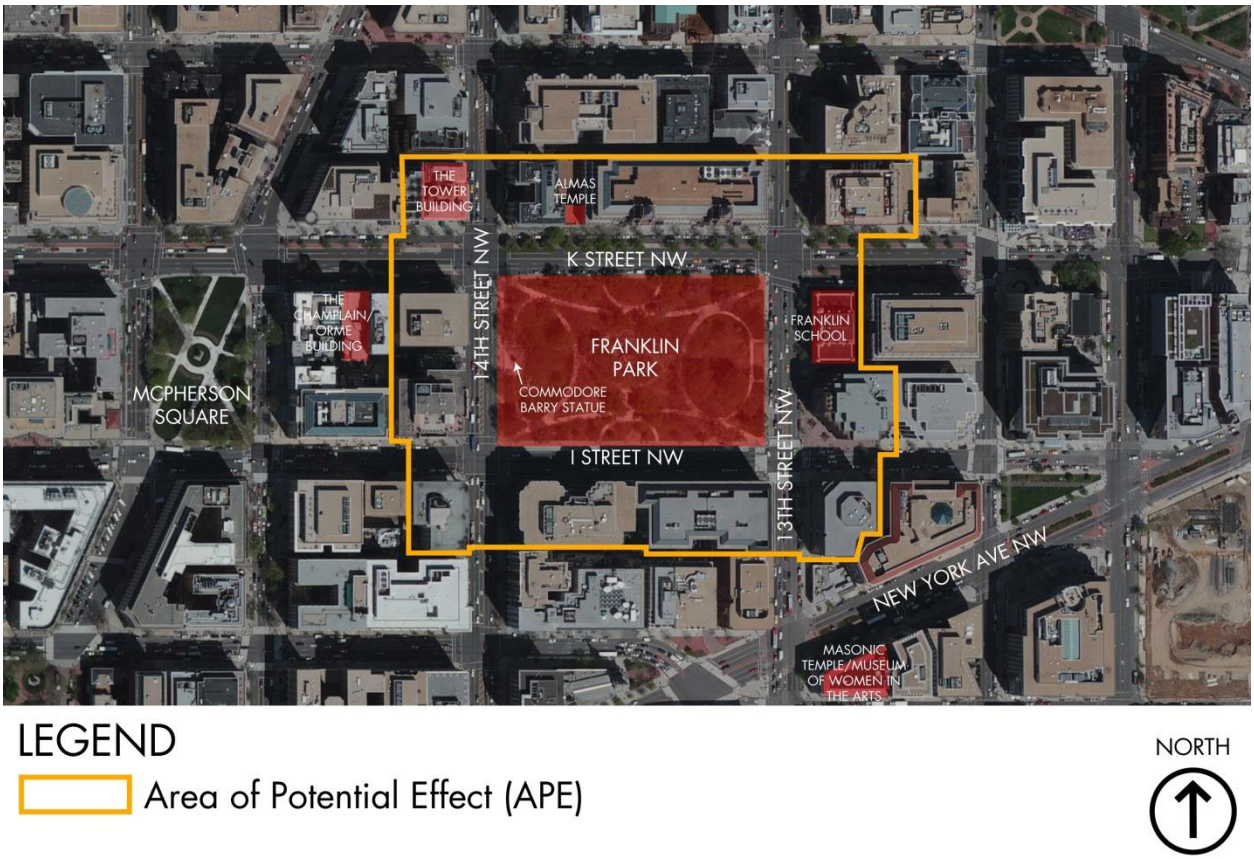
In addition, the NPS has a unique stewardship role in the management of its cultural properties, reflected in its own regulations and policies. In these policies, the NPS categorizes cultural resources as: archeological resources, cultural landscapes, historic districts and structures, museum objects, ethnographic resources, and Indian Trust resources and sacred sites.

As indicated in "Chapter 1: Purpose and Need," the project to revitalize Franklin Park has been evaluated as having no potential impact upon archeology, museum collections, ethnographic resources, or Indian Trust resources and sacred sites. Therefore, these impact topics have been dismissed leaving only cultural landscapes and historic structures/districts to be evaluated. Under the regulations implementing Section 106 of the NHPA (36 C.F.R. Part 800), the NPS has determined that the implementation of projects in a plan for the revitalization of Franklin Park would constitute an "undertaking" having a potential effect on NRHP resources. In brief, the park itself was recognized as a reservation that is a contributing feature of the "L'Enfant Plan of the City of Washington," a "structure" placed on the NRHP in 1997. However, its historic significance has been more extensively documented in a Cultural Landscape Inventory (CLI)

produced by the NPS in 2005 and updated in 2011. The latter 2011 CLI, which itself draws on a 1970 monograph entitled "Franklin Park, Washington, D.C." by George J. Olszewski and published by the NPS, is the primary source for the description of the affected environment for cultural resources in this EA (NPS 2011).

The NPS has assessed the undertaking's APE, i.e., whether it extends beyond boundaries of the park or even potentially underground, in the case of archeological resources. Based on consultation with the DC SHPO [and potentially other consulting parties as the process moves along], the draft APE includes the half block including "catty corner" blocks for all blocks around Franklin Park (Figure 3.1). This area includes no historic districts but two historic structures: (a) Franklin School, an 1869 building by Adolph Cluss listed on the NRHP and a National Historic Landmark (NHL) and (b) the relocated Moorish revival façade of the Almas Temple, a DC Landmark but presumably one ineligible for the NRHP (due to its relocation). All other buildings surrounding Franklin Park are approximately 12-story office buildings of roughly uniform height and of no historic significance. As indicated earlier, Franklin Park is also a contributing feature of the "L'Enfant Plan of the City of Washington," listed as a structure in the NRHP. Because the undertaking does not envision an alteration of the street alignments, reservations, or other features that constitute the components of that structure, it was not considered necessary to include the larger territory encompassed by the L'Enfant Plan within the APE.

Figure 3.1 – Proposed Draft APE



FRANKLIN PARK–HISTORY

The original tract of land north to Massachusetts Avenue on which the future Franklin Park would be laid out was called "Port Royal," owned by either Samuel Davidson, one of the District of Columbia's original proprietors, or John Davidson. In Pierre L'Enfant's 1791 Plan for the City of Washington, the future park appears as city square 291, but not as one of the 15 public squares intended for development

by U.S. states. In 1800, one house had been built on the square, said to be occupied by an "unidentified Frenchman" who cultivated a vegetable garden. In 1806, President Thomas Jefferson allowed the proprietor of Port Royal to enclose his property until the city needed to construct the public streets shown on L'Enfant's Plan, which would require their penetration through Port Royal.

The territory of the future park was largely woods mixed with swamp, but the springs present on the square led Congress to authorize the construction of two stream channels to bring fresh water to reservoirs near the White House. At this time, the square became known as Fountain Square. In 1822, $8,000 was appropriated by Congress for the purchase and enclosure of the square, which had previously been subdivided and sold to private owners. Grading of the parcel took place in 1851 and 1873. Development around the square and in the District of Columbia in general was slow in the early nineteenth century. Only the Eye St. block bordering "Franklin Square," the official designation since 1830, appears to have been developed according to an 1836 map. The Boschke "Topographic Map" based on surveys of the 1850s shows some additional structures around the other three bordering streets as well as an Eye Street that is almost entirely developed.

The improvement of Franklin Square was minimal — and not at all to the satisfaction of neighboring residential property owners — until after the Civil War, during which the square was used as an encampment for Union troops and suffered further degradation. Nonetheless, in 1866, a Victorian garden was planned by Colonel Benjamin French of the Office of Public Buildings and Grounds (OPBG) of the U.S. Army, the agency to which jurisdiction over public building and parks had just been transferred from the Interior Department. Later Engineer Officers who supervised the improvements of Franklin Square and other public spaces were Nathan Michler from 1867 to 1871 and Orville Babcock from 1871 to 1874, the latter period coinciding with that of the Territorial Government led by the corrupt but effective "Boss Shepherd." In the 1870s, drainage, gas lines for illumination, water lines, gravel walkways, plantings, and outdoor furniture all made their appearance. The Annual Report for 1868 (as quoted in the CLI) recounts:

> The undulating character of the surface will always add a great charm to its (Franklin Square's) appearance…A large number of trees of different species have been set out, and in the course of time various kinds of shrubbery will be planted. The grounds have already been under drained, and the paths substantially constructed…(there is a) dilapidated fence.

The park now helped attract the construction of Franklin School, a model public school, on adjacent 13th Street. The school was the fixture of an elite residential neighborhood and counted the children of three presidents as pupils. The houses, now demolished, of such post-Civil War notables as Senator John Sherman and former Secretary of War Edwin Stanton were located in the neighborhood.

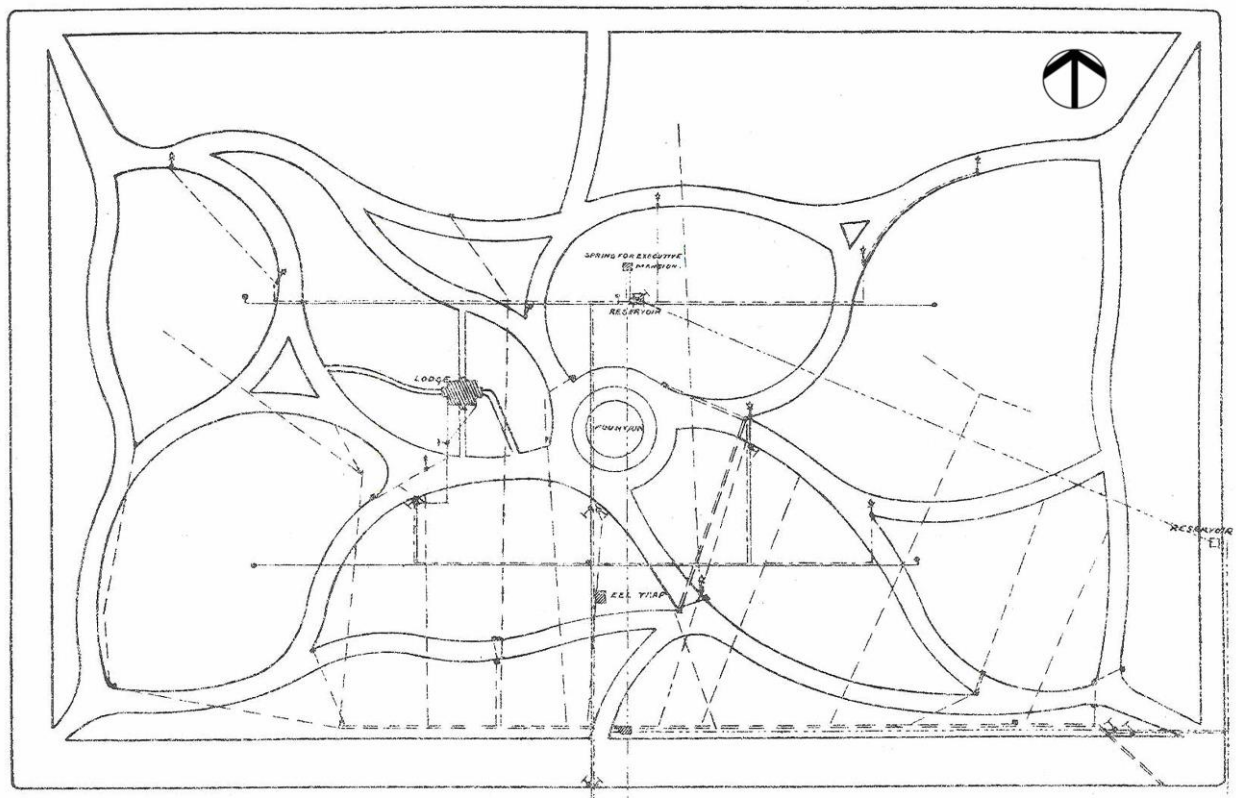
In 1867, a small park lodge was built. By 1872, an ornamental iron fence with four gates was erected around the park, and curving gravel walkways were installed. In this, as in many other aspects, the model for the development of Franklin Park was Lafayette Square north of the White House. It was under the control of the same public agency and inspired by the naturalistic landscape theories of Andrew Jackson Downing, Jr. Improvements to the public space around the park enclosure continued apace with brick sidewalks installed at the perimeter.

Near the center of the park, a fountain with a circular fountain bowl (later faced with red granite), surrounded by ornamental flower beds and fed by water piped in from the Potomac River, was erected. Also, a second lodge with urinals was built west of the fountain.

Although the basic Victorian *parti* remained throughout the late nineteenth century, significant changes continued to be made. Benches were replaced on a periodic basis with whatever the OPBG was buying for all its parks. Franklin Park served a brief period as an unofficial zoo accommodating a few animals that foreign diplomats had donated to the nation. Plantings were changed; trees replaced or transplanted; urns for specimen plants installed; and, perhaps, most notably, the iron fence enclosure removed in the hope of future granite curbing. The surfacing of walkways gravitated from gravel to asphalt and, in one

location, bluestone flagging. Nine electric arc lamps were installed, but existing gas lamps remained. The springs were closed to the public and then closed permanently on the eve of the Spanish-American War for fear that hostile agents might try to poison President William McKinley. Figure 3.2 shows the 1886 plan of the park in its irregular, curvilinear aspect (NPS 2011).

Figure 3.2 – 1886 Plan of Franklin Park



Source: NPS (2011)

The early twentieth century saw a gradual shift in both the infrastructure of Franklin Park as well as its social context. The neighborhood became more densely built up with the construction nearby of several hotels, restaurants, and theaters. The dense plantings of the Victorian era were no longer in favor and seen as suspect from the standpoint of public security. Congress wanted public parks in Washington to be more open and accessible. Franklin Park had lost its perimeter fence, but it was not until 1904 or so that it received quarter-round concrete, not granite curbing, with entrance posts for each of the eight entrances. In 1904, sod borders were laid, grass seed planted, and the brick gutters removed at the entrance to the walks. A hodgepodge of one old gas lamp, the electric arc lamps, and a whole new set of gas lamps illuminated the park from 1912 until 1922 when electric lamps replaced the gas lamps altogether.

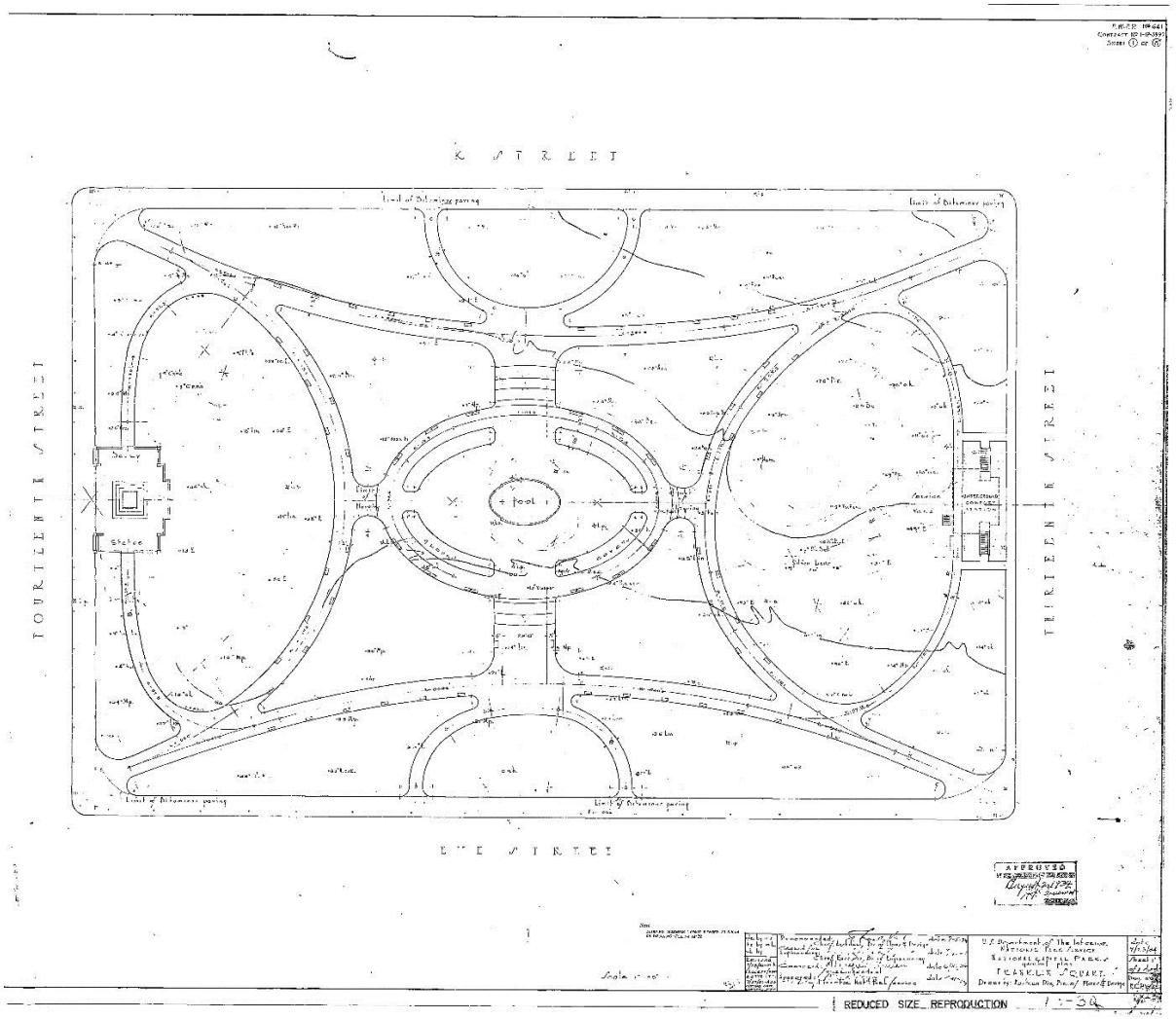
A major change to Franklin Park was the placement of the monumental Commodore John Barry memorial in the mid-point of the park's western side. The sculpture was designed by John J. Boyle, but its orientation facing out to 14th Street was the inspiration of landscape architect George Burnap. It displaced the west lodge/comfort station, which was replaced to the east by a structure designed by Burnap. The monument was dedicated in 1914 by President Woodrow Wilson (Figure 3.3).

Figure 3.3 – Commodore Barry Monument

After one intermediate change, the jurisdiction and maintenance responsibilities for Washington, D.C., parks was transferred back to the Interior Department, to the agency now known as the NPS.

By the 1930s, it was widely recognized that Franklin Park had greatly deteriorated. Its condition was that of rundown walkways, overgrown vegetation, and rotten trees. However, this was the era of the Depression. New Deal agencies such as the Public Works Administration (PWA) of the Interior Department were eager to invest in public improvements. After consultation with the various design review agencies in the national capital, a PWA grant of $75,000 was issued for tree and shrub replacement, soil improvement, grading, constructing a new circulation system, installation of a flagstone court around the fountain, and drainage improvements. The improvements, constructed in 1936, established a radically altered *parti*. Numerous trees, such as willow oaks and hornbeams, were planted around the flagstone plaza. Circulation was altered. A new, essentially symmetrical circulation system was created.. A new sandstone coped fountain, 1,750 square feet in plan with two fountain heads each shooting six jets of water 8 feet high replaced the earlier fountain. Figure 3.4 is a 1934 general plan of Franklin Park for its PWA redesign.

Figure 3.4 – 1934 General Plan of Franklin Park



Various modest changes, works of maintenance and even restoration, such as the replacement of modernistic "mushroom" lamps with PWA-era Saratoga lamps, took place in Franklin Park from the mid- through the latter twentieth century. The "Y shaped" walks were installed in 1945 and then both of them were removed in 2004-2005. In recent years, several trees have been removed to create sunny spaces. The change in Franklin Park's surroundings accelerated in this period. The neighborhood transitioned into a densely built-up part of the central business district. Rallies, demonstrations, and other public events took place periodically in the park. However, by the late 1960s, after the riots that followed the assassination of civil rights leader Dr. Martin Luther King, Jr., the area declined further. Prostitution, crime, and the presence of vagabonds discouraged middle class patronage.

Beginning roughly at the turn of the current century, downtown Washington, including the area around Franklin Park, enjoyed an astonishing commercial revival. Slick glass and thinly applied stone veneer post-modern office buildings — reaching and sometimes breaching (due to inclusion of towers) the height limit — were built on every side of the park. The historic and restored Franklin School on 13th Street and the relocated façade of the Almas Temple along K Street were the only exceptions. In tandem with the growth of commercial real estate, major new increments of residential space have been constructed in apartment blocks along sections of Massachusetts Avenue and eastern downtown. Assuming the permanence of the height limit, downtown Washington will shortly be "built out."

CULTURAL LANDSCAPES

Cultural landscapes, as defined by The Secretary of the Interior's standards, consist of "a geographic area (including both cultural and natural resources and the wildlife or domestic animals therein) associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values" (Birnbaum 1996). In 2005, the NPS completed a CLI for Franklin Park, jurisdictionally a component of the National Mall and Memorial Parks. The 2005 CLI was updated in 2011 (NPS 2011). The proposed alternatives have potential to directly affect one cultural landscape: Franklin Park as defined in the NPS's updated CLI.

The Franklin Park CLI embraces the 4.79-acre city block bounded by K Street NW, on the north; I or "Eye" Street NW, on the south; 14th Street NW, on the west; and 13th Street NW, on the east. It is a rectangle with the longer dimension extending east-west. The CLI, in the National Register Information section, recognizes the previous documentation work accomplished in the 1997 NRHP nomination of the L'Enfant Plan (NPS 2011). However, the CLI notes that the park was "entered inadequately documented" and that "Franklin Park is listed as a contributing feature to the 'L'Enfant Plan of the City of Washington' National Register nomination. However, only a short descriptive paragraph is included." The CLI contains a detailed chronology (including all land transfers) and physical history of Franklin Park.

Table 3.1 summarizes the CLI significance data according to current NRHP technical standards.

Table 3.1 – National Register Data

Cultural Landscape Type:	**Designed**
Other Use/Function	**Other Type of Use or Function**
Outdoor Sculpture (Statuary)	Both Current and Historic
Leisure – Passive (Park)	Both Current and Historic
Urban Park	Both Current and Historic
Fountain	Both Current and Historic
Name	**Type of Name**
Reservation 9	Both Current and Historic
Fountain Square	Historic
Franklin Square	Both Current and Historic
Franklin Park	Both Current and Historic
Significance	
NRHP Classification	Multiple Property
Level	National
Criteria	C –Embodies distinctive construction, work of master, or high artistic value
Time Period	AD 1867-1936
Historic Context Theme	Expressing Cultural Values
Subtheme	Landscape Architecture
Facet	The Era of Public Works
Time Period	AD 1867-1936
Historic Context Theme	Landscape Architecture
Facet	The Late Victorian Eclectic Landscape

Source: NPS (2011)

Despite the indication above that the time periods for both historic context themes is 1832–1946, Franklin Park actually has two periods of significance: 1791 to 1943 (that of the L'Enfant Plan), and 1867 to 1936, "a period which includes at least two distinct designs: elements of the first, Victorian, design were retained and influenced the new work of 1936" (NPS 2011).

The "Analysis and Evaluation of Integrity" section of the CLI presents a general summary of the features and values of Franklin Park as a cultural landscape. It evaluates Franklin Park as retaining medium integrity for its individual period of significance (1867–1936) according to five of the seven aspects of integrity used by the National Register: location, design, setting, materials and workmanship. Only feeling and association are deemed lacking. The CLI provides the following commentary on each of these aspects:

Location – The location has not changed.

Design – The design remains the same as in 1936, except for the replacement of some small-scale features, addition to the plant materials, and removal of the second lodge of 1914 from the east side and removal of the "Y shaped" paths on the east and west sides.

Setting – The setting has changed radically. Most of the surrounding buildings were constructed within the last 20 years and are much higher than the structures that stood there when the park was first improved in the 1870s and during its rehabilitation in the 1930s. Today, these large structures house offices and businesses, with the exception of the Franklin School and the relocated façade of the Almas temple.

Materials – The materials to construct walks and other features have changed. The walks are composed of synthetic bitumen dating from 1976 and laid over the 1930's paving, which included a concrete base covered with a bituminous material. The most recent concrete is patched, spalling and cracked in places, revealing the older material beneath. Most or all of the original quarter-round curbing is made of an aggregate concrete than the original (judging by what appear to be older sections of curbing in other parks and reservations). The surrounding walks were replaced with exposed aggregate concrete at the same time that walks of that material were installed around the park by the District of Columbia.

Low level plantings have all been removed.

Workmanship – Overall, workmanship is fair. The category of workmanship is relevant to the central plaza and its fountain and retaining wall and to the curbing. The plaza was recently rehabilitated, and the replacement flagstone paving work was done well. The retaining wall remains in good condition. The fountain's sandstone coping is cracked and spalling and in need of repair. The curbing that was installed in 1990 to replace the 1904/1905 curbing did not replicate the quarter-round profile of the original. Instead, many sections are irregularly square rather than curved. The curbing profile changes from one section to the next, and it is difficult to tell whether the profile is supposed to be square or quarter-round. The boundary curbing is a key visual element, so this problem with the work is particularly noticeable.

CHARACTERISTICS AND FEATURES

Certain broad landscape characteristics are typically identified and evaluated in CLIs. They include Natural Systems and Features, Spatial Organization, Topography, Land Use, Circulation, Vegetation, Buildings and Structures, Views and Vistas, Small Scale Features, Constructed Water Features, and Archeology. Not all are present in every cultural landscape. At a greater level of detail, the CLI includes lists of character defining features for many of the landscapes. A character defining feature will be given an identifying number and rated as either "Contributing" or "Non-contributing".

The 2011 Franklin Park CLI contains detailed information and is incorporated by reference in this EA. However, the following is a brief summary of the CLI's evaluation for each of the landscape characteristics considered significant:

Natural Systems and Features – Congress originally acquired the territory that became Franklin Park because of the presence of natural springs. These springs supplied supply water to the White House. However, the springs atrophied and were sealed off in 1897. Their location, thought to be north of the park's center, is uncertain. Clearly, they are no longer an extant natural feature. Deciduous trees provide shade in summer, but the surrounding tall buildings limit light penetration in the winter.

Spatial Organization – The spatial organization of Franklin Park remains similar to its arrangement during the period of significance with ranks of evenly spaced trees at the west and north edges and less evenly spaced trees at the east and south. There are three ellipses defined by walkways at the east, center, and west. The monumental fountain is the focus of the central ellipse while the flanking ellipses provide open lawns. Trees line the walkways.

Topography – Originally rolling, the topography of Franklin Park was re-graded several times and is probably less undulating than before. There is a gradual decline in elevation from north to south, but the central area around the fountain plaza, the area of the Commodore Barry Monument, is the only completely level area. Grass panels are raised several inches above grade.

Land Use – Land uses at and near Franklin Park have undergone several major changes from the park's inception from an amenity of a well-off genteel neighborhood in the nineteenth and early twentieth century (with an interval of military encampment during the Civil War), to urban decay, as prosperous families moved further out, to mixed commercial uses, and, currently, to an urban park in a dense district of first class office buildings and hotels. New nearby residential buildings have reintroduced a residential population.

Circulation – The first (Victorian) circulation pattern was one of asymmetrical looping walkways made of gravel originating at the corners of the park. These seemingly random walkways suffered from problems of deterioration and drainage; they were resurfaced with different materials and reshaped several times. The 1930s PWA project completely redesigned the circulation pattern to create the symmetrical three ellipse system described above. Direct paths for pedestrians to the fountain cutting through the park were a new priority.

Vegetation – The most important characteristics of vegetation on Franklin Park, open lawns surrounded by groves and lines of trees on the perimeter, remain. Replanting has occurred many times, driven by the reordering of the circulation pattern as much as a need to promote thriving vegetation. The CLI provides detailed accounts of planting and replanting by period, from "the first planting design" of 1866–1880, through the "redesign" of 1936, to "current conditions."

Buildings and Structures – The major historic structure is the 1914 statue of Revolutionary War hero Commodore John Barry by sculptor John Boyle, a bronze full-length figure standing atop a marble pedestal with a female figure of Victory and other sculptural embellishment attached. All face west toward 14th Street. The plaza surrounding the statue is itself artistically significant. A lodge located on the east side of the park was removed in 1974.

Views and Vistas – Views and vistas with regard to L'Enfant Plan streets and the wider urban design context are not significant. Internal views toward the fountain and outward toward the Franklin School have some importance as does the view of the Commodore Barry Monument from 14th Street.

Small-scale Features – The extant small-scale features that date from the period of significance and are considered contributing include standard 1930s park benches, the retaining wall, the cast

iron fence behind the Barry statue, and two squirrel basins. The "replacement" Saratoga style lights are considered non-contributing, but compatible.

Constructed Water Features – The 1936 replacement fountain with its buff colored stone and spouting jets, set in an oval plaza, is the park's major constructed water feature.

Historic Structures and Districts

THE L'ENFANT PLAN OF THE CITY OF WASHINGTON-A STRUCTURE

The L'Enfant Plan was listed on the NRHP in 1997 for its "relationship with the creation of the new United States of America and the creation of a capital city." Pierre L'Enfant was responsible for its original design, and subsequent alterations were made by notable persons. The period of significance is 1791 to 1942 and encompasses both the 1791 City of Washington design of Pierre L'Enfant and the 1901 and 1902 McMillan Plan developed by a four-member commission, comprising architects Charles McKim and Daniel Burnham, landscape architect Frederick Law Olmsted, Jr., and sculptor Augustus Saint-Gaudens. The 3,565-acre area nominated reflects the street grid, diagonal avenues, parks and their statuary, vistas among monuments, and sites over federal land within the plan's boundaries. It includes the territory of modern day Franklin Park as Reservation 9, which was not originally designated a federal reserve (NPS 2011).

FRANKLIN SCHOOL-A BUILDING

The Franklin School at 925 13th Street NW, on the east side of 13th Street below K Street NW, completed in 1868 and designed by Washington's preeminent German-American architect, Adolph Cluss, is a focal point for Franklin Park. The school was a model of advanced design in its day with its innovative Rundbogenstihl ("round-arched style") design. The school trustees declared that the construction of such buildings as Franklin School "will do much to redeem us from the imputation so often made that the city of Washington is a mere dependent upon Government and that it does nothing itself for the advancement of its citizens." The Franklin School won prizes as the most modern schoolhouse design at both the Vienna and the Philadelphia Centennial Expositions of 1876. It was the scene of Alexander Graham Bell's first wireless message. On June 3, 1880, Bell sent a message over a beam of light to a window in a building at 1325 L Street NW. The school was listed on the NRHP in 1973 and as an NHL in 1996 (NCPC 1973).

ALMAS TEMPLE-A BUILDING (PARTIAL)

One of the city's few examples of Exotic Revivalism, the Almas Temple was the home of Washington's Scottish Rite chapter, chartered in 1886. It has an exceptional polychrome glazed terra cotta façade of Moorish inspiration. It was built between 1929 and 1930 and designed by the architect Allen Hussell Potts. The façade was dismantled and reconstructed at 1315 K Street NW, west of the original site, in 1989–90 (DCOP 2009).

OLD MASONIC TEMPLE (MUSEUM OF WOMEN IN THE ARTS) – A BUILDING

The Old Masonic Temple, now the National Museum of Women in the Arts, is a monumental four-story building built in 1867-1869 in the French Renaissance style. Washington, D.C. architects Adolph Cluss and Joseph von Kammerhueber designed the building and had previously achieved national and international attention with their designs for the Wallach (1862) and Franklin (1866) schools, both located in the District of Columbia. Masons occupied the building from 1869 until 1908. In 1921 it became a large retail store leased by the Julius Lansburgh Furniture Company. The National Museum of Women in the Arts purchased the building in 1983. The building was listed in the NRHP in 1974 for its significance in architecture and local history (Beauchamp 1973).

THE CHAMPLAIN (ORME BUILDING) – A BUILDING

Built in 1905 and designed by architect Harold Clinton Smith, the Champlain apartment building is a distinguished seven-story Beaux Arts-style structure. The design of the building's principal elevation facing K Street, the use of marble, and the high quality of stone craftsmanship establishes the building as one of Washington's most distinguished early twentieth-century apartment buildings. The Champlain, now known as the Orme Building, was listed in the NRHP in 1994 under criteria A and C (Barsoum 1994).

HISTORIC DISTRICTS

There are no historic districts adjacent to or encompassing Franklin Park.

Public Safety and Accessibility

The NPS is committed to providing high-quality opportunities for visitors and employees to enjoy the park in a safe and healthy environment. Furthermore, the NPS strives to protect human life and provide for injury-free visits. Safety applies to both park visitors and park employees.

VISITOR SAFETY & CRIME

The park is equipped with several curved pathways that are lined with light post fixtures to provide increased visibility for visitors at night. These pathways were originally constructed of concrete base topped with a bituminous surface with double bands of darker concrete at the expansion joints. In 1976, the walkways were overlaid with a synthetic bitumen containing a mineral aggregate called "Pavebrite." Deterioration of the "Pavebrite" overlay is extensive, and the resulting uneven surface presents a tripping hazard and safety concern (DowntownDC BID 2009). See Figure 3.6. Metal edging surrounds all lawn and planting areas within the park. In numerous locations, the edging protrudes above grade and presents a tripping hazard. Snow and ice removal is performed during the winter months to reduce tripping hazards caused by the winter elements. The existing light output of the lamps used in the park does not provide a sense of security or safety in the park at night (NPS 2014b).

Figure 3.6 – Deteriorated Pathway Paving Surface

The park is under jurisdiction of the U.S. Park Police, and the surrounding area is under jurisdiction of the MPDC. The MPDC had reported 9 violent offenses and 38 property-related offenses within a 100 foot radius of the park within the past two years (MPDC 2012). A breakdown of criminal offenses is detailed in Table 3.2.

Table 3.2 – MPDC Crime Data for a 100-foot Radius of Franklin Park

Offense	2011	2012	Difference	%Difference
Homicide	0	0	0	N/C
Robbery	3	1	-2	-67%
Assault with a deadly weapon	3	2	-1	-33%
VIOLENT TOTAL	6	3	-3	-50%
Burglary	0	0	0	N/C
Theft	8	6	-2	-25%
Theft from auto	7	11	4	57%
Stolen auto	3	3	0	N/C
Arson	0	0	0	N/C
PROPERTY TOTAL	18	20	2	11%
TOTAL	24	23	-1	-4%

Source: MPDC (2012)

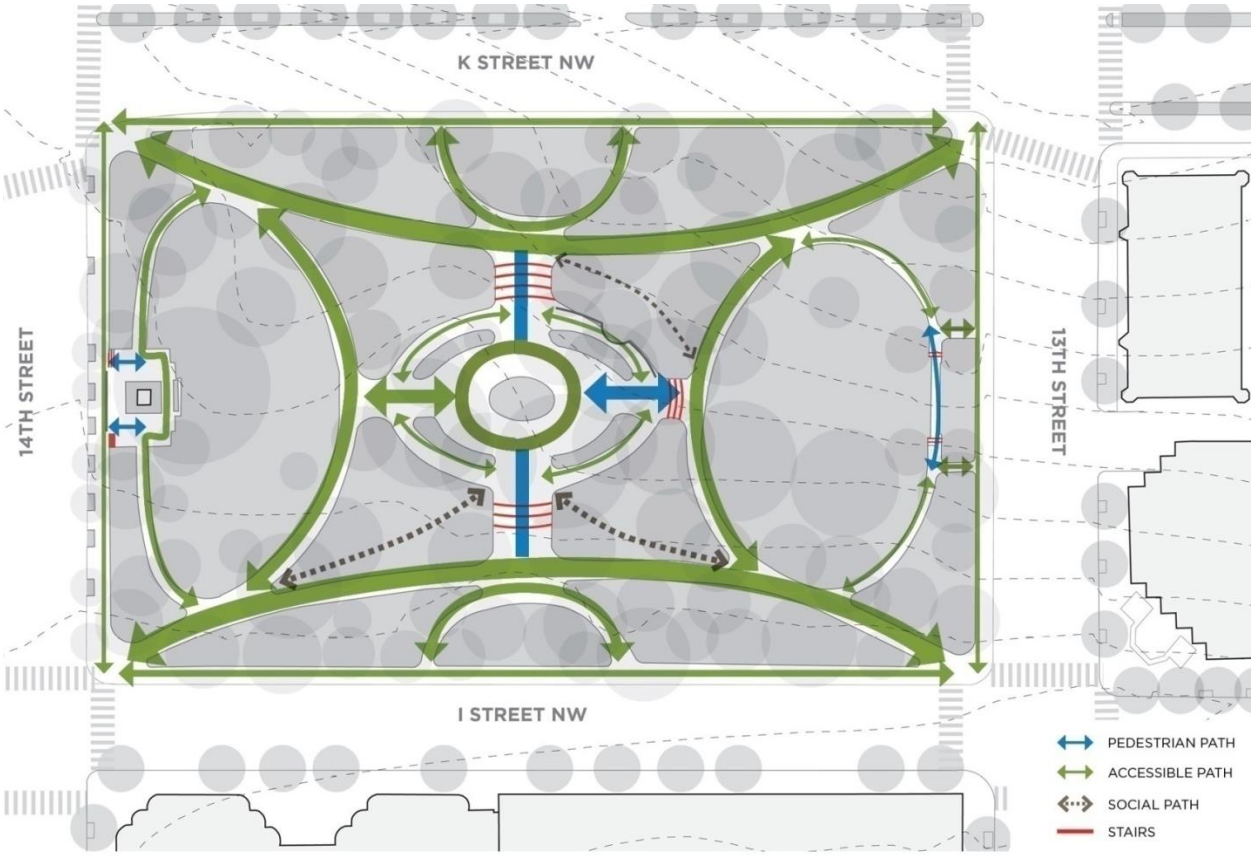
ACCESSIBILITY

The NPS is committed to enabling universal accessibility in all NPS facilities to ensure compliance with various legislation including the Architectural Barriers Act of 1968, the Architectural Barriers Act Accessibility Standard, the Rehabilitation Act of 1973, the Equal Employment Opportunity Act of 1972, and the Americans with Disabilities Act of 1990. NPS policy actively promotes equal access to all park resources for people with disabilities.

Figure 3.7 – Stair Entrance to Central Plaza on the South Side of the Park

Accordingly, the park is fully accessible from all four sides at each of the corners and at the two additional pathway entrances on the north, east, and south sides. The two entrance points on the west at the plaza for the Commodore John Barry statue have four steps. Accessibility throughout the park is limited to the perimeter pathways. The only at grade entrance to the central fountain and plaza is located on the west side. Broad shallow stairs mark the entrance to the central plaza on the north and east sides and transition the grade further on the south side (DowntownDC BID 2009). See Figures 3.7 and 3.8. In addition, the metal edging in some areas prevents universal accessibility between the pathways and the lawn panels.

Figure 3.8 – Site Circulation and Accessibility



Numerous social trails have developed over time from continued use by visitors seeking the most direct route through the park or by visitors waiting for food trucks. See Figure 3-9. These social trails are inaccessible to certain park user groups, including the elderly and people with disabilities. Additionally some areas of the lawn have challenging or uneven slopes that impede the use of this space by select user groups such as small children, people with disabilities, and the elderly (NPS 2014b).

Figure 3.9 – Social Trails Between Paved Pathways; Social Trails Adjacent to Food Truck Locations

Park Management and Operations

NATIONAL PARK SERVICE

The National Mall and Memorial Parks is an administrative unit of the National Park System, which includes Franklin Park. Park management structure for the National Mall and Memorial Parks is divided into the Office of the Superintendent and several divisions including Administration, Maintenance, Interpretation and Education, Park Programs, Resource Management, Partnerships, and Professional Services. The National Mall and Memorial Parks' Maintenance staff performs a majority of the day-to-day labor to maintain the park, while Resource Management staff performs all pest control services. Maintenance duties include, but are not limited to (White 2013):

- Sanitation – twice daily, five days a week
- Trash pickup with packer – twice daily, seven days a week
- Edging – four times a year
- Mulching trees – once every two years
- Snow and ice control - as needed (roughly 30–60 hours yearly)
- Tree pruning – once every three years
- Shrub pruning – once each year
- Stump removal – as needed
- Tree storm damage – as needed
- Tree removals – as needed
- Watering trees and turf - depends on drought conditions (roughly 70–100 hours yearly)

Groundone Landscape, a private landscaping company, provides mowing, edging, weed control, and leaf removal services for the entire park unit, including Franklin Park (White 2013).

The National Mall and Memorial Parks has a staff of approximately 330, who have responsibility for the National Mall's historic landscape and commemorative works, as well as the additional 156 U.S. reservations (circular, triangular, and rectangular parks throughout the District of Columbia) within the National Mall and Memorials Parks (NPS 2010b).

DOWNTOWNDC BUSINESS IMPROVEMENT DISTRICT

The DowntownDC BID provides services to enhance maintenance and visitor experience in Franklin Park pursuant to a Memorandum of Understanding with the NPS and through special event permitting. The DowntownDC BID rarely dedicates specific staff to work in Franklin Park; rather, Franklin Park is incorporated into the DowntownDC BID's larger, 1-square-mile service area as defined by its legal boundaries (Jones 2013).

A zone cleaner from the Safety/Hospitality and Maintenance (SAM) staff spends two hours daily Sunday through Friday picking up trash and litter in Franklin Park. A second SAM staff member is present in Franklin Park to provide wayfinding and other information to the public two hours a day, Monday through Friday. Beyond these services, the DowntownDC BID assigns SAM staff to the park as needed (as determined by SAM supervisors) to provide additional maintenance and hospitality services (e.g., when a rainstorm washes out topsoil or a particularly disruptive feeding program creates disorder). On one occasion, the DowntownDC BID paid for parts and labor to repair the broken water feature in the park. Periodically, the DowntownDC BID provides free public programming in Franklin Park, such as the 2013 Workout Wednesday program taking place one hour a week from July through September (Jones 2013).

The DowntownDC BID spends approximately $10,000 on maintenance, $9,000 on visitor services, and $8,000 on programming in Franklin Park, annually. This estimate includes direct and indirect costs (Jones 2013).

CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

This "Environmental Consequences" chapter analyzes both beneficial and adverse impacts that would result from implementing any of the alternatives considered in this EA. This chapter also includes definitions of impact thresholds (e.g., negligible, minor, moderate, and major), methods used to analyze impacts, and the analysis methods used for determining cumulative impacts. As required by CEQ regulations implementing the NEPA, a summary of the environmental consequences for each alternative is provided in Table 2.2 in "Chapter 2: Alternatives." The resource topics presented in this chapter and the organization of the topics correspond to the resource discussions contained in "Chapter 3: Affected Environment." Throughout this document the terms *impact* and *effect* are used interchangeably.

General Methodology for Establishing Impact Thresholds and Measuring Effects by Resource

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

- general analysis methods as described in guiding regulations, including the context and duration of environmental effects
- basic assumptions used to formulate the specific methods used in this analysis
- thresholds used to define the level of impact resulting from each alternative
- methods used to evaluate the cumulative impacts of each alternative in combination with unrelated factors or actions affecting park resources

These elements are described in the following sections.

General Analysis Methods

The analysis of impacts follows CEQ guidelines and DO-12 procedures (NPS 2001b) and incorporates the best available information applicable to the setting and the actions being considered in the alternatives. For each resource topic addressed in this chapter, the applicable analysis methods are discussed, including assumptions and impact intensity thresholds.

Impact Thresholds

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

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

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

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

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

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

Intensity: Because definitions of impact intensity (negligible, minor, moderate, or major) vary by impact topic, intensity definitions are provided separately for each impact topic analyzed. Thresholds are provided only for adverse impacts. (An EA typically does not include major adverse impacts; otherwise an environmental impact statement would likely be required.)

Cumulative Impacts Analysis Method

NEPA regulations require an assessment of cumulative effects in the decision-making process for federal projects. Cumulative effects are defined as "the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or nonfederal) or person undertakes such other actions" (CEQ 2005). Cumulative effects are considered for all alternatives, including the No Action Alternative.

The methodology for determining cumulative effects is derived from using an "X+Y=Z" analysis where "X" represents the impacts of the alternative and "Y" is other past, present, and reasonably foreseeable future actions. When considered relative to each other, their combined contribution to the overall cumulative effect is "Z." It is important to note that due to the disparate scale and location of the proposed actions, effects on a resource from certain proposed actions could be moderate but when considered in the overall context for that resource, could constitute a relatively small incremental portion of the project area and contribute to a collective minor effect.

Table 4.1 summarizes the projects considered for cumulative impacts and describes the various resource areas that could be affected by those projects. In addition to those actions identified below, other current and future plans are described in "Chapter 1: Purpose and Need." Figure 4.1 delineates the location of the projects being considered for cumulative impacts. The analysis of cumulative effects was accomplished using four steps:

1. **Identify Resources Affected**—Fully identify resources affected by any of the alternatives. These include the resources addressed as impact topics in "Chapter 3: Affected Environment" and "Chapter 4: Environmental Consequences."
2. **Set Boundaries** —Identify an appropriate spatial boundary for each resource. The spatial boundary for each resource topic is listed under each topic.
3. **Identify Cumulative Action Scenario**—Determine which past, present, and reasonably foreseeable future actions to include for each resource. These are listed in Table 4.1 and described below.
4. **Cumulative Impacts Analysis**—Summarize impacts of the other actions (X) plus impacts of the proposed action (Y), to arrive at the total cumulative impact (Z). This analysis is included for each resource at the end of the analysis for each alternative.

Table 4.1 – Cumulative Impacts Projects or Actions

Cumulative Impacts Project	Description	Status
Marriot Marquis	This LEED Silver-certified, 1 million square foot hotel opened May 1, 2014 at Massachusetts Avenue NW and 9th Street NW just west of the Mount Vernon Convention Center. The hotel has 1,175 rooms, 100,000 square feet of event space, retail and restaurant space, and an underground walkway linking guests to the Convention Center. **Affected Impact Topics:** Traffic and Transportation, Visitor Use and Experience, Socioeconomics	PRESENT 2014
City Center DC	City Center DC is a 10 acre development in Downtown Washington, D.C. bound by New York Avenue, NW, 9th Street NW, H Street NW, and 11 Street NW. The 2.5 million square food neighborhood development includes a mix of condominiums, apartments, offices, public spaces, hotel, restaurants, and shops. **Affected Impact Topics:** Traffic and Transportation, Visitor Use and Experience, Socioeconomics	PRESENT 2011–2014
Franklin School	A development team will restore the historic Franklin School located on the northeast corner of Franklin Park at 925 13th Street NW. The team will restore the building's exterior and original interior details, while transforming the rehabilitated building into exhibit space for contemporary art, sculpture, installations and performances. The development will also include adult and student art education programs, a new restaurant and café, and an arts bookstore. The development will seek to integrate art and to coordinate educational programs and events in the redesigned Franklin Park. **Affected Impact Topics:** Cultural Resources, Traffic and Transportation, Visitor Use and Experience, Park Management and Operations, Socioeconomics	2014-FUTURE
Move DC	Move DC is the District of Columbia's Multimodal Long Range Transportation Plan focused on implementing strategies to improve DC's transportation. The plan proposes I Street as a high capacity transit dedicated space. **Affected Impact Topics:** Traffic and Transportation, Visitor Use and Experience	PRESENT 2013-2014
Union Station to Georgetown Street Car	The District Department of Transportation (DDOT) has completed the Union Station to Georgetown Premium Transit Alternative Analysis Study, which proposes to place a streetcar line on K Street, on the northern edge of the project area. **Affected Impact Topics:** Traffic and Transportation, Visitor Use and Experience.	PRESENT
North-South Corridor Street Car	The District Department of Transportation (DDOT) is in the process of conducting a planning study along a 9-mile corridor including 14th Street, NW to determine the feasibility of placing a streetcar route in this area. The streetcar could be located along 14th Street NW, adjacent to the project area. **Affected Impact Topics:** Traffic and Transportation, Visitor Use and Experience.	PRESENT 2011–2013

Figure 4 -1 – Cumulative Impacts Projects

Soils

METHODOLOGY AND ASSUMPTIONS

This section assesses the potential effects on the turf and soils in the project area. Potential impacts on soils were assessed based on soil characteristics such as suitability, specific limitations associated with the soil types present in the project area, and the extent of possible disturbance. Impact analysis and the conclusions for possible impacts to the resources are based on review of existing literature and soil and topography maps and information provided by the NPS and other agencies.

STUDY AREA

The proposed action would be located on the Franklin Park grounds between K Street NW, 13th Street NW, I Street NW, and 14th Street NW. The area bounded by these streets represents the area of analysis.

IMPACT THRESHOLDS

The following thresholds were used to determine the magnitude of impacts on soil resources:

Negligible: Impacts on soils would be slight and largely unnoticeable compared to healthy native soils typical of the soil type and profile. Any effects on productivity, compaction, infiltration, subsidence, or erosion potential would not be measurable.

Minor: Impacts on soils would be noticeable compared to healthy native soils typical for the soil type and profile. Any effects on productivity, compaction, infiltration, subsidence, or erosion potential would be measurable, but localized to a small area.

Moderate: Impacts on soils would be readily apparent compared to healthy native soils typical for the soil type and profile. Any effects on productivity, compaction, infiltration, subsidence, or erosion potential would be measurable and cover several acres.

Major: Impacts on soils would substantially alter healthy native soils typical for the soil type and profile. Any effects on productivity, compaction, infiltration, subsidence, or erosion potential would be measurable and affect a relatively large area (more than 5 acres).

Duration: Short-term impacts to soils would occur during the construction activities. Long-term impacts to soils would extend after completion of the project.

Impacts of Alternative 1: No Action Alternative

ANALYSIS

The No Action Alternative represents a continuation of existing conditions, operations, maintenance, programming, and visitor use of the Franklin Park area.

Under the No Action Alternative, visitor use of existing social foot trails would continue, subjecting soils to continued substantial wear from the high intensity and frequency of pedestrian use. Although these paths have previously been compacted, exposed to erosion, and are primarily void of turf or vegetation, impacts would persist based on continued use, leading to further compaction, which can increase soil runoff and soil erosion, resulting in long-term minor adverse impacts to soils.

Soil permeability and runoff would continue to be varied, and remain generally poor within the project area, as a result of compaction and the sizeable presence of impervious surfaces. Because these maintenance and tree removal activities would be temporary and result in nominal disturbance, soil impacts are anticipated to be short-term and negligible adverse.

Overall, the No Action Alternative would result in further degradation of soils and compaction in the project area, leading to long-term minor adverse impacts resulting from intense visitor use in the project area.

CUMULATIVE IMPACTS

Past, present, and reasonably foreseeable actions are not anticipated to have any direct or indirect impacts to soils in the vicinity or within the project area, and no cumulative impacts to soils are expected.

CONCLUSION

Implementation of the No Action Alternative would result in long-term minor adverse impacts to soil resources due to continued compaction and erosion of soils from visitor use and maintenance activities, causing further erosion and exposure. No cumulative impacts to soils are expected.

Impacts of Alternative 2: The Center

ANALYSIS

Alternative 2 would rehabilitate and enhance the project area and include exploring options for the construction and operation of a café building, the location and size of hardscape, and tree canopy treatments. In addition to impacts discussed below for each element of the alternative, Alternative 2 and the different options within it would likely discourage use of the existing social paths because the wider pathways would more closely align with desire lines, resulting in long-term beneficial impacts to soils.

CENTER PLAZA

The addition of seasonal plantings around the perimeter of the plaza would have construction-related impacts to soils as a result of planting equipment and foot traffic associated with workers in the direct footprint of construction activities. Impacts would be short-term in nature occurring only during planting and maintenance activities and are not anticipated to noticeably disturb or compact soils. Overall impacts from these activities would be short-term negligible adverse.

Impacts for soils located in the direct footprint of the plantings would result from disruption, modification, and removal of soils. However, because much of the soil in the proposed footprint was previously impacted, the relatively nominal intrusion to soils from planting activities and comparatively small area impacted, overall impacts would be long-term and minor adverse.

CENTRAL WATER FEATURE

Improvements to utility and structural deficiencies would involve temporary disturbances, either removal or amendments to soil resources, and some fine grading of topography. Utility trenching for electricity and plumbing would occur in previously disturbed areas and increase the potential for erosion, resulting in short-term minor adverse impacts during construction. Upon completion, soils in the area of utility improvements would be restored to pre-construction conditions resulting in no long-term impacts.

HARDSCAPE OPTIONS

Under Alternative 2, a hardscape area would be constructed. The area would demarcate zones within the park and provide space for formal and informal events. For both Option A and Option B, soils in the vicinity of construction activities would be compacted, the soil layer structure would be disturbed and modified, and soils would be exposed, increasing the overall potential for erosion. Construction activities would have a localized, short-term negligible adverse impact on soils. Soil productivity would be completely eliminated, and all existing turf removed for areas within the footprint of the proposed hardscape resulting in localized long-term minor adverse impacts. The construction of a hardscape would also increase the amount of impervious surface in the project area increasing the potential for erosion,

resulting in long-term minor adverse impacts. However, there would be long-term beneficial impacts to soils from the rehabilitation of the turf where the existing social trails occur.

Option A – This option would create the least alteration to the existing soil resources, proposing a small rectangular terrace approximately 45 feet long and 20 feet wide and in combination with other hardscape pathways, would result in a total of 130,000 square feet of soft surface and an addition of 6,000 square feet of hardscape in the park compared to the No Action Alternative. The loss of soil productivity as a result of this option would occur in the area of the proposed hardscape and increase impervious surfaces within the project area leading to long-term minor adverse impacts to soils.

Option B – This option includes the construction of a large semi-circular terrace aligning with the existing green ellipse lawn in the north-central portion of the park. After construction, approximately 124,000 square feet of soft surface and an addition of 12,000 square feet of hardscape in the park compared to the No Action Alternative. Similarly to Option A, the loss of soil productivity under this option would occur in the area of the proposed hardscape and result in an increase in impervious surfaces within the project area. While larger in size than Option A, impacts under Option B would still be relatively small compared to the size of the park and previous impacts to soils, leading to overall long-term minor adverse impacts to soils.

CAFÉ AND BASIC AMENITIES OPTIONS

Alternative 2 considers an option for either no addition of a café building or the construction and placement of a café building, including a maintenance space, information booth, and restrooms within the same building structure.

Option A – Under this option, no café building or related amenities would be constructed, resulting in no impacts to soils.

Option B – Under this option, a 1,800-square-foot café building would be constructed on the central northern edge of the park. Soils in the area of construction activities would be compacted, the soil layer structure would be disturbed and modified, and soils would be exposed, increasing the overall potential for erosion. Construction activities would have a localized short-term negligible adverse impact on soils.

Soil productivity would be completely eliminated, and all existing turf removed for areas within the footprint of the proposed café building resulting in localized long-term minor adverse impacts. Construction of the café building would increase the amount of impervious surface in the project area increasing the potential for erosion, resulting in long-term negligible adverse impacts.

Overall there would be a loss of 1,800 square feet in soils in the location of the café with additional modified soils in the limit of disturbance for construction equipment and if utility trenching would be required. Efforts would be made to use existing utility trenches for electricity and plumbing, but in cases where additional utility trenches would be added, they would temporarily disturb and modify soils in the project footprint; however, based on the relatively small amount of soils impacted, impacts would be both short-term and negligible adverse, during construction and long-term negligible adverse for soils permanently removed as a result of trenching.

PLAY AREAS

Under Alternative 2, the addition of a 9,000-square-foot children's play area, including the placement of fencing materials, landscaping materials, and changes to topography, would disturb and modify soils, resulting in short- and long-term minor adverse impacts. Although the area has been previously disturbed, the construction of a play area could increase the amount of foot traffic and result in substantial wear, due to the high intensity and frequency of pedestrian use, leading to compaction and exposure to erosion in the area, resulting in long-term minor adverse impacts.

TREE CANOPY OPTIONS

Under Alternative 2, several unhealthy trees recommended for removal under all action alternatives would be removed, and new trees would be planted in their place. Several additional trees would be removed due to conflicts with construction planned under this alternative. For both options, soils in the area of construction would be compacted by tree removal activities, the soil layer structure would be disturbed and modified, and soils would be exposed, increasing the overall potential for erosion. In the footprint of removed trees, soil productivity would be temporarily disturbed and modified during tree removal and replacement resulting in overall short-term negligible adverse impacts to soils. However, the use of BMPs as described in the mitigation section of Chapter 2 would lessen impacts to soils to short-term negligible adverse.

Option A – Under this option, three trees would be removed in addition to the 17 unhealthy trees recommended for removal under all action alternatives. Eighteen new trees would be planted, resulting in tree canopy cover of 73% of the park area. Short-term negligible adverse impacts are anticipated to soils as a result of removal and replacement activities in combination with the use of soil BMPs.

Option B – Under this option, six trees would be removed in addition to the 17 unhealthy trees recommended for removal under all action alternatives. Eighteen new trees would be planted, resulting in tree canopy cover of 71% of the park area. Impacts as a result of this option would be similar to those presented above, although to a slightly higher degree as a result of more trees being removed and planted, but overall results would remain as short-term and negligible adverse.

CUMULATIVE IMPACTS

Past, present, and reasonably foreseeable actions are not anticipated to have any direct or indirect impacts to soils in the vicinity or within the project area, and no cumulative impacts to soils are expected.

CONCLUSION

Alternative 2 and its options would have a range of impacts on soil resources. All options would require construction and excavation of soil, which would cause short-term negligible to minor adverse impacts.

The implementation of Alternative 2 and its elements would discourage the need for the social paths, resulting in a long-term beneficial impact on soils.

The construction and operation of the café building, hardscape areas, utility trenching, and plantings would cause overall loss of soil productivity in the footprint of the sites resulting in long-term minor adverse impacts. The establishment of a play area could lead to an increase in foot traffic at the site, potentially resulting in long-term minor adverse impacts from use.

No cumulative impacts to soils are expected.

Impacts of Alternative 3: The Edge

ANALYSIS

Alternative 3 would rehabilitate and enhance the project area while retaining much of the historical spatial symmetry, including the construction and operation of a café building, hardscape, play area, tree canopy treatments, and adjustment of the existing pathways to more closely align with the direct diagonal social trails. There are no options within Alternative 3. In addition to impacts of elements of the alternative, Alternative 3 would discourage use of the existing social paths due to the widened and new pathway layout that more closely aligns with the diagonal desire lines in the park, resulting in long-term beneficial impacts to soils.

CENTER PLAZA

Similar to Alternative 2, the addition of seasonal plantings around the perimeter of the plaza would result in construction activity impacts to soils as a result of planting equipment and foot traffic associated with construction. Impacts would be short-term, occurring only during planting and maintenance activities, and would not noticeably disturb or compact soils. Overall impacts from these activities would be short-term and negligible adverse.

Impacts are anticipated for soils within the direct footprint of the plantings from disruption, modification, and removal of soils. However, because much of the soil in the proposed footprint has previously been impacted, the relatively nominal intrusion to soils from planting activities, and comparatively small area impacted, overall impacts are anticipated to be long-term and minor adverse.

The ring of tree plantings on the central plaza would be removed; impacts to soils from tree removal are discussed under the *Tree Canopy* section.

Seating options would be added around the center plaza and sited on previously paved areas; no impacts to soils are anticipated.

CENTRAL WATER FEATURE

Alternative 3 would redesign the interactive fountain in keeping with the shape and form of the existing fountain. Improvements to utility and structural deficiencies would involve temporary disturbances and either removal or amendments to soil resources and some fine grading of topography. If utility trenching is needed for filtration, electricity, or plumbing, it would likely occur in previously disturbed areas, but it would increase the potential for erosion resulting in short-term minor adverse impacts during construction. Upon completion, the area would return to pre-construction form, and there would be no long-term impacts.

HARDSCAPE

Under Alternative 3, a hardscape area/pedestrian mall would be constructed. The area would provide space for formal and informal events as well as a historical timeline of the park's history. The proposed pedestrian mall would be rectangular and approximately 35 feet wide along the southern edge of the site. The mall would lead to a total of 113,000 square feet of soft surface in the park and an addition of 20,000 of hardscape compared to the No Action Alternative. Construction activities would compact, disturb, and modify the soil layer structure increasing the overall potential for erosion and leading to a localized short-term negligible adverse impact on soils.

Soil productivity would be completely eliminated, and all existing turf would be removed for areas within the footprint of the proposed hardscape, resulting in localized long-term minor adverse impacts. The construction of a hardscape would also increase the amount of impervious surface in the project area increasing the potential for erosion, resulting in long-term negligible adverse impacts.

Neither the seasonal planters nor the historical markers would impact soils because both would be incorporated into already developed areas.

CAFÉ AND BASIC AMENITIES

Under Alternative 3, construction activities from the addition of up to a 2,200-square-foot café would compact, disturb, and modify the soil layer structure, increasing the overall potential for erosion and leading to a localized short-term negligible adverse impact on soils.

Soil productivity would be completely eliminated, and all existing turf would be removed for areas within the footprint of the proposed café building, resulting in localized long-term minor adverse impacts. The construction of an area would also increase the amount of impervious surface in the project area and increase the potential for erosion, resulting in long-term negligible adverse impacts.

Efforts would be made to use existing utility trenches for electricity and plumbing, but where additional utility trenches would be added, they would temporarily disturb and modify soils within the project footprint. However, based on the relatively small amount of soils impacted, impacts would be both short-term and negligible during construction, and long-term negligible for soils permanently removed as a result of trenching.

PLAY AREAS

Under Alternative 3, the placement of fencing and landscaping materials and changes to topography related to the addition of up to a 12,000-square-foot children's play area would disturb and modify soils, resulting in short- and long-term negligible adverse impacts. Although the area has been previously disturbed, the construction of a play area could increase the amount of foot traffic and result in substantial wear, due to the high intensity and frequency of pedestrian use, leading to compaction and exposure to erosion in the area, resulting in long-term minor adverse impacts.

TREE CANOPY

Under Alternative 3, 27 trees would be removed in addition to the 17 unhealthy trees recommended for removal under all action alternatives. Forty-three new trees would be planted, resulting in tree canopy cover of 63% of the park area. As a result of construction activities related to tree removal and planting, soils in the area of construction would be compacted, the soil layer structure would be disturbed and modified, and soils would be exposed, increasing the overall potential for erosion. In the footprint of removed trees soil productivity would be temporarily disturbed and modified during tree removal and replacement resulting in overall short-term minor adverse impacts to soils. However, the use of BMPs as described in the mitigation section of Chapter 2 would lessen impacts to soils to short-term negligible adverse.

CUMULATIVE IMPACTS

Past, present, and reasonably foreseeable actions are not anticipated to have any direct or indirect impacts to soils in the vicinity or within the project area; therefore, there would be no cumulative impacts on soils under Alternative 3.

CONCLUSION

Alternative 3 would have a range of impacts on soil resources. All elements require construction and excavation of soil, which would have short-term negligible adverse impacts.

The implementation of this alternative would discourage the need for the social paths, resulting in a long-term beneficial impact on soils.

The construction and operation of the café building, hardscape areas, utility trenching, and plantings would eliminate soil productivity in the footprint of the sites, resulting in long-term minor adverse impacts. The establishment of a play area and tot lot could lead to an increase in foot traffic at the site, potentially resulting in long-term minor adverse impacts from use.

No cumulative impacts to soils are expected.

Vegetation

METHODOLOGY AND ASSUMPTIONS

Under NPS Director's Order 77: *Natural Resources Management* (NPS n.d.), the NPS is responsible for managing, conserving, and protecting the natural resources found in National Park System units. Available information on the vegetation in the project area, especially mature trees and landscape, was compiled and reviewed. Impacts on vegetation were based on general characteristics of the site and vicinity, available aerial photos, site observations, proposed encroachment into vegetated areas associated with construction, and removal of vegetation.

STUDY AREA

The study area for vegetation includes the area within the boundaries of Franklin Park, the adjacent sidewalks and curbs surrounding the park, and any areas that would be used for construction staging areas for equipment and supplies.

IMPACT THRESHOLDS

The following thresholds were used to determine the magnitude of impacts on vegetation:

Negligible: Very few individual trees or turf would be affected.

Minor: A few individual trees or a small amount of turf would be affected; however, mitigation measures such as replanting to avoid or offset impacts on trees could be implemented, which would be effective in replacing or reducing losses of vegetation in a short time.

Moderate: A relatively large number of individual trees or turf would be affected. Mitigation measures such as replanting to avoid or offset impacts on trees and other landscaping of greater concern could be implemented and would be effective in replacing or reducing losses of vegetation, but extended time may be needed for the regeneration of lost mature vegetation.

Major: A substantial volume of individual trees and turf would be affected, and numerous older mature trees would also be impacted, either directly or indirectly. Actions would substantially change the vegetation over a large area in the study area. Extensive mitigation would be needed to offset adverse impacts, and its success would not be assured.

Duration: Short-term impacts to vegetation would occur during implementation of any of the alternatives. Long-term impacts to vegetation would extend beyond implementation of any of the alternatives.

Impacts of Alternative 1: No Action Alternative

ANALYSIS

The No Action Alternative represents the current conditions at the proposed site. Existing operations, maintenance, programs, and visitor use of the Franklin Park area would continue.

Under the No Action Alternative, the current lawn areas would remain, including small areas of worn or eroded grass along social trails, other areas of intense visitor usage such as areas around bus stops and food truck locations, and around the park perimeter. Currently, there are no seasonal or understory plantings. The continued use of social trails would further compact the soils and inhibit growth of vegetative ground cover. Grass would continue to be sparse or absent beneath some tree canopies. Most of the existing tree community would remain, including historic, mature, and unhealthy trees. Therefore, impacts to vegetation would be long-term and negligible adverse under the No Action Alternative due to remaining unhealthy trees and vegetation affected by visitor usage and degraded soil.

CUMULATIVE IMPACTS

None of the past, present, or future projects included in the cumulative impacts analysis would impact vegetation; therefore, there would be no cumulative effects on vegetation under the No Action Alternative.

CONCLUSION

The implementation of the No Action Alternative would result in long-term negligible adverse impacts. There would be no cumulative impacts on vegetation under the No Action Alternative.

Impacts of Alternative 2: The Center

ANALYSIS

This alternative would preserve the general spatial structure and layout of the park while also rehabilitating and improving the center plaza and water feature. Additional features to rehabilitate and enhance the park would include a café, play area, impervious surfaces, and vegetation treatment.

CENTER PLAZA

Rehabilitation of the center plaza would not adversely impact vegetation. Existing trees within the planting areas would remain. The addition of seasonal plantings along the perimeter of the plaza would have long-term beneficial impacts to vegetation due to the enhancement of the vegetative community within the park.

CENTRAL WATER FEATURE

No trees or grass areas would be disturbed during restoration of the existing water feature because the site is covered by an impervious surface. Therefore, implementation of this element of Alternative 2 would have no impact on vegetation.

HARDSCAPE OPTIONS

Hardscaping would be added to the existing Franklin Park layout to establish zones within the park; enhance and widen existing pathways; and provide space for events, programs, services, and recreation. Both options would repair the social trails resulting in long-term beneficial impacts to vegetation because the formation of new social trails would be greatly reduced and the compacted soil and worn turf in those areas would be repaired. Both the square footage and location of the hardscaping would differ under the two proposed options. The options for hardscaping are described and analyzed below.

Option A –Construction related to the pathway improvements and 45-foot by 20-foot terrace would clear and remove approximately 6,000 square feet of grass, resulting in long-term negligible adverse impacts to vegetation because the turf in the terrace area is currently worn and partially absent, and the removal would represent a slight loss in overall turf cover.

Option B –Construction related to the addition of a semi-circle terrace and pathway improvements would clear and remove approximately 12,000 square feet of turf. Therefore, this option would have long-term minor adverse impacts to vegetation due to the removal of a small amount of turf compared to the park as a whole.

CAFÉ AND BASIC AMENITIES OPTIONS

Alternative 2 considers an option for the construction and placement of a café building, including a maintenance space, information booth, and restrooms within the same building structure.

Option A – No café or other amenities would be added, and no trees or grass areas would be disturbed. Therefore, implementation of this option would have no impact on vegetation.

Option B – This option includes the construction of a 1,800-square-foot café, maintenance space, information booth, and restrooms. Impacts to vegetation under this option would be similar to those described under the hardscape element, Option B. Because a relatively small area of turf would be removed, this option would result in long-term negligible adverse impacts to vegetation. Several trees would be removed as a result of this option, and the resulting impacts are described under Alternative 2, Option B below.

PLAY AREAS

A 9,000-square-foot play area would be constructed in the northern portion of the east lawn. Implementation of this element of Alternative 2 would require disturbance of vegetation within the play area footprint due to the clearing of turf and several trees resulting in short-term and long-term adverse impacts. The play area surface would consist mainly of pervious materials including turf and natural materials. Following construction, vegetation would be replanted in most areas around the play area. Therefore, this element of Alternative 2 would result in short-term minor adverse impacts to vegetation during construction because grass would be removed and long-term negligible adverse impacts after construction because much of the cleared turf would be replanted. The impacts from the removal of trees in the vicinity of the play area are described under the tree canopy options below.

TREE CANOPY OPTIONS

Under Alternative 2, several potential actions would affect the overall tree canopy within the project area. Two options exist for tree removal and planting combinations to accommodate differences in construction for the other Alternative 2 options. Both tree canopy options include the removal of the 17 unhealthy trees recommended for removal under all action alternatives. The tree canopy options are described and analyzed below.

Option A – In addition to the 17 trees in poor to very poor condition recommended for removal under all action alternatives, three additional trees would be removed under this option. The three additional trees are located in the area proposed for the play area. A total of 18 new, young trees would be planted within the project area; 14 trees would be planted in curbside tree boxes along 13th and 14th Streets, two trees would be planted in the proposed play area, one tree would be planted in the northwest planting area surrounding the central plaza, and one tree would be planted in the northeast lawn panel. After implementation of this option, the total tree canopy would cover 73% of the Franklin Park area. This constitutes an overall loss of 1% canopy cover. Although trees would be removed, most of them are unhealthy. The removal of unhealthy trees and the addition of new, healthy trees would offset the long-term adverse impacts. Tree canopy Option A would result in short-term minor adverse impacts due to tree removal during construction and long-term negligible adverse impacts due to the very slight loss of tree canopy cover after construction.

Option B – In addition to the 17 trees in poor to very poor condition recommended for removal under all action alternatives, six additional trees would be removed under this option. Three trees each would be removed from within both the proposed café/hardscape and the play area footprints. Under this option, tree plantings would be the same as described for tree canopy Option A resulting in a total of 18 new, young trees planted within the project area and the replacement of two trees lost in the proposed play area. After implementation of this option, the total tree canopy would cover 71% of the Franklin Park area. This constitutes an overall loss of 3% canopy cover. The removal of unhealthy trees and the addition of new, healthy trees would result in a more balanced tree canopy and offset some of the long-term adverse impacts. Therefore, tree canopy Option B would result in short-term adverse minor impacts due to tree removal during construction and long-term minor adverse impacts due to loss of mature trees and tree canopy cover after construction.

CUMULATIVE IMPACTS

None of the past, present, or future projects included in the cumulative impacts analysis would impact vegetation; therefore, there would be no cumulative effects on vegetation under Alternative 2.

CONCLUSION

The implementation of Alternative 2 would result in the loss of a small amount of turf and the overall loss of canopy cover of 1 to 3%. Although mature trees could potentially be removed, this alternative would involve planting of new trees. Additionally, seasonal plantings would be added to the center plaza. Therefore, impacts to vegetation would be long-term minor adverse. There would be no cumulative impacts on vegetation under Alternative 2.

Impacts of Alternative 3: The Edge

ANALYSIS

Alternative 3 would reconfigure some pathways to more closely conform to existing social trails while also preserving the general historic layout of the park pathways. The center plaza and water feature would be rehabilitated and improved, and enhancements such as a café, play area, additional impervious surfaces including a pedestrian mall, and vegetation treatment would be added.

CENTER PLAZA

The addition of seasonal plantings along the perimeter of the plaza would result in long-term beneficial impacts to vegetation. Rehabilitation of the center plaza would remove the four tree planters on the central plaza resulting in impacts to vegetation, which are discussed under the tree canopy element below.

CENTRAL WATER FEATURE

No trees or grass areas would be disturbed during restoration of the existing water feature because the site is covered by an impervious surface. Therefore, implementation of this element of Alternative 3 would have no impact on vegetation.

HARDSCAPE

Up to a 40-foot-wide rectangular pedestrian mall would be constructed along the southern portion of the park. Hardscaping of existing social trails would connect the pedestrian mall to the central plaza of the park and to I Street. Sidewalks and pathways would be widened to approximately 11 to 20 feet, depending on location. Alternative 3 would improve existing sidewalks and repair the existing social trails by placement of new turf. These actions would result in long-term beneficial impacts to vegetation because the improved paths would reduce the need for the formation of new social trails, and the compacted soil and worn turf in those areas would be repaired. Construction would clear and remove about 20,000 square feet of turf. This option would have long-term minor adverse impacts to vegetation due to the turf removal. Vegetative features to be added include approximately 35-foot-wide planters along the southern edge of the pedestrian mall, seasonal plantings around the park perimeter, and new turf on the existing social trails, resulting in long-term beneficial impacts to vegetation due to the enhancement of the vegetative community within the park.

CAFÉ AND BASIC AMENITIES

Construction of up to a 2,200-square-foot building housing a café, maintenance space, information booth, and restrooms would impact vegetation due to clearing and removal of a small amount of turf. Therefore, this element of Alternative 3 would result in long-term negligible adverse impacts to vegetation. Several trees would be removed from construction of the cafe; the resulting impacts are described under the tree canopy element below.

PLAY AREAS

Up to a 12,000-square-foot play area with adjacent tot lot would be constructed in the northern portion of the east lawn. Implementation of this element would require disturbance of vegetation within the play area footprint due to the clearing of turf and several trees, resulting in short-term and long-term adverse impacts. The play area surface would consist mainly of pervious materials, including turf and natural materials. Therefore, this element of Alternative 3 would result in short-term minor adverse impacts to vegetation due to the removal of turf during construction and long-term negligible adverse impacts after construction due to replanting of much of the cleared turf. Impacts from the removal of trees in the vicinity of the play area are described under the tree canopy element below.

TREE CANOPY

In addition to the 17 trees in poor to very poor condition recommended for removal under all action alternatives, 27 additional trees would be removed from the project area. Under this element of Alternative 3, a total of 43 new, young trees would be planted within the project area. Most of these trees would be placed along the street; however, several would be placed in the park interior to replace trees lost during construction activities, including within the proposed play area. After implementation of this alternative, the total tree canopy would cover 63% of the Franklin Park area. This constitutes an overall loss of 11% canopy cover. The removal of unhealthy trees and the addition of new, healthy trees resulting in a more balanced tree canopy would offset some of the long-term adverse impacts of tree loss. Therefore, the tree canopy element under Alternative 3 would result in short-term minor adverse impacts due to tree removal during construction and long-term minor adverse impacts due to loss of mature trees and tree canopy cover after construction.

CUMULATIVE IMPACTS

None of the past, present, or future projects included in the cumulative impacts analysis would impact vegetation; therefore, there would be no cumulative effects on vegetation under Alternative 3.

CONCLUSION

The implementation of Alternative 3 would result in the loss of turf and the overall loss of one tree from the tree community. However, there would be a loss of canopy cover of 11%. Although mature trees would be removed, Alternative 3 would involve planting of new trees for mitigation, which would improve the health of the overall tree community. Seasonal plantings would be added to the center plaza and park perimeter as well as planters to the southern edge of the pedestrian mall. Therefore, impacts to vegetation would be short-term and long-term minor adverse. There would be no cumulative impacts on vegetation under Alternative 3.

Visitor Use and Experience

METHODOLOGY AND ASSUMPTIONS

The purpose of this impact analysis is to assess the effects of the alternatives on the visitor use and experience in the areas that would be affected in and around the project area. To determine impacts, the current uses of the area were considered and the potential effects of the construction and implementation of the rehabilitation on visitor experience and use were analyzed. Activities and the type of visitor use and experience that occur in the park and that might be affected by the proposed action, as well as the visual character of the area and noises experienced by the visitors, were considered.

STUDY AREA

The project area includes Franklin Park, which is bounded by K street NW to the north, 13th street NW to the east, I street NW to the south, and 14th street NW to the west. For the impact analysis, the study area for visitor use and experience includes the larger area of Downtown Washington, D.C., as well as the attractions in the surrounding areas. Projects and plans in the immediate vicinity of Franklin Park, particularly those that result in new visitor use opportunities or temporary closures, are considered in the cumulative impacts analysis.

IMPACT THRESHOLDS

Negligible: The impact would not be detectable or would be barely detectable to most visitors and would not affect their experiences or opportunities in a perceptible manner.

Minor: The impact would be detectable to some visitors and might result in some effect on their experiences or opportunities.

Moderate: The impact would be readily apparent to many visitors and would likely affect the experiences or opportunities of many visitors.

Major: The impact would be obvious to most visitors and would affect the experiences or opportunities of most or all visitors.

Duration: Short-term impacts would occur throughout the course of one year. Long-term impacts would last more than one year.

Impacts of Alternative 1: No Action Alternative

ANALYSIS

Under the No Action Alternative, visitor access, intensity of use, and programming would continue at existing levels. Park programming would not change, and the peak visitation would continue to occur during the lunch hours for office workers. Visitation would continue to peak during the weekday lunch hour and significantly drop off on the weekend. Under this alternative, visitors at the park would continue to use the park primarily for standing, sitting on benches or other surfaces, lying down, dog walking, eating lunch, or performing other recreational activities, resulting in a long-term beneficial impact to visitor use.

Under the No Action Alternative, social trails would remain and continue to be subject to substantial wear due to high intensity of pedestrian use adversely impacting the park aesthetics and causing long-term minor adverse impacts to visitor experience. Current operation and maintenance issues with the central fountain and its associated plumbing system would continue. The filtration system along with the structural and visible integrity of the fountain would continue to deteriorate over time, eventually resulting in failure of the fountain to be operable. As a result of visibly degraded operation or lack-thereof of the fountain, minor long-term adverse impacts to visitor experience would occur. The park's tree

canopy would remain. The tree canopy would continue to provide an unbalanced pattern of sun and shading with a large amount of shade on the center plaza, impacting visibility in the area. As a result, there would be long-term negligible adverse impacts to visitor experience. Overall, the No Action Alternative would result in negligible to minor long-term adverse impacts to visitor experience with continued long-term beneficial impacts to visitor use at Franklin Park.

CUMULATIVE IMPACTS

Past, present, and future activities in the project area that could affect visitor use and experience include new construction and development, along with new transportation corridors throughout the city.

The construction of the Marriot Marquis, a LEED certified, 1-million-square-foot hotel was completed on May 1, 2014, when the hotel opened to the public. This newly constructed hotel would benefit the park by providing nearby lodging. This would enable users to have improved access to and from the park. City Center DC is another ongoing development project in proximity to the park that would provide visitor use opportunities. When complete, this 10-acre development will provide 2.5 million square feet of neighborhood mixed use development, which includes a mix of condominiums, apartments, offices, public spaces, hotels, restaurants, and retail opportunities for park visitors. Additionally, the Franklin School improvement project seeks to renovate and restore the historic school located on the northeast corner of Franklin Park into a contemporary art exhibit space. The development will include adult and student art education programs, a new restaurant and café, and an arts bookstore. The Franklin School project also seeks to make meaningful connections with the park by placing interactive art exhibits on the east side of the park. The interaction between green space and the mixed use development of the Marriot Marquis, City Center DC, and the Franklin School would enhance the visitor use and experience of Franklin Park by providing more visitor use opportunities in the project area. As a result, there would be long-term beneficial cumulative impacts from these development projects.

The DDOT has several projects underway to enhance public transportation, including a Union Station to Georgetown Plan for a streetcar, along K Street NW, and a North-South Streetcar Corridor along 14th Street NW. Additionally, there is a transportation development plan underway called Move DC, which aims to develop I Street NW into a high-capacity, transit-dedicated space. These projects would have a long-term beneficial impact to visitor use and experience because they would provide improved access to the park. However, there would be short-term minor adverse impacts to visitor use and experience during the construction.

The long-term beneficial impacts from other actions and plans on the visitor use and experience in the study area, combined with long-term negligible to minor adverse impacts associated with the No Action Alternative, would result in long-term beneficial cumulative impacts to visitor use and experience.

CONCLUSION

Under the No Action Alternative, the primary use of the park would continue to be for those passing through to access areas on the other side, and for visitors enjoying their lunch during regular office hours. The park would continue to experience low levels of visitation outside of standard working hours, especially on weekends when visitor use is considerably less.

Under the No Action Alternative, visitor experience would continue to be affected by the deterioration of the aesthetic to the park caused by the social trails and deteriorating fountain, and the imbalance of shading due to the current tree canopy cover. As a result, there would be a long-term negligible to minor adverse impact to visitor use and experience. Combined with other developments in the project area, there would be long-term beneficial cumulative impacts.

Impacts of Alternative 2: The Center

ANALYSIS

Under Alternative 2, the park would be rehabilitated and enhanced, while retaining much of its existing historic spatial symmetry and layout. This alternative would provide options for the construction of a café, additional hardscaping, and tree canopy treatments. It is expected there would be short-term minor adverse impacts to visitor use due to the partial closure of the park during construction.

CENTER PLAZA

Under Alternative 2, the center plaza would remain the same size and the same shape, including the ring of trees and plantings around the plaza. Seasonal plantings would be added to the perimeter of the plaza to enhance park aesthetics and encompass the plaza to create a more inviting environment. The seasonal plantings would highlight the central plaza as the focal point of the park and provide a buffer, creating a sense of place within the park. As a result, there would be long-term beneficial impacts to visitor use and experience due to the improved aesthetics from the additional seasonal plantings around the center plaza.

CENTRAL WATER FEATURE

Under Alternative 2, the fountain would be restored and rehabilitated to resolve filtration, plumbing, and structural deficiencies. The fountain's aesthetics would be repaired by improving the cracked coping and the overall functioning of the fountain. The improved aesthetics and functioning fountain would reactivate the central plaza, providing visitors a place to rest, relax, and enjoy the view and acoustics provided by the fountain, resulting in long-term beneficial impacts to visitor use and experience.

HARDSCAPE OPTIONS

Option A – Under Option A, the addition of a small, rectangular terrace on the eastern edge of the park would provide dedicated space for park visitors to eat after purchasing food from the food trucks on the east side of the park. The plaza would provide visitors additional seating and separation for visitors walking around the park from those enjoying a meal or sitting. This would likely increase visitation at the park as well as lengthen the stay of visitors by providing an inviting space to relax and enjoy their time. As a result, there would be a beneficial impact to visitor use and experience due to the increased hardscape creating a more inviting user-friendly space.

Option B – Under Option B, the addition of a large semi-circular terrace on the northern edge of the park would create an inviting, dedicated space for park users visiting the café or wishing to enjoy their food. This terrace would provide users with additional seating surrounded by the existing green ellipse lawn. As a result, visitation would likely increase, and there would be a beneficial impact to visitor use and experience due to the implementation of more hardscapes at the park.

CAFÉ AND BASIC AMENITIES OPTIONS

Option A – Under Option A, the park would continue to have no café services.

Option B – Under Option B, the addition of a café and other basic amenities on the northern edge of the park would create a destination within the park boundaries and provide users with an increased range of activities and amenities to enjoy while experiencing the park. The introduction of new visitor uses by way of increased amenities would enable users to visit the park consistently throughout the day and would likely increase visitation. As a result of the increased amenities to the park, there would be a long-term beneficial impact to visitor use and experience.

PLAY AREAS

Under Alternative 2, the addition of a children's play area to the northern part of the east lawn would be beneficial to residents in the area seeking an area for their children to enjoy a safe place to play and experience nature within the city limits. As a result of the play area, there would increase visitation at the

park and diversification of the type of visitor using the park. The addition of a children's play area would result in long-term beneficial impacts to visitor use and experience.

TREE CANOPY OPTIONS

Under Alternative 2, the 17 trees recommended trees for removal under all action alternatives would be removed, and new, younger trees would be planted in their place. In addition, there would be other trees removed due to conflicts with the construction planned under this alternative.

Option A – Under this option, there would be three healthy trees removed in addition to the 17 unhealthy trees recommended for removal under all action alternatives. There would be 18 new trees planted, resulting a total tree canopy of 73% of the project area. The removal of trees would result in a short-term minor adverse impact to visitor use during the temporary closures during removal. The addition of trees would provide strategic shading coinciding with the various visitor uses at the park. A more balanced tree canopy would provide comfort for visitors wishing to enjoy the sunlight and for those seeking shade. As a result, there would be long-term beneficial impacts to visitor use and experience.

Option B – Under this option, six trees would be removed in addition to the 17 unhealthy trees recommended for removal under all action alternatives. Eighteen new trees would be planted in the park, resulting a total tree canopy of 71% of the project area. The removal and addition of trees would improve the aesthetics of the park by providing shade in strategically placed areas and bordering the eastern and western edges of the park. Similar to Option A, there would be long-term beneficial impacts to visitor use and experience.

CUMULATIVE IMPACTS

Impacts from other actions and projects in the cumulative area of analysis would be the same as those described under the No Action Alternative, resulting in long-term beneficial impacts from increased mixed use developments and transportation projects in the vicinity of Franklin Park. The effects of these actions, in combination with the long-term beneficial impacts from Alternative 2, would result in long-term overall beneficial cumulative impacts on visitor use and experience.

CONCLUSION

Under Alternative 2, there would be short-term minor adverse impacts during construction due to the park's partial closure to visitors. However, in the long-term, there would be beneficial impacts to visitor use and experience due to the rehabilitation of the central water feature, the addition of hardscaping, the creation of a more balanced tree canopy, and potential addition of a café on the north side of the park. Combined with other development projects in the study area, Alternative 2 would have long-term beneficial cumulative impacts to visitor use and experience.

Impacts of Alternative 3: The Edge

ANALYSIS

Under Alternative 3, the park would be rehabilitated and enhanced by adding hardscaping for events and park programming, adjusting the existing pathways to more closely align with the direct diagonal social trails, and retaining the general curved layout of the existing pathways. There would be short-term minor adverse impacts to visitor use due to the partial closure of the park during construction.

CENTER PLAZA

Under Alternative 3, the ring of tree plantings around the central plaza would be removed, increasing the total accessible space on the plaza. Seating options would be added on the central plaza, providing visitors a place to sit and enjoy the park. Seasonal plantings would be added surrounding the park's outer perimeter, enhancing the aesthetics of the plaza and the experience of visitors. The improved seating and aesthetics of the central plaza would result in long-term beneficial impacts to visitor use and experience.

CENTRAL WATER FEATURE

Under Alternative 3, the central water fountain would be redesigned to include an interactive element, to improve the fountain's aesthetics, and provide seating around the edge of the fountain with a raised coping. The redesigned fountain would enable visitors to interact with the water, sit on the edge of the fountain, and enjoy the plaza. The new fountain would draw in visitors to the central plaza creating an active space, and the water element would provide ambient background noise for park users. As a result of the redesigned fountain, visitation to the park would likely increase, and there would be long-term beneficial impacts to visitor use and experience.

HARDSCAPE

Alternative 3 would add a rectangular, up to a 40-foot-wide pedestrian mall along the southern edge of the site, providing opportunities for events such as farmers' markets and festivals. The pedestrian mall would have an engraving on the pavement about the park's history, providing visitors a new interpretive opportunity. Planters with seasonal plantings would be added along the southern edge of the park. The planters would create a visual distinction between the park and the urban setting outside creating a sense of place and transition as visitors enter the park. The planters would also provide a separation between park users and commuters waiting for their buses. Seating for the bus stop would be inset into the planters, providing commuters a relaxing, dedicated space to queue for the bus. The planters would enhance the aesthetic value of the park, resulting long-term beneficial impacts to visitor experience. As a result of the additional amenities, seasonal plantings, reconstructed hardscape, and improved aesthetics, there would be long-term beneficial impacts to visitor use and experience.

CAFÉ AND BASIC AMENITIES

Under Alternative 3, the addition of a café and other amenities such as food services, additional seating, restrooms, and an information booth would provide a variety of new experiences at the park for visitors. The new amenities would result in increased visitation and diversity of users to the park. Providing a café would enable visitors to use the park consistently throughout the day and into the evening, converting the park to 18-hour programming. The addition of food services and amenities along I St, however, could increase the number of visitors and likely concentrate visitors along the edge of the park in the area of the bus shelters. Some park users, as well as those using the sidewalk, may experience adverse impacts from this congestion, including pedestrians walking through the area to access the McPherson Square metro station. These visitors would experience long-term minor adverse impacts due to the congestion.

Similar to Alternative 2, Option B, the café would increase the number of staff regularly at Franklin Park. As a result of the increase in park amenities, there would be long-term beneficial and long-term minor adverse impacts to visitor use and experience.

PLAY AREAS

In Alternative 3, the addition of a children's play area and a tot lot to the northern part of the east lawn would provide residents in the area a place for their children to enjoy nature in a safe setting with proximity to downtown. The children's play area and tot lot would be separated to facilitate age-appropriate play areas, enhancing the safety and experience for users. The addition of a children's play area and tot lot would have a long-term beneficial impact to visitor use and experience.

TREE CANOPY

Under this alternative, 27 trees would be removed in addition to the 17 unhealthy trees recommended for removal under all action alternatives. There would be 43 new trees added for a total of 63% tree canopy cover. The newly planted trees would line the borders of the park on all sides and provide strategic shading, especially on the southern end of the park to allow for sufficient daylight and shade for café users and those enjoying the newly developed pedestrian mall. As a result, there would be long-term beneficial impacts to visitor use and experience.

CUMULATIVE IMPACTS

Impacts from other actions and projects in the cumulative impacts area of analysis would be the same as those described under the No Action Alternative, resulting in long-term beneficial impacts from increased mixed use developments and transportation projects in the vicinity of the park and short-term minor adverse impacts due to surrounding construction from these projects. The effects of these actions, in combination with the long-term beneficial impacts from Alternative 3, would result in long-term overall beneficial cumulative impacts on visitor use and experience.

CONCLUSION

Under Alternative 3, there would be short-term minor adverse impacts during construction. In the long-term, impacts to visitor use and experience at the park would be beneficial due to the addition of seasonal plantings, a play area, and café as well as the rehabilitation of the central water fountain and hardscaping throughout the park. In combination with the long-term beneficial impacts from other development and transportation projects in the area, there would be long-term beneficial cumulative impacts to visitor use and experience.

Cultural Resources

METHODOLOGY AND ASSUMPTIONS

The NPS categorizes cultural resources by the following categories: archeological resources, cultural landscapes, historic districts and structures, museum objects, and ethnographic resources. As noted in the "Issues and Impact Topics" section of "Chapter 1: Purpose and Need," impacts to cultural landscapes and historic districts and structures are of potential concern for this project. There would be no impacts to archeological resources, ethnographic resources, or museum objects, so these topics were dismissed from consideration.

The analyses of effects on cultural resources respond to the requirements of both NEPA and Section 106 of the NHPA. In accordance with ACHP regulations implementing Section 106 (36 CFR Part 800, *Protection of Historic Properties*), impacts on cultural resources were identified and evaluated by: (1) determining the APE; (2) identifying cultural resources present in the APE that are either listed in or eligible to be listed in the NRHP, i.e., historic properties; (3) applying the criteria of *adverse effect* to affected historic properties; and (4) considering ways to avoid, minimize, or mitigate adverse effects.

Under the implementing regulations for Section 106, a determination of either *adverse effect* or *no adverse effect* must also be made for affected historic properties. An *adverse effect* occurs whenever an impact alters any characteristic of a cultural resource that qualifies it for inclusion in the NRHP (e.g., diminishing the integrity of the resource's location, design, setting, materials, workmanship, feeling, or association). Adverse effects also include reasonably foreseeable effects caused by the proposal that would occur later in time, be farther removed in distance, or be cumulative. A determination of *no adverse effect* means there is either no effect or that the effect would not diminish in any way the characteristics of the cultural resource that qualify it for inclusion in the NRHP.

CEQ regulations DO-12: *Conservation Planning, Environmental Impact Analysis and Decision-making* (NPS 2001b) also call for a discussion of the appropriateness 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 NEPA only. Cultural resources are non-renewable 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, although actions determined to have an *adverse effect* under Section 106 may be mitigated, the effect remains adverse.

The NPS guidance for evaluating impacts (DO-12*: Conservation Planning, Environmental Impact Analysis, and Decision Making*; NPS 2001b) requires that impact assessment be scientific, accurate, and quantified to the extent possible. For cultural resources, it is seldom possible to measure impacts in quantifiable terms; therefore, impact thresholds must rely heavily on the professional judgment of resource experts.

Historic Structures and Districts and Cultural Landscapes

STUDY AREA

Based on consultation with the DC SHPO, the APE includes the half block including "catty corner" blocks for all blocks around Franklin Park. This area does not include any historic districts but it does include two historic structures: (a) Franklin School, and (b) the relocated Moorish revival façade of the Almas Temple. All other buildings surrounding Franklin Park are approximately 12-story office buildings of roughly uniform height and no historic significance. As indicated earlier, Franklin Park is also a contributing feature of the L'Enfant Plan of the City of Washington, listed as a structure in the NRHP.

Because the undertaking does not include an alteration of the street alignments, reservations, or other features that constitute the components of that structure, it was not considered necessary to include the larger territory encompassed by the L'Enfant Plan within the APE, and impacts to the L'Enfant Plan are not discussed below.

Impacts to the Almas Temple and the Franklin School would be limited to visual impacts from activities on the north side of the park (Almas Temple) and the east side of the park (Franklin School). Therefore, impacts to these historic resources are only discussed for alternative options that would occur in these sections of the park. All other options would have negligible impacts on historic districts and structures.

The proposed alternatives have the potential to impact character-defining features of one cultural landscape, the cultural landscape of Franklin Park itself. The park has been determined significant for its 1936 design under NRHP Criterion C. (See "Chapter 3: Affected Environment.") The proposed alternatives have the potential to impact design features of Franklin Park as defined in the CLI, completed by the NPS in 2005 and updated in 2011.

IMPACT THRESHOLDS

Character-defining features of a cultural landscape may include spatial organization and land patterns, topography, vegetation, circulation patterns, water features, structures/buildings, and small-scale objects. See the *Secretary of Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes* (Birnbaum 1996).

The thresholds of change for the intensity of an impact are defined in much the same manner for both cultural landscapes and historic districts and structures (see *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings)* (Weeks and Grimmer 1995). To analyze potential impacts on both types of historic resource, the thresholds of change for the intensity of an impact are defined as follows:

Negligible: The impact is at the lowest level of detection with neither adverse nor beneficial consequences. For purposes of Section 106, the determination of effect would be *no adverse effect*.

Minor: Preservation of landscape patterns and features would be in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes*, thereby maintaining the integrity of the cultural landscape. Alteration of a pattern(s) or feature(s) of a historic district or structure listed on or eligible for the NRHP would not diminish the integrity of a character-defining feature(s) or the overall integrity of the historic property. For purposes of Section 106, the determination of effect would be *no adverse effect*.

Moderate: The impact would alter a character-defining feature(s) of the cultural landscape and diminish the integrity of that feature(s) of the landscape. The impact would alter a character-defining feature(s) of a historic district or structure and diminish the integrity of that feature(s) of the historic property. For purposes of Section 106, the determination of effect would be *adverse effect*, but one which could be fairly easily avoided, minimized, or mitigated through an Agreement Document.

Major: The impact would alter a character-defining feature(s) of the cultural landscape and severely diminish the integrity of that feature(s) and the overall integrity of the historic property. The impact would alter a character-defining feature(s) of the historic district or structure and would severely diminish the integrity of that feature(s) and the overall integrity of the historic property. For purposes of Section

106, the determination of effect would be *adverse effect* and would present serious difficulty in avoiding, minimizing, or mitigating through an Agreement Document.

Beneficial: Preservation of landscape patterns and features would be in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes*, thereby maintaining the integrity of the cultural landscape. The character-defining features of the historic district or structure would be stabilized/preserved in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* to maintain its existing integrity. For purposes of Section 106, the determination of effect would be *no adverse effect*.

Duration: Short-term impacts are those lasting less than one year; long-term impacts are those lasting longer than one year.

The NPS, in its standard format for inventorying cultural landscapes, recognizes broad categories of landscape characteristics, which are then classified as contributing or non-contributing with regard to eligibility for the NRHP. These characteristics include views and vistas, buildings and structures, circulation, vegetation, topography, land use, spatial organization, small scale features, archeology, and constructed water features. The categories provide a wide overview of the cultural landscape, which incorporates cultural resources, such as buildings, structures, objects, and archeological sites that have traditionally been nominated individually for the NRHP as well as landscape features that have rarely been included. For Franklin Park, 10 categories of landscape features are represented by features that contribute to the resource's significance. As indicated in Chapter 2, archeological sites may be present, but at such a depth below the park's overlying fill that they could not be impacted by any of the alternatives and so need not be further considered.

Analysis of the impacts of the alternatives includes a coordinated NEPA/Section 106 process, which involved several meetings by the NPS with a broad spectrum of Consulting Parties. Impacts on cultural resources and other topics that resulted from the consultation meetings are given considerable weight in this EA. In terms of Section 106either Memorandum of Agreement or Programmatic Agreement will be written in consultation with the DC SHPO and consulting parties to avoid, minimize, and mitigate adverse impacts to historic properties.

The following more-detailed analysis is based upon the categories and specific features that are considered important for Franklin Park in the 2011 CLI described in further detail in "Chapter 3: Affected Environment" of this EA (NPS 2011).

Impacts of Alternative 1: No Action Alternative

ANALYSIS

The No Action Alternative represents a continuation of the existing condition, operation, and maintenance of the park. Social trails, which have decreased the grassy areas within the park, would continue, and these paths could be expected to increase in size and/or deteriorate further without intervention in the form of sodding or seeding. Current problems with the central fountain and its associated plumbing system would remain. The filtration system along with the structural and visible integrity of the fountain would continue to deteriorate over time, causing the fountain to become inoperable. Under the No Action Alternative, minor long-term adverse impacts to cultural landscapes would occur, the equivalent of no adverse effect under Section 106. The continued use of social trails would adversely impact the lawns of Franklin Park, and the condition of the fountain would continue to deteriorate without restoration. The lawns and the fountains are contributing features of the Franklin Park cultural landscape.

Table 4.1 describes the anticipated impacts of the No Action Alternative on each of landscape characteristics that contribute to the Franklin Park cultural landscape.

Table 4.1 – CLI Contributing Features – No Action Alternative

Type of Resource	Impact Analysis
Natural Systems and Features Impacts	None
Vegetation Impacts	Social trails would continue, causing damage to the park's open lawns.
Topography Impacts	None
Spatial Organization Impacts	None
Circulation Impacts	None
Topography Impacts	None
Buildings and Structures Impacts	None
Views and Vistas Impacts	None
Constructed Water Features Impacts	The 1936 fountain would not be restored, and deficiencies in the filtration system and the fountain's structure would continue, ultimately causing the fountain to be inoperable over time.

CUMULATIVE IMPACTS

The only future project that could impact cultural resources is the project to improve the Franklin School. The project would restore the school's exterior and interior features and transform the rehabilitated building into exhibit space for contemporary art, sculpture, installations, and performances. As the only historic building on the east side of Franklin Park and one of few in the immediate vicinity, the restoration of the exterior of the school would have long-term beneficial impacts on Franklin Park. The restoration of the building strengthens the integrity of the park through aspects of association, feeling, and setting.

Reasonably foreseeable projects on or around Franklin Park would provide long-term and beneficial impacts to historic districts and structures/cultural landscapes. The cumulative impact of these projects, when combined with the long-term minor adverse impacts of the No Action Alternative would still be minor long-term adverse, or no adverse effect under Section 106.

CONCLUSION

The No Action Alternative would result in long-term minor adverse impacts to cultural landscapes/historic districts and structures due to the deterioration of the lawns caused by social trails and the continuing decline in the condition of the 1936 fountain. The cumulative impact of these projects, when combined with the long-term minor impact of the No Action Alternative would be long-term minor adverse, or no adverse effect under Section 106.

Impacts of Alternative 2: The Center

ANALYSIS

CENTER PLAZA

Alternative 2 would retain the size and structure of the park's central plaza, including the ring of trees and plantings around the plaza. Seasonal plantings would be added around the edge of the plaza. These changes to the central plaza would have negligible impacts to the Franklin Park cultural landscape under Alternative 2. The size and structure of the central plaza would remain intact, and seasonal plantings

added to the edges of the plaza would not impact its design or the integrity of other contributing features of the cultural landscape.

CENTRAL WATER FEATURE

Under Alternative 2, the fountain, a contributing feature to the cultural landscape, would be restored and filtration, plumbing, and structural deficiencies would be eliminated. The restoration of the fountain would follow the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes.* Therefore, impacts would be long-term beneficial.

HARDSCAPE OPTIONS

Option A – The hardscape actions under Option A would modify the 1936 circulation system and spatial organization of the park, both of which are contributing features to the cultural landscape. The circulation and spatial organization would be altered through the addition of a small terrace on the east side of the park. Adverse impacts from the addition of the terrace would be lessened because the shape of the terrace would not change the existing pattern of the walks. Additionally, a terrace and lodge historically stood at this location, but were removed in 1974. Under Option B the historic pathways on the east and west sides of the fountain would be widened, but would follow the existing elliptical shape. The fabric of the internal pathways in the park would be removed and replaced with a more sustainable and durable material. The original walks were paved in bituminous surface on a concrete base, but were previously repaved with a thin layer of synthetic bituminous in 1976. Alterations under Option A would change aspects of the circulation system and spatial organization but would retain the overall symmetry and elliptical paths of the park. The addition of the terrace at the former location of the lodge is also in keeping with the park's historic design and spatial organization. Because this action would not diminish the overall integrity of the character-defining features of the Franklin Park cultural landscape or the park itself, impacts would be long-term minor adverse.

The addition of the terrace on the east side of the park would be visible from the Franklin School, a historic structure. A lodge and surrounding terrace historically stood at this location from 1914 until the lodge was demolished in 1974. Additionally, the terrace would supplement the circulation system and respect the spatial organization of the east side of the park. Therefore, Option A would have negligible adverse impacts on historic districts and structures.

Option B – Similar to Option A, Option B would alter the 1936 circulation system and spatial organization of the park through the addition of a semi-circular terrace on the north side of the park. Adverse impacts from the construction of the terrace would be minimized because the form of the terrace would follow the existing curvilinear pattern of the walk. This option, like Option A, would also widen historic pathways on the eastern and western sides of the fountain, and the existing surface paving all internal pathways would be replaced. Therefore, Option B would have long-term minor adverse impacts to the cultural landscape. Although new hardscaping would be added, the paving would follow the existing historic circulation pattern and would not diminish the integrity of the circulation system and spatial organization of the park. The original materials of the internal walks have been enhanced with a thin layer of synthetic bituminous surface poured on top. The addition of the terrace would provide a new visual element to the north side of the park. This option would have a long-term negligible impact on the Almas Temple because the proposed terrace would follow the existing pattern of the walk and would not alter the overall setting of the temple.

CAFÉ AND BASIC AMENITIES OPTIONS

Option A – Under Option A, no café structure or related amenities would be constructed in the park. Existing 1936 benches, contributing features, would be retained. The existing Saratoga lights, which are non-contributing, but compatible replica features, could be shifted and would be supplemented throughout the park with similar Saratoga style lights or other complementary fixtures. Part of the 1930s rehabilitation of the park, these lights were replaced in the 1960s and the current lights, replicas of the

originals, were installed in the early 1990s. A Although additional lights would be added, the lights would be similar in design to the existing Saratoga lights and have long-term negligible adverse impact on the cultural landscape.

Option B – In Option B, an 1,800-square-foot café would be built on the northern edge of the park within the terrace described in Option B. Similar to Option A, supplemental Saratoga style or similar complementary lights would be erected. The addition of a new, non-historic structure within the park would result in long-term moderate adverse impact to the cultural landscape. The structure would block views toward the fountain from the north side of the park and alter the park's overall spatial relationship.

PLAY AREAS

Under Alternative 2, a play area would be added within the eastern ellipse of the park. The construction of the play area would require regrading the site, which would alter the park's topography, a contributing feature. Historically, the park was noted for its "undulating character," which contrasted with the level turf of Lafayette Park. Currently, the only level areas of the park are in the center, around the fountain, at the location of the Barry statue, and on the east side of the park at the former location of the lodge. Regrading would create additional level areas within the park. The addition of the play areas would also diminish the elliptical lawn on the east side of the fountain, an important part of the park's vegetation and spatial organization. The park is defined by its three ellipses that create large, open lawns and the play area would occupy the majority of the eastern ellipse, eliminating the open, grassy lawn and the symmetry of the open spaces. Thus, the addition of a play area would have long-term moderate adverse impacts on the cultural landscape of Franklin Park.

TREE CANOPY OPTIONS

OPTION A – Option A would not result in the loss of any of the pre-1936 trees. Although the existing tree cover would be reduced, it would not impact the historic vegetation of the Franklin Park cultural landscape.

Option B – Option B would remove two pre-1936 trees, resulting in a long-term minor adverse impact on the cultural landscape. Although historic trees would be lost, the vegetation of the park would continue to retain integrity to contribute to the cultural landscape of the park.

Table 4.2 describes the anticipated impacts of Alternative 2 on each of the landscape characteristics that contribute to the Franklin Park cultural landscape.

Cumulative Impacts

As explained for the No Action Alternative, reasonably foreseeable projects on or around Franklin Park would result in long-term and beneficial impacts to historic districts and structures/cultural landscapes. The cumulative impact of these projects, when combined with the long-term moderate impact of Alternative 2, would be long-term moderate adverse, or adverse effect under Section 106.

CONCLUSION

Alternative 2 would result in long-term moderate adverse impacts to historic districts and structures/cultural landscapes. The integrity of several landscape features would be slightly diminished, yet the Franklin Park cultural landscape would retain sufficient overall integrity. The cumulative impact of these projects, when combined with the long-term minor impact of the No Action Alternative would be moderate long-term adverse, the equivalent of adverse effect under Section 106.

Table 4.2 – CLI Contributing Features – The Center

Type of Resource	Impact Analysis
Natural Systems and Features Impacts	None
Vegetation Impacts	**Option A:** No pre-1936 trees would be removed. **Option B:** Two pre-1936 trees would be removed. **Play Areas:** The addition of a play area would result in a loss of the lawn on the east side of the fountain.
Topography Impacts	**Play Areas:** The addition of a play area would change the topography of the eastern portion of the park.
Spatial Organization Impacts	**Option A**: None. **Option B:** The spatial organization of the park would change through the addition of the café structure on the north side of the park.
Circulation Impacts	**Option A:** Circulation would be altered through the addition of a terrace on the east side of the park, but impacts would be minimized by its location within the historic pathways. **Option B:** Circulation would be altered through the addition of a terrace on the north side of the park, but impacts would be minimized by its location within the historic elliptical pathway.
Buildings and Structures Impacts	None
Views and Vistas Impacts	**Option B:** The addition of the café would alter interior views from the northern edge of the park towards the fountain.
Constructed Water Features Impacts	**Central Water Feature:** The 1936 fountain would be restored.
Small-Scale Features	**Café and Basic Amenities Options:** The 1930s-era benches would be supplemented with removable seating and additional benches in complementary style. ADA accessible arm rests may be added. The Saratoga style lights may be shifted from their original location and may be supplemented with additional Saratoga style or other complementary fixtures.

Impacts of Alternative 3: The Edge

ANALYSIS

CENTER PLAZA

Under Alternative 3, the ring of tree planters in the central plaza would be removed and paved, increasing the total usable surface area of the plaza. Seasonal plantings would be added around the outer perimeter of the plaza, and new seating options would be added to the plaza's inner edge. The curvilinear planting areas were part of the 1936 design of the park and contain willow oaks, planted during the 1936 improvements made to the park. Removing the planting areas and adding seating areas would alter the design of the central plaza and result in the loss of six pre-1936 trees. Impacts would be mitigated because the overall elliptical shape of the plaza would remain. Changes to the center plaza under Alternative 3 would result in long-term moderate adverse impacts to the cultural landscape.

CENTRAL WATER FEATURE

As part of Alternative 3, the 1936 fountain would be removed and redesigned. The new fountain would keep the overall shape and form and, where possible, reuse the historic fabric of the existing fountain. The coping that surrounds the fountain would be raised to provide additional seating. The fountain is the centerpiece of the 1936 landscape of Franklin Park. The redesign of the fountain would result in the loss of the 1936 fountain, resulting in a long-term moderate impact because it would diminish the integrity of the fountain and the overall integrity of the cultural landscape. The severity of the impacts would be mitigated through the redesign process and through the continuation of the fountain's original shape and the use of historic fabric where possible.

HARDSCAPE

Under Alternative 3, a rectangular up to a 40-foot-wide pedestrian mall would be constructed along the southern edge of the park. Planters, separated by access points, would border the south side of the pedestrian mall, and a new curvilinear walk would be constructed north of the mall, providing pedestrian access to the center plaza. The addition of the mall would result in the removal of the curvilinear walks along the southern edge of the site that mirror similar walks on the north side of the central plaza. Consequently the pedestrian mall would alter the symmetrical spatial organization of the park and result in the loss of sections of the existing circulation system. Alterations to the circulation system would also change views from the southern edge of the park. Although the fountain would remain visible, the vantage point from the existing, semi-circular walk would be removed. Thus, the hardscape option under Alternative 3 would result in the alteration of several character-defining features of the cultural landscape and diminish the overall integrity of the cultural landscape. Impacts would be mitigated through the addition of engravings on the walks that provide a timeline of events pertinent to the park's history and/or the history of water use in the park. Although the new hardscaping would eliminate historic walks and the park's axial layout, the design of the mall, walk, and plantings would have a symmetrical design that is compatible with the overall design of the park. Alterations to the circulation system would also minimize, if not eliminate, the use of social trails because the new curvilinear walk would provide a diagonal access point to the center plaza.

CAFÉ AND BASIC AMENITIES

As part of Alternative 3, a café structure would be built on the southern edge of the park. The café would be positioned off center within one of the planting areas. The addition of a café would introduce a new, non-historic structure to the park in a location that historically did not have a park structure. The site of the café was chosen in part because it would not obstruct views from the southern edge of the park towards the fountain. The addition of the structure would be further mitigated through close coordination and consultation with the CFA and DC SHPO on its design and by ensuring that the construction of the café is conducted in a manner consistent with *The Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for the Treatment of Cultural Landscapes* (Birnbaum 1996). Similar to Alternative 2, the 1936-era benches would be removed and replaced as part of this option. The Saratoga style lights could be shifted and supplemented with additional Saratoga style or complementary lights. Changes to the cultural landscape as part of this option due to the addition of a structure and the loss of small-scale features would result in long-term moderate adverse impacts on the cultural landscape.

PLAY AREAS

Similar to Alternative 2, a play area would be added within the eastern ellipse of the park under this alternative; however, the area would also include a tot lot on the northern portion of the lawn. The addition of these areas would require regrading of the site that would alter the park's topography, a contributing feature. The addition of the play areas would also diminish the elliptical lawn on the east side of the fountain, an important part of the park's vegetation and spatial organization. Thus, the addition of the play areas would have long-term moderate adverse impacts on the cultural landscape of Franklin Park.

TREE CANOPY

As part of Alternative 3, a total of 34 trees would be removed, including 7 that were planted before 1936. There are currently 18 remaining trees in the park that were planted prior to 1936, and the loss of almost half of the historic trees would result in a long-term moderate adverse impact to the cultural landscape. The loss of these trees would diminish the integrity of the historic vegetation, a contributing feature to the cultural landscape.

Table 4.3 describes the anticipated impacts of Alternative 3 on each of landscape characteristics that contribute to the Franklin Park cultural landscape.

Table 4.3 – CLI Contributing Features – The Edge

Type of Resource	Impact Analysis
Natural Systems and Features Impacts	None
Vegetation Impacts	**Tree Canopy:** Seven pre-1936 trees would be removed from the park. **Play Areas:** The play area and tot lot would result in a loss of the open lawn on the east side of the fountain.
Topography Impacts	**Play Areas:** The addition of a play area and tot lot would alter the topography of the eastern portion of the park.
Spatial Organization Impacts	**Café and Basic Amenities:** The spatial organization of the park would change through the addition of the café structure on the south side of the park.
Circulation Impacts	**Central Plaza:** Impacts would be minimized by a planting area on the outside of the plaza that includes both trees and plantings to create a sense of intimacy. **Hardscape:** The circulation system would be altered through the addition of the pedestrian mall on the southern edge of the park. Impacts would be minimized though its symmetrical design, a reduction in the use of social trails through the addition of a new curvilinear walk, and the addition of engravings that provide information on the history of the park.
Buildings and Structures Impacts	None
Views and Vistas Impacts	**Hardscape /Café and Basic Amenities:** The addition of the café and the alteration of the walks along the southern portion of the park would alter interior historic views from the southern edge of the park towards the fountain.
Constructed Water Features Impacts	**Central Water Feature:** The 1936 fountain would be replaced with a new fountain. Impacts would be minimized by keeping the same overall shape as the existing fountain and by incorporating historic fabric where possible.
Small-Scale Features	**Café and Basic Amenities:** The 1930s-era benches would be supplemented with removable seating and additional benches in complementary style. ADA-accessible arm rests may be added. The Saratoga style lights may be shifted from their original location and may be supplemented with additional Saratoga style or other complementary fixtures.

CUMULATIVE IMPACTS

As explained for the No Action Alternative, reasonably foreseeable projects on or around Franklin Park are long-term and beneficial to historic districts and structures/cultural landscapes. The cumulative impact of these projects, when combined with the long-term moderate impact of Alternative 3, would be moderate long-term adverse, the equivalent of adverse effect under Section 106.

CONCLUSION

Alternative 3 would result in long-term moderate adverse impacts to historic districts and structures/cultural landscapes. The integrity of several landscape features would be diminished, and the overall integrity of the Franklin Park cultural landscape would be lessened. These impacts would be mitigated through the development of a Section 106 agreement document in consultation with the Section 106 consulting parties. The cumulative impact of these projects, when combined with the long-term minor impact of the Alternative 3, would be long-term moderate adverse, the equivalent of adverse effect under Section 106.

Public Safety and Accessibility

METHODOLOGY AND ASSUMPTIONS

This section provides an analysis of public safety risks to park employees and the general public that could be associated with hazards in the project area, as well as the proposed construction, maintenance, and implementation of park programming. This analysis also considers the overall security and accessibility of the project site, including that of the park staff and visitors. Impacts for this resource area are analyzed qualitatively, using information provided by team research and NPS staff familiar with the current security and maintenance within the project area.

STUDY AREA

The study area includes Franklin Park, located between K and I Street NW and 14th and 13th Streets NW.

IMPACT THRESHOLDS

Impact thresholds are as follows.

Negligible: The impact on public safety and accessibility would not be measurable or perceptible.

Minor: The impact on public safety and accessibility would be detectable but would not have an appreciable effect on overall public safety and accessibility. Individuals could be affected in a localized area. If mitigation were needed, it would be relatively simple and would likely be successful.

Moderate: The impact on public safety and accessibility would be readily apparent and result in substantial, noticeable effects on public safety on a local scale. Mitigation measures would probably be necessary and would likely be successful.

Major: The impact on public safety and accessibility would be readily apparent and result in substantial, noticeable effects on public safety and accessibility on a regional scale. Extensive mitigation measures would be needed, and success would not be guaranteed.

Duration: Short-term impacts would be immediate, occurring during implementation of the alternative. Long-term impacts would persist after implementation of the alternative.

Where impacts on public safety and accessibility become moderate, it is assumed that current visitor satisfaction and safety levels would begin to decline, and some of the park's long-term visitor goals would not be achieved if no mitigation were carried out.

Impacts of Alternative 1: No Action Alternative

ANALYSIS

The extensive deterioration of the bituminous path pavement laid over the existing concrete pathways throughout the park would continue, creating more uneven walking surface and increasing the risk of tripping and safety concerns. Snow and ice removal during the winter months would continue to be performed to reduce tripping hazards due to the winter elements.

Under the No Action Alternative, the park would continue to be poorly lit due to the heavy shading from the full tree canopy and lack of sufficient artificial light at night, resulting in poor night-time visibility.

Franklin Park would continue to have only one at-grade, ADA-accessible entrance to the central fountain and plaza located on the west side. Metal edging used to surround planting areas within the park would continue to protrude above grade in numerous locations. This edging would continue to pose a tripping hazard and prevent universal accessibility between the pathways and the lawn panels. The numerous

existing social trails would remain, and their continued high intensity use would pose more tripping hazards resulting in long-term minor adverse impacts to safety and accessibility.

The continuation of existing conditions under the No Action Alternative would have long-term minor adverse impacts on safety and accessibility at Franklin Park.

CUMULATIVE IMPACTS

All actions proposed within the vicinity of Franklin Park, such as the Marriot Marquis, City Center DC, Franklin School, MoveDC, K Street Corridor Streetcar, and North-South Corridor Streetcar projects, would improve facilities surrounding the site. Crime around Franklin Park could have an impact on property values of the surrounding developments and, therefore, these projects would have an vested interest in improving the sense of safety in the park. Additionally, the added foot traffic in the vicinity of the park would result in increased visitation to the park and surrounding areas. More eyes are expected to be on the park for a longer period of time, resulting in a reduction of perceived illegal activities occurring within and around the park. Therefore, these neighborhood developments would have a long-term beneficial impact on safety and accessibility. However, added foot traffic generated by these developments through Franklin Park would have minor long-term adverse impacts on the already deteriorating pedestrian pavement surfaces. The long-term minor adverse impacts of the No Action Alternative, when combined with the long-term minor adverse and beneficial impacts of other past, present, and reasonably foreseeable actions, would result in long-term minor adverse and beneficial cumulative impacts to public safety and accessibility.

CONCLUSION

The No Action Alternative would have long-term minor adverse impacts on human safety and accessibility from continued deteriorating conditions and perceived safety concerns. When combined with the overall long-term minor adverse and beneficial impacts from the cumulative actions, the No Action Alternative would have long-term minor adverse and beneficial cumulative impacts.

Impacts of Alternative 2: The Center

ANALYSIS

During the construction period under Alternative 2, all construction workers and employees would follow an approved health and safety plan that would incorporate all applicable regulations. Barriers and signs would be used around the construction sites to divert the public from potentially dangerous situations. In addition, public announcements would be made on the park website and in the media to alert the public to the construction schedule and locations. Therefore, short-term impacts would be minor adverse.

CENTER PLAZA

Under Alternative 2, the existing size and structure of the central plaza would be retained, with added seasonal plantings along the perimeter of the plaza, which would not impact public safety and accessibility.

CENTRAL WATER FEATURE

Under Alternative 2, the deficiencies in the current fountain system would be addressed, replacing the existing filtration and plumbing system, and in turn providing visitors with clean, filtered water. The physical structure of the fountain would also be renovated while retaining the current form and shape. This would allow visitors to safely access the fountain instead of perching on the existing crumbling structure. There would be a long-term beneficial impact on safety and accessibility through these proposed updates as an updated filtration system and fountain structure would provide a safer water feature for park users.

HARDSCAPE OPTIONS

Option A – The addition of a small, rectangular terrace and the widening of the eastern sidewalk would have a beneficial impact on the accessibility to park visitors because it would provide a designated space for food truck patrons, thus reducing conflicts between pedestrians walking on the sidewalk and those waiting for their food or eating lunch. The widening of the southern sidewalk would provide more circulation space for pedestrians and a larger designated area for those waiting for buses on I Street NW. These improvements would result in long-term beneficial impacts to safety and accessibility. Similar to the No Action Alternative, there would continue to be only one ADA-accessible pathway to the center plaza, resulting in long-term minor adverse impacts to accessibility.

Option B – Similar to Option A, the addition of a slightly larger rectangular terrace and the widening of the eastern sidewalk would have a beneficial impact on the accessibility to park visitors because it would reduce conflicts between pedestrians walking on the sidewalk and those waiting for their food or eating lunch. The widening of the southern sidewalk would provide more circulation space for pedestrians and a larger designated area for those waiting for buses on I Street NW. These improvements would result in long-term beneficial impacts to safety and accessibility. Similar to the No Action Alternative, there would continue to be only one ADA-accessible pathway to the center plaza, resulting in long-term minor adverse impacts to accessibility.

CAFÉ AND BASIC AMENITIES OPTIONS

Option A – No café structure or amenities would be added to the park. Therefore, there would be no impacts on safety and accessibility.

Option B – The addition of a café structure would enable 18-hour programming at the park. This option is expected to result in increased visitation and park staffing, and more eyes would be on the park for a longer period of time, which could increase the perception of public safety within and around the park. Reduction in perceived illegal activities would result in long-term beneficial impacts to public safety.

PLAY AREAS

Similar to Option B, the addition of a play area would result in increased visitation and more eyes on the park resulting in a reduction of perceived illegal activities occurring within and around the park and long-term beneficial impacts to public safety.

TREE CANOPY OPTIONS

Option A – This option would both remove and replant trees, resulting in tree canopy cover of 73% of the project area, thus allowing more natural light through, and, in turn, increasing visibility in the park especially in the central plaza area. Therefore, there would be long-term beneficial impacts to public safety.

Option B – Similar to Option A, this option would reduce the tree canopy to 71% allowing more natural light through and, in turn, increasing visibility in the park, especially in the central plaza area. The increase in visibility would result in long-term beneficial impacts to public safety.

CUMULATIVE IMPACTS

Impacts of developments in the vicinity of the park on safety and accessibility would be the same as those described under the No Action Alternative, resulting in long-term minor adverse and beneficial impacts. However, unlike the No Action Alternative, Alternative 2 would improve the condition of the existing pedestrian pathway system and provide mitigation for the added foot traffic from these developments. There would be long-term beneficial impacts on safety and accessibility as a result of the rehabilitated pedestrian pathway, renovated fountain, addition of hardscape available for programming, and removal of trees from the existing canopy. These long-term beneficial and minor adverse impacts, when combined with the short-term minor adverse and long-term beneficial and minor adverse impacts from Alternative

2, would result in overall short-term minor adverse and long-term beneficial and minor adverse cumulative impacts to safety and accessibility.

CONCLUSION

Alternative 2 would result in short-term minor adverse impacts during construction and long-term beneficial and minor adverse impacts on safety and accessibility at Franklin Park due to improved perceptions of safety and visibility, but lack of improved accessibility to the central plaza. When combined with the overall long-term minor adverse and beneficial impacts from the cumulative actions, Alternative 2 would have long-term minor adverse and beneficial cumulative impacts to public safety and accessibility.

Impacts of Alternative 3: The Edge

ANALYSIS

Similar to Alternative 2, there would be short-term moderate adverse impacts to public safety and accessibility during construction of Alternative 3. However, mitigation measures, including the adherence to health and safety plans, barriers and signs, and public announcements, would mitigate the impacts to short-term minor adverse.

CENTER PLAZA

Under Alternative 3, the existing size and structure of the central plaza would be retained, but the existing ring of trees and plantings on the plaza would be removed. This increase in plaza space would improve visibility and activate the central plaza, which would have a beneficial impact on safety. A ring of seasonal plantings would be added to the perimeter of the plaza, and seating options would be added to the inner edge of the central plaza. Alternative 3 would therefore result in long-term beneficial impact on safety and accessibility.

CENTRAL WATER FEATURE

Under this alternative, the deficiencies in the current fountain system would be addressed, replacing the existing filtration and plumbing system, and, in turn, providing visitors with clean, filtered water. There would be long-term beneficial impact on safety and accessibility because the updated filtration system and newly constructed fountain structure would provide cleaner water and a safer structure for park users.

HARDSCAPE OPTIONS

Under Alternative 3, the widening of the eastern sidewalk and the eastern terrace space would have a beneficial impact on the accessibility to park visitors because it would provide a designated space for food truck patrons, thus reducing conflicts between pedestrians walking on the sidewalk and those waiting for their food or eating lunch. The addition of a southern pedestrian mall would provide seating space for café patrons (who become natural surveillance), more circulation space for pedestrians, and would provide a larger designated area for those waiting for buses on I Street NW. Unlike the No Action Alternative and Alternative 2, Alternative 3 would construct an additional ADA-accessible pathway to the center plaza, bringing the total ADA-accessible pathways into the central plaza up to two. All these proposed actions would result in beneficial impacts to park safety and accessibility.

CAFÉ AND BASIC AMENITIES OPTIONS

The addition of a café structure would create an 18-hour activity site-plan intended for the park. Similar to Alternative 2, Option B, this alternative would result in increased visitation and park staffing, resulting in more eyes on the park for a longer period of time, and an increased perception of safety within and around the park. Increased perception of safety and reduction in perceived illegal activities would result in long-term beneficial impacts to public safety.

PLAY AREAS

Similar to Alternative 2, the addition of a play area and tot lot would result in increased visitation and more eyes on the park, resulting in an increased perception of safety and reduction of perceived illegal activities within and around the park and long-term beneficial impacts to public safety.

TREE CANOPY OPTIONS

Alternative 3 would remove and replant trees, resulting in a tree canopy cover of 63%, allowing more natural light through, which would increase visibility in the park especially in the central plaza area. Therefore, Alternative 3 would result in long-term beneficial impacts to park safety.

CUMULATIVE IMPACTS

Impacts of developments in the vicinity of the park on safety and accessibility would be the same as those described under the No Action Alternative and Alternative 2, resulting in long-term beneficial and minor adverse impacts. Similar to Alternative 2, Alternative 3 would also improve the condition of the existing pedestrian pathway system and provide mitigation for the added foot traffic from these developments. There would be long-term beneficial impacts on safety and accessibility as a result of the rehabilitated pedestrian pathway, renovated fountain, reduced tree canopy, and addition of hardscape available for programming. Additionally, this alternative would pave the existing dirt-path desire lines created by the high number of pedestrians walking diagonally to and from the residential area to the northeast of the site to the Metro station at the southwestern corner of the site. This northeast--southwest route would also be made ADA-accessible. Both of these actions would result in beneficial impacts to accessibility. These long-term beneficial and minor adverse impacts, when combined with the short-term minor adverse and long-term beneficial impacts resulting from Alternative 3, would result in overall short-term minor adverse and long-term beneficial cumulative impacts to public safety and accessibility.

CONCLUSION

Alternative 3 would result in short-term minor adverse impacts during construction and long-term beneficial impacts on safety and accessibility at Franklin Park due to improved perceptions of safety and visibility and improved access to the central plaza. When combined with the overall long-term minor adverse and beneficial impacts from the cumulative actions, Alternative 3 would have short-term minor adverse and long-term beneficial cumulative impacts to public safety and accessibility.

Park Management and Operations

METHODOLOGY AND ASSUMPTIONS

For this analysis, park management and operations refers to effectiveness of the park staff to maintain and administer park resources and facilities and to provide for a quality visitor experience. This includes an analysis of the condition and maintenance of the facilities and concessioners used to support park operations. Park staff who are knowledgeable of these issues were members of the planning team that evaluated the impacts of each alternative. The impact analysis is based on the current description of park operations presented in "Chapter 3: Affected Environment."

Impacts for this resource area are analyzed qualitatively, using information provided by the National Mall and Memorial Parks and Park service staff familiar with the current operation, and maintenance within the project area.

STUDY AREA

The study area for park operations and management includes Franklin Park between K and I Streets NW and 14th and 13th Streets NW.

IMPACT THRESHOLDS

Impact thresholds are as follows.

Negligible: Park operations would not be impacted or the impact would not have a noticeable or appreciable impact on park operations.

Minor: Impacts would be noticeable, but would be of a magnitude that would not result in an appreciable or measurable change to park operations.

Moderate: Impacts would be readily apparent and would result in a substantial change in park operations that would be noticeable to staff and the public. Mitigation could be required and may be effective.

Major: Impacts would be readily apparent and would result in a substantial change in park operations that would be noticeable to staff and the public and would require the park to readdress its ability to sustain current park operations.

Duration: Short-term impacts are those lasting during the period of construction; long-term impacts are those that would occur after construction is complete.

Impacts of Alternative 1: No Action Alternative

ANALYSIS

Under the No Action Alternative, the National Mall and Memorial Parks' maintenance staff would continue to perform a majority of the day-to-day labor to maintain the park, while resource management staff would continue to perform all pest control services. Under an existing contract, a private landscaping company would continue to provide mowing, edging, weed control, and leaf removal services for the entire park unit, including Franklin Park. The DowntownDC BID would continue to provide services to enhance maintenance, programming, and visitor experience in Franklin Park. The DowntownDC BID would also continue to assign safety/hospitality and maintenance staff to provide some general maintenance and hospitality services, such as picking up trash and litter, providing way-finding and other information to the public, additional maintenance when needed, and administration of free public programming such as weekday workouts in the park.

Under the No Action Alternative, the improvements, rehabilitation, and redesign of Franklin Park would not occur. The existing park softscape (lawns, plantings, and trees) would continue to be maintained

following the current schedule. Seasonal plantings would be maintained accordingly. Limited maintenance of the fountain would continue. Snow and ice removal would continue to be performed during the winter months. The existing social trails would remain and would continue to deteriorate. Park staff would continue to maintain Franklin Park in its current state resulting in long-term negligible adverse impacts to park management and operations.

CUMULATIVE IMPACTS

Several past, present, and future construction or rehabilitation projects exist within the area surrounding Franklin Park, including the construction of the Marriot Marquis, ongoing construction of City Center DC, and the future rehabilitation of the Franklin School. These developments would result in an increase in residents and visitors to the area and could increase visitation at Franklin Park. The potential increase in visitors to the park would increase maintenance requirements such as trash pickup and turf restoration due to increased foot traffic resulting in long-term negligible adverse impacts to park management and operations. These long-term negligible adverse impacts, when combined with the long-term negligible adverse impacts resulting from the No Action Alternative, would result in overall long-term negligible adverse cumulative impacts to park management and operations.

CONCLUSION

Overall, the No Action Alternative would have long-term negligible adverse impacts on park operations and management as a result of continued maintenance activities. Cumulative impacts would result in long-term negligible adverse impacts to the local area as a result of increased visitation and the corresponding increase in maintenance.

Impacts of Alternative 2: The Center

ANALYSIS

Alternative 2 would retain much of the existing historical spatial symmetry and context of the park. Construction activities related to Alternative 2 are expected to last approximately one year. During this time, portions of Franklin Park would be closed to the public, and minimal staff members would be needed for maintenance or operations. However, existing staff maintain all of the parks under the National Mall and Memorial Parks and would remain employed, resulting in beneficial impacts to overall National Mall and Memorial Parks operations and maintenance. Once construction is completed, there are at least two scenarios for future park operations and maintenance.

Scenario #1 – The project partners or another defined entity would supplement responsibility for future park operations and maintenance and provide a method for revenue generation/collection that could be used to provide this higher level of service. Partners would maintain the park to NPS standards at a minimum. Partners would also be required to meet the maintenance and operation needs of the park with a minimum requirement of maintaining current levels of operations and maintenance. In this scenario, current park staff would no longer solely have operations and maintenance responsibilities and would have increased availability to maintain other portions of National Mall and Memorial Parks, resulting in beneficial impacts to park operations and maintenance.

Scenario #2 – Park staff would continue to be the primary maintenance provider at Franklin Park, while being supported minimally by DowntownDC BID -assigned staff. In this scenario, park staff would retain full operations and maintenance responsibilities. There would be long-term minor and beneficial impacts to park operations and maintenance, as described below:

CENTER PLAZA

The existing size and structure of the central plaza would be retained, with the addition of the proposed seasonal plantings along the perimeter of the plaza. Additional maintenance would be required for these

plantings such as weeding, watering, and edging, resulting in long-term negligible adverse impacts to park operations and maintenance.

CENTRAL WATER FEATURE

Under this element of Alternative 2, the deficiencies in the current fountain system would be addressed, replacing the existing filtration and plumbing system. The physical structure of the fountain would also be renovated while retaining the current form and configuration. There would be a beneficial impact to park operations and maintenance because the proposed fountain improvements, including updated filtration system and fountain structure, would require less upkeep.

HARDSCAPE OPTIONS

Option A –The turf removed as a result of the construction of a small, rectangular terrace and widened sidewalks would slightly lessen the landscaping maintenance required because there would be less turf to mow, water, weed, edge, and maintain. Therefore, this option would result in a beneficial impact to park operations and maintenance.

Option B –The turf removed as a result of the construction of the semi-circle terrace and widened sidewalks would lessen the landscaping maintenance required because there would be less turf to mow, water, weed, and maintain. Therefore, this option would result in a long-term beneficial impact to park operations and maintenance.

CAFÉ AND BASIC AMENITIES OPTIONS

Option A – No café structure or amenities would be added to the park. Therefore, there would be no impacts to park operations and maintenance.

Option B – The construction of the café and amenities would result in an increase in park operations and maintenance needs. These facilities would be part of an 18-hour programming schedule intended for the park. The structural additions would have subsequent need for an increase in staffing, additional trash and litter removal, restroom cleaning and maintenance, additional programming, cleaning and maintenance of the café's tables and chairs, and staff to provide wayfinding and information to the public. This option would result in long-term minor adverse impacts to park management and operations.

PLAY AREAS

Under this element of Alternative 2, a children's play area would be added to the northern part of the east lawn. The play area would require regular maintenance of playground equipment and trash and litter removal, resulting in long-term minor adverse impacts to park management and operations.

TREE CANOPY OPTIONS

Option A – Option A would reduce the tree canopy cover to 73% of the project area. The removal of trees would lessen operation and maintenance needs because there would be less tree care required in the form of watering, pruning, and root maintenance, resulting in long-term beneficial impacts to park operations and maintenance.

Option B – Option B would reduce the tree canopy cover to 71% of the project area. Similar to Option A, the removal of trees would lessen operation and maintenance needs because there would be less tree care required, resulting in long-term beneficial impacts to park operations and maintenance.

CUMULATIVE IMPACTS

Similar to the No Action Alternative, past, present, and reasonably foreseeable projects would result in an increase in residents and visitors to the area and could result in increased visitation at Franklin Park. The potential increase in visitors to the park would increase maintenance requirements such as trash pickup and turf restoration due to increased foot traffic, resulting in long-term negligible adverse impacts to park management and operations. These long-term negligible adverse impacts, when combined with the short-

term negligible adverse and long-term minor adverse and beneficial impacts resulting from the Alternative 2, would result in overall long-term minor adverse cumulative impacts to park management and operations.

CONCLUSION

Implementation of Alternative 2 would result in short-term negligible adverse impacts on park operations and management as a result of construction activities. However, there would be long-term beneficial impacts on park operations and management because of the improvements made to the fountain and reduction in turf and tree maintenance required. The increase in amenities and associated staffing and maintenance needs would result in long-term minor adverse impacts to park management and operations. However, if an agreement with the park partners was reached, then there would be long-term beneficial impacts to park management and operations. Cumulative impacts would result in long-term minor adverse impacts to the local area as a result of increased visitation and the corresponding increase in maintenance.

Impacts of Alternative 3: The Edge

ANALYSIS

Construction activities related to Alternative 3 would be expected to last approximately one year. Similar to Alternative 2, Franklin Park would be closed to the public, and no staff members would be needed for maintenance or operations. However, existing staff maintain all of the parks under the National Mall and Memorial Parks and would remain employed, resulting in beneficial impacts to overall National Mall and Memorial Parks operations and maintenance. Similar to Alternative 2, once construction is completed, there would be two scenarios for future park operations and maintenance.

Scenario #1 – As described under Alternative 2, the project partners would take over responsibility for future park operations and maintenance, resulting in beneficial impacts to park operations and maintenance.

Scenario #2 – Park staff would continue to be the primary maintenance provider at Franklin Park, while being supported minimally by DowntownDC BID -assigned staff. In this scenario, park staff would retain full operations and maintenance responsibilities and, therefore, from this perspective, there would be long-term moderate adverse impacts to park operations and maintenance. Impacts under the no-agreement scenario resulting from Alternative 3 are described below:

CENTER PLAZA

Under Alternative 3, the existing size and structure of the central plaza would be retained, but the existing ring of trees and plantings on the plaza would be removed. A ring of seasonal plantings would be added to the perimeter of the plaza. There would be added maintenance required for these plantings, such as weeding, watering, and replanting. However, due to the removal of the existing ring of trees and plantings within the plaza, the resulting total level of maintenance required would likely remain the same, resulting in long-term negligible adverse impacts to park operations and maintenance.

CENTRAL WATER FEATURE

Alternative 3 would address the deficiencies in the current fountain system through a redesign of the existing fountain. A new fountain of similar size with an interactive element would be constructed in its place. As a result, there would be long-term beneficial impacts to park management and operations as an updated filtration system and fountain structure would require less upkeep.

HARDSCAPE OPTIONS

Under Alternative 3, the turf removed as a result of the construction of the pedestrian mall, widened sidewalks, and small paved area would reduce the landscaping maintenance required because there would

be less turf to mow, water, weed, and maintain. Therefore, there would be long-term beneficial impacts to park management and operations.

CAFÉ AND BASIC AMENITIES OPTIONS

The construction of the café and associated amenities would increase in park operations and maintenance needs. These facilities would be part of the 18-hour activity site-plan intended for the park. The structural additions and extended programming would require an increase in staffing, additional trash and litter removal, restroom cleaning and maintenance, cleaning and maintenance of the café's tables and chairs, and staff to provide wayfinding and information to the public, resulting in long-term minor adverse impacts to park management and operations.

PLAY AREAS

Alternative 3 would include the addition of a combination children's play area and tot lot that would require regular maintenance of playground equipment and trash and litter removal, resulting in long-term minor adverse impacts to park management and operations.

TREE CANOPY OPTIONS

Alternative 3 would reduce the tree canopy cover to 63% of the project area. Similar to Alternative 2, the removal of trees would reduce operation and maintenance needs because there would be less tree care required. However, the impact would be greater than under Alternative 2 because more trees would be removed under this alternative, which would result in long-term beneficial impacts to park operations and maintenance.

CUMULATIVE IMPACTS

Similar to the No Action Alternative, past, present, and reasonably foreseeable projects would result in an increase in residents and visitors to the area and could result in increased visitation at Franklin Park. The potential increase in visitors to the park would increase maintenance requirements such as trash pickup and turf restoration due to increased foot traffic, resulting in long-term negligible adverse impacts to park management and operations. These long-term negligible adverse impacts, when combined with the short-term negligible adverse and long-term negligible to minor adverse and beneficial impacts resulting from the Alternative 3, would result in overall long-term minor adverse cumulative impacts to park management and operations.

CONCLUSION

Implementation of Alternative 3 would result in short-term negligible adverse impacts on park operations and management as a result of construction activities. However, there would be long-term beneficial impacts on park operations and management due to the improvements made to the fountain and reduced requirements for turf and tree maintenance. The increase in amenities and their associated staffing and maintenance needs would result in long-term negligible to minor adverse impacts to park management and operations. However, if an agreement with the park partners was reached, then there would be long-term beneficial impacts to park management and operations. Cumulative impacts would result in long-term minor adverse impacts to the local area as a result of increased visitation and a corresponding increase in maintenance.

CHAPTER 5: CONSULTATION AND COORDINATION

The NPS places a high priority on public involvement in NEPA process and on giving the public an opportunity to provide input and comment on proposed actions. As part of the NPS NEPA and section 106 process, issues associated with the proposed action were identified during the internal scoping meeting held with NPS and have been communicated to other affected agencies and stakeholders. Coordination with local and federal agencies was conducted during the NEPA process to identify issues and/or concerns related to natural and cultural resources at Franklin Park. The NPS conducted a public meeting to solicit input and comment from members of the public. The meeting was held on November 7, 2014, at the Four Points Sheraton in Washington, D.C., from 6 p.m. to 8 p.m. A second public meeting was held on February 19, 2014, at the Hilton Garden Inn, Washington, D.C., from 6 pm to 8 pm to provide information to the public about the design alternatives and gather public input regarding the alternatives. These public scoping efforts are described in more detail in "Chapter 1: Purpose and Need."

Compliance with Section 106 of the NHPA, as amended, included consultation with the DC SHPO, ACHP, CFA, and NCPC. In addition, a number of agencies, organizations, stakeholders, including members of the public, were invited to participate in this process as consulting parties throughout the Section 106 process. As part of the on-going consultation, the NPS and the partners presented alternative concepts to the CFA, the NCPC, and the DC SHPO on June 25, 2014, at the CFA. Additionally, NPS and partners provided an informational presentation to NCPC on September 4, 2014. The CFA approved the revised alternative (see Appendix A for its detailed approval letter). The NPS began formal consultation with the DC SHPO on September 5, 2013 (see Appendix A); coordination and consultation are ongoing.

In accordance with Section 7 of the Endangered Species Act, the park requested, on September 6, 2013, an updated list of rare, threatened, and endangered species known to be present in the project area. By letter dated November 12, 2013, the USFWS responded that other than transient species, no proposed or federally listed species are known to exist in the project area.

Comment Period

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

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Acronyms

Advisory Council on Historic Preservation	(ACHP)
American Community Survey	(ACS)
Americans with Disabilities Act	(ADA)
Architectural Barriers Act	(ABA)
Architectural Barriers Act Accessibility Standard	(ABAAS)
Area of Potential Effect	(APE)
Choosing by Advantages and Value Analysis	(CBA/VA)
Code of Federal Regulation	(CFR)
Commission of Fine Arts	(CFA)
Council on Environmental Quality	(CEQ)
Combined Sewer Overflow	(CSO)
Cultural Landscape Inventory	(CLI)
Director's Order	(DO)
District of Columbia Office of Planning	(DCOP)
District Department of the Environment	(DDOE)
District Department of Transportation	(DDOT)
Downtown Business Improvement District	(DowntownDC BID)
District of Columbia Historic Preservation Office	(DC SHPO)
District of Columbia Water and Sewer Authority	(DC Water)
Environmental Assessment	(EA)
Executive Order	(EO)
Finding of No Significant Impact	(FONSI)
Leadership in Energy and Environmental Design	(LEED)
Maryland Transit Administration	(MTA)
Memorandum of Understanding	(MOU)
National Capital Region	(NCR)
National Capital Planning Commission	(NCPC)
National Environmental Policy Act	(NEPA)
National Historic Landmark	(NHL)
National Historic Preservation Act	(NHPA)
National Park Service	(NPS)
National Parks Omnibus Management Act	(NPOMA)
National Register of Historic Places	(NRHP)
Northwest	(NW)
Partners for Economic Solutions	(PES)
Planning, Environment, and Public Comment website	(PEPC)
Potomac & Rappahannock Transportation Commission	(PRTC)
Programmatic Agreement	(PA)
Public Law	(PL)
Public Works Administration	(PWA)
Region of Influence	(ROI)
Safety/Hospitality and Maintenance	(SAM)
State Historic Preservation Officer	(SHPO)
Traditional Cultural Property	(TCP)

United States Code	(USC)
United States Commission of Fine Arts	(CFA)
United States Department of Agriculture	(USDA)
United States Fish and Wildlife Service	(USFWS)
Washington Metropolitan Area Transit Authority	(WMATA)

Key Word Glossary

Affected Environment — The existing environment to be affected by a proposed action and alternatives.

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

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

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

Cultural Landscape – Environments that include natural and cultural resources associated with a historical context.

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

Cumulative Impacts — Under NEPA regulations, the incremental environmental impact or effect of an action together with the effects of past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions (40 CFR §1508.7).

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

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

Environmental Assessment — An environmental analysis prepared pursuant to NEPA to determine whether a federal action would significantly affect the environment and thus require a more detailed environmental impact statement.

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

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

Impairment—The NPS requires an analysis of potential effects to determine whether actions would impact or impair Park resources. The NPS is empowered with the management discretion to allow impacts on Park resources and values (when necessary and appropriate) to fulfill the purposes of a Park, as long as the impact does not constitute impairment of the affected resources and values.

Magnetometer – A walkthrough metal detector used for security in public facilities.

National Environmental Policy Act — The act, as amended, articulates the federal law that mandates protecting the quality of the human environment. It requires federal agencies to systematically assess the environmental impacts of their proposed activities, programs, and projects including the No Action Alternative of not pursuing the proposed action. NEPA requires agencies to consider alternative ways of accomplishing their missions in ways which are less damaging to the environment.

National Historic Preservation Act of 1966 (16 USC 470 et seq.) — An Act to establish a program for the (PL 89-665; 80 STAT. 915; 16 USC 470, as amended by PL 91-243, PL 93-54, PL 94-422, PL 94-458, PL 96-199, PL 96-244, PL 96-515, PL 98-483, PL 99-514, PL 100-127, and PL 102-575).

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

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

Scoping — Scoping, as part of NEPA, requires examining a proposed action and its possible effects; establishing the depth of environmental analysis needed; and determining analysis procedures, data needed, and task assignments. The public is encouraged to participate and submit comments on proposed projects during the scoping period.

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

Viewshed — A viewshed includes a total visible area from a particular fixed vantage point.

Vista— A distant or long view, especially one seen through some opening such as an avenue or trees that form an avenue.

APPENDIX A: CONSULTATION AND CORRESPONDENCE

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United States Department of the Interior

NATIONAL PARK SERVICE
National Mall & Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024–2000

September 6, 2013

Ms. Genevieve LaRouche
Field Supervisor
Chesapeake Bay Field Office
U.S. Fish and Wildlife Service
177 Admiral Cochrane Drive
Annapolis, MD 21401

Subject: Franklin Park Environmental Assessment

Dear Ms. LaRouche:

The National Park Service (NPS), the District of Columbia, and the Downtown Business Improvement District are planning to revitalize Franklin Park, located between K and I Streets N.W. and 13th and 14th Streets N.W. in downtown Washington, D.C. At nearly five acres, Franklin Park is well-situated in the increasingly populated Center City DC and provides a unique opportunity to serve the community and enhance urban living.

Currently the park does not meet today's diverse urban needs; however, there is the potential to transform Franklin Park into one of our nation's premier urban parks. To realize this dramatic transformation, NPS and its partners believe that an inclusive design process and a bold approach to improvements and programming are necessary to create a great park that can attract and serve users.

NPS and its partners are beginning to develop a comprehensive plan and conceptual design for transforming Franklin Park. In accordance with the National Environmental Policy Act of 1969 (NEPA), the NPS is preparing an Environmental Assessment (EA) to evaluate these proposed actions. The EA will address the project background, the purpose and need for the proposed actions, a determination of environmental issues and potential impacts resulting from the alternatives considered (including the no action alternative), and public involvement and agency coordination.

We are writing you to request a list of federally listed species that may be impacted by the proposed project and to initiate informal Section 7 consultation. Because of its location in a highly urbanized environment in downtown Washington, DC, it is unlikely that the proposed improvements would affect any federally listed or locally sensitive species. However, NPS would appreciate written confirmation from your office.

If there are any questions or if there is a need for additional information, please contact James Perry, Chief of Resource Management at 202-245-4711 or via email at james_perry @nps.gov.

Sincerely,

for Robert A. Vogel
Superintendent
National Mall and Memorial Parks
National Park Service

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office
177 Admiral Cochrane Drive
Annapolis, Maryland 21401
http://www.fws.gov/chesapeakebay

November 12, 2013

United States Department of the Interior
National Park Service
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000

RE: Franklin Park Environmental Assessment

Dear Robert A. Vogel:

This responds to your letter, received September 6, 2013, requesting information on the presence of species which are federally listed or proposed for listing as endangered or threatened in the above referenced project area. We have reviewed the information you enclosed and are providing comments in accordance with section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Except for occasional transient individuals, no proposed or federally listed endangered or threatened species are known to exist within the project impact area. Therefore, no Biological Assessment or further section 7 consultation with the U.S. Fish and Wildlife Service is required. Should project plans change, or should additional information on the distribution of listed or proposed species become available, this determination may be reconsidered.

This response relates only to federally protected threatened or endangered species under our jurisdiction. Limited information is currently available regarding the distribution of other rare species in the District of Columbia. However, the Nature Conservancy and National Park Service (NPS) have initiated an inventory of rare species within the District. For further information on such rare species, you should contact Tanya Shenk of the National Park Service at (970) 267-2193.

Effective August 8, 2007, under the authority of the Endangered Species Act of 1973, as amended, the U.S. Fish and Wildlife Service (Service) removed (delist) the bald eagle in the lower 48 States of the United States from the Federal List of Endangered and Threatened Wildlife. However, the bald eagle will still be protected by the Bald and Golden Eagle Protection Act, Lacey Act and the Migratory Bird Treaty Act. As a result, starting on August 8, 2007, if your project may cause "disturbance" to the bald eagle, please consult the "National Bald Eagle Management Guidelines" dated May 2007.

If any planned or ongoing activities cannot be conducted in compliance with the National Bald Eagle Management Guidelines (Eagle Management Guidelines), please contact the Chesapeake Bay Ecological Services Field Office at 410-573-4573 for technical assistance. The Eagle Management Guidelines can be found at:
http://www.fws.gov/northeast/ecologicalservices/pdf/NationalBaldEagleManagementGuidelines.pdf

In the future, if your project can not avoid disturbance to the bald eagle by complying with the Eagle Management Guidelines, you will be able to apply for a permit that authorizes the take of bald and golden eagles under the Bald and Golden Eagle Protection Act, generally where the take to be authorized is associated with otherwise lawful activities.

An additional concern of the Service is wetlands protection. Federal and state partners of the Chesapeake Bay Program have adopted an interim goal of no overall net loss of the Basin's remaining wetlands, and the long term goal of increasing the quality and quantity of the Basin's wetlands resource base. Because of this policy and the functions and values wetlands perform, the Service recommends avoiding wetland impacts. All wetlands within the project area should be identified, and if alterations of wetlands is proposed, the U.S. Army Corps of Engineers, Baltimore District, should be contacted for permit requirements. They can be reached at (410) 962-3670.

We appreciate the opportunity to provide information relative to fish and wildlife issues, and thank you for your interests in these resources. If you have any questions or need further assistance, please contact Trevor Clark at (410) 573-4527.

Sincerely,

G. LaRouche

Genevieve LaRouche
Supervisor

United States Department of the Interior

NATIONAL PARK SERVICE
National Mall & Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024–2000

September 6, 2013

Mr. Reid Nelson
Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW Suite 803
Washington, D.C. 20004

Subject: Franklin Park Environmental Assessment/Section 106 of the National Historic Preservation Act

Dear Mr. Nelson:

The National Park Service (NPS) has initiated consultation with the District of Columbia State Historic Preservation Officer under Section 106 of the National Historic Preservation Act on the planned revitalization and enhancement of Franklin Park, located between K and I Streets N.W. and 13th and 14th Streets N.W. in downtown Washington, D.C. Additionally, NPS is currently preparing an Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969. Its partners in the development of a new comprehensive plan for Franklin Park are the District of Columbia and the Downtown Business Improvement District.

Currently the park does not meet today's diverse urban needs; however, there is the potential to transform Franklin Park into one of our nation's premier urban parks. To realize this dramatic transformation, NPS and its partners believe that an inclusive design process and a bold approach to improvements and programming are necessary to create a great park that can attract and serve users.

NPS and partners are beginning to develop a comprehensive plan and conceptual design for transforming Franklin Park into a premier active, flexible, and sustainable historic urban park connected to its community. The proposed plan is the subject of the EA and constitutes an undertaking under Section 106. NPS is, of course, aware of the historical significance of Franklin Park and is committed to maintaining and protecting its historic character and any other historic resources that may be affected by the proposed action. We hope that the proposed revitalization and enhancement will result a long-term beneficial effect, consistent with the park's mission of preserving cultural and natural resources.

We have included a draft area of potential effect (APE) with this letter. Please review the APE and forward to us any comments that you may have. At this early stage, we are unable to make any determination of effect. NPS plans to coordinate the Section 106 and NEPA processes to the

greatest extent possible and to use the NEPA public scoping process to fulfill the requirement to take the views of the public into account. However, we do not intend to utilize the regulatory path of "substituting" the EA for Section 106. We also do not currently anticipate the need for the direct participation of the Council under the Council's regulations that trigger direct participation. However, NPS welcomes your office's oversight and participation to any extent that the Council deems warranted.

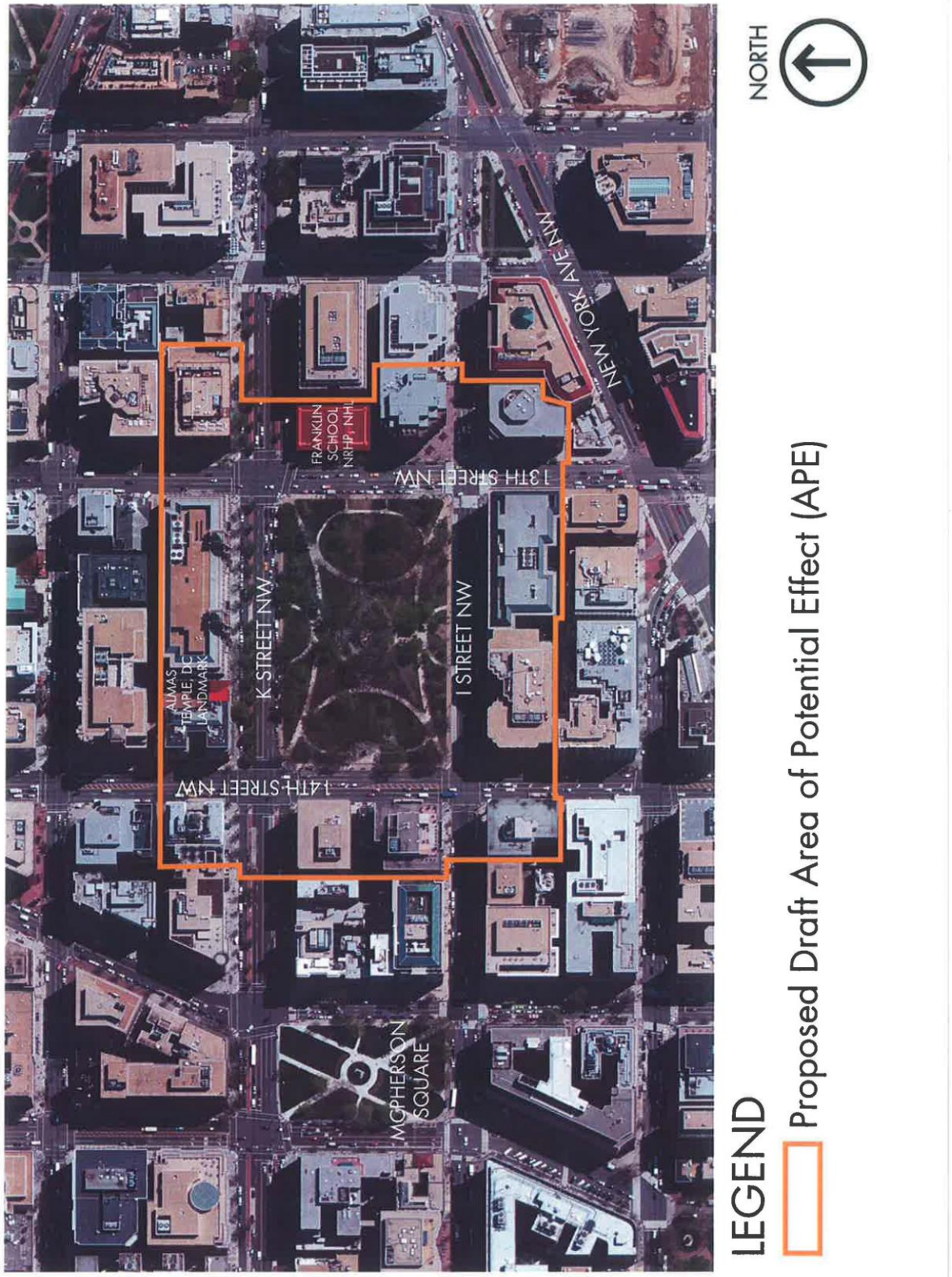
NPS will present an overview of the project at a public scoping meeting on October 2, 2013 from 6:00 PM to 8:00 PM at the Four Points by Sheraton at 1201 K Street, NW, Washington, D.C. and would be pleased to have you or a member of your staff attend and furnish comments.

A copy of the draft EA will be provided to your office for review when it becomes available. We anticipate further consultation with the DC SHPO, as mandated by Section 106.

If there are any questions or if there is a need for additional information, please contact James Perry, Chief of Resource Management at 202-245-4711 or via email at james_perry @nps.gov.

Sincerely,

Robert A. Vogel
Superintendent
National Mall and Memorial Parks
National Park Service


NORTH
LEGEND
Proposed Draft Area of Potential Effect (APE)
MCPHERSON SQUARE
14TH STREET NW
K STREET NW
I STREET NW
13TH STREET NW
NEW YORK AVE NW
FRANKLIN SCHOOL NRHP, NHL
AUMAS TEMPLE, DC LANDMARK

United States Department of the Interior

NATIONAL PARK SERVICE
National Mall & Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000

September 6, 2013

Mr. David Maloney
State Historic Preservation Officer
District of Columbia Office of Planning
1100 Fourth Street S.W., Suite E650
Washington, D.C. 20024

Subject: Franklin Park Environmental Assessment/Section 106 of the National Historic Preservation Act

Dear Mr. Maloney:

The National Park Service (NPS), the District of Columbia, and the Downtown Business Improvement District are planning to revitalize Franklin Park, located between K and I Streets N.W. and 13th and 14th Streets N.W. in downtown Washington, D.C. At nearly five acres, Franklin Park is well-situated in the increasingly populated Center City DC and provides a unique opportunity to serve the community and enhance urban living. In accordance with the National Historic Preservation Act, as amended, the NPS is writing to formally initiate consultation with your office. We have identified the plan and its future proposals as an undertaking which may have effects upon historic properties on or eligible for the National Register of Historic Places.

Currently the park does not meet today's diverse urban needs; however, there is the potential to transform Franklin Park into one of our nation's premier urban parks. To realize this dramatic transformation, NPS and its partners believe that an inclusive design process and a bold approach to improvements and programming are necessary to create a great park that can attract and serve users.

NPS and its partners are beginning to develop a comprehensive plan and conceptual design for transforming Franklin Park. In accordance with the National Environmental Policy Act of 1969 (NEPA), the NPS is preparing an Environmental Assessment (EA) to evaluate these proposed actions.

At this early stage, we are unable to make any determination of effect. We have included a draft area of potential effect (APE) with this letter. Please review the APE and forward to us any comments that you may have. Although we plan to coordinate the Section 106 and NEPA processes to the greatest extent possible and to use the NEPA scoping process to solicit public comments, we anticipate further consultation with consulting parties as the plan develops.

The NPS will present an overview of the project at a public scoping meeting on October 2, 2013 from 6:00 PM to 8:00 PM at the Four Points by Sheraton at 1201 K Street, NW, Washington, D.C. and would be pleased to have you or a member of your staff attend and furnish comments.

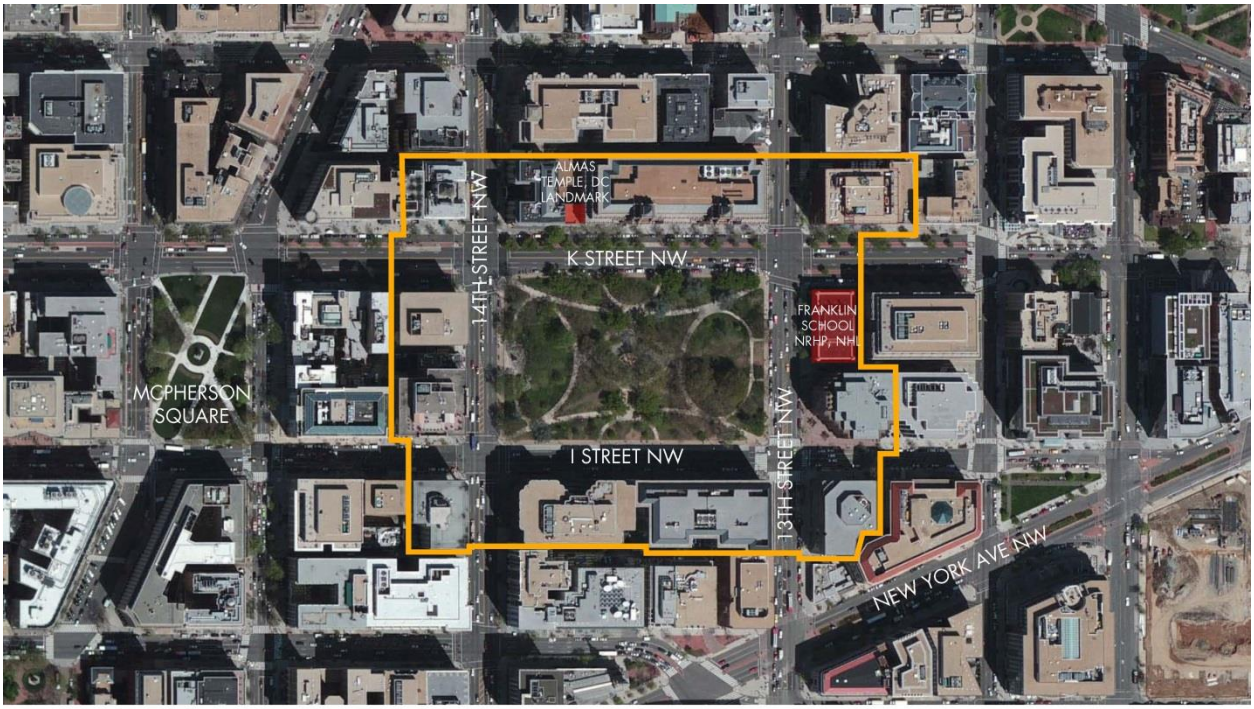
The NPS is aware of the historical significance of Franklin Park and is committed to maintaining and protecting its historic character and any other historic resources that may be affected by the proposed action. We hope that the proposed revitalization and enhancement will result a long-term beneficial effect, consistent with the park's mission of preserving cultural and natural resources.

A copy of the draft EA will be provided to your office for review when it becomes available, and we anticipate further consultation with your office as mandated by Section 106.

If there are any questions or if there is a need for additional information, please contact James Perry, Chief of Resource Management at 202-245-4711 or via email at james_perry @nps.gov.

Sincerely,

Robert A. Vogel
Superintendent
National Mall and Memorial Parks
National Park Service



LEGEND

Proposed Draft Area of Potential Effect (APE)

NORTH

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER

November 21, 2013

Mr. Robert A. Vogel, Superintendent, National Mall and Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, DC 20024-2000

RE: Initiation of Section 106 Consultation for the Rehabilitation/Revitalization of Franklin Park/Franklin Square

Dear Mr. Vogel:

Thank you for formally initiating consultation with the DC State Historic Preservation Office (SHPO) regarding the above-referenced undertaking. We are writing in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, to provide our initial comments regarding effects on historic properties.

Based upon a review of your recent submittal, our participation in the first Technical Advisory Meeting held on September 5, 2013, and the two prior site visits we conducted with representatives from the National Park Service and various interested parties, we understand that the undertaking proposes to "transform Franklin Park into one of our nation's premier urban parks" by making substantial improvements and updating programming so that the space will meet contemporary needs for urban parks. We support the proposed approach, but stress the importance of ensuring that the project is implemented in a manner that will be compatible with the historic character of the park.

As you are aware, Franklin Park (also known as Franklin Square, Reservation No. 9, Fountain Square, and City Square 249) is a contributing element of the National Register of Historic Places-listed Plan of the City of Washington (L'Enfant Plan). We recommend that it be specifically identified as a "historic property" on the draft Area of Potential Effect (APE) map which was submitted for our review.

On a related note, all of the streets surrounding Franklin Park are contributing elements of the L'Enfant Plan. Historic views and vistas associated with these streets should be considered in the evaluation of effects, but since Franklin Park was not originally intended to be a park and was, instead, established primarily so that its natural springs could provide water to the White House, no views or vistas terminate directly on any feature of the park.

Other National Register-listed properties within the APE include the statue of Commodore John Barry on the west end of the park and the Tower Building at the northwest corner of 14th and K Streets, NW. Even though the Champlain /Orme Building at 1424 K Street, NW and the Masonic Temple/Museum of Women in the Arts Building at 1250 New York Avenue, NW are just outside of the proposed APE, we recommend that they be documented on the map as a reminder to consider any potential, though unlikely, effects that the undertaking may have on these historic properties. With these modifications incorporated, we believe that the proposed APE will be sufficient to take into account the direct and indirect effects of the undertaking on historic properties. If necessary, the APE can be modified at a later date to include other areas where unanticipated effects might occur.

1100 4th Street, SW, Suite E650, Washington, D.C. 20024 Phone: 202-442-7600, Fax: 202-442-7638

Although a list of consulting parties was not included with your submittal, we understand that the NPS has been working in close partnership with the Downtown Business Improvement District and our colleagues in the DC Office of Planning to ensure that all interested parties are provided ample opportunities to review and comment on the proposed revitalization efforts. We also understand that the NPS will be coordinating its Section 106 and National Environmental Policy Act (NEPA) reviews, that the first public scoping meeting was held on October 2, 2013, and that additional Technical Advisory Meetings are scheduled in the near future. In order to meet the requirements of 36 CFR 800.2, however, we recommend that all parties which have an interest in the potential effects of the undertaking on historic properties be documented in a formal list of consulting parties.

With regard to archaeology, we understand that a Phase IA assessment will be conducted on the square. We recommend that geoarchaeological work be conducted as a component of the Phase IA in order to provide information regarding the depth of any potential resources. Such information would be very useful in identifying ways to avoid potential sites and/or areas where additional archaeological investigations may be necessary if avoidance is not possible.

We look forward to consulting further with all parties to continue the Section 106 review of this undertaking. In the meantime, please contact me at andrew.lewis@dc.gov or 202-442-8841if you should have any questions or comments regarding this matter/the historic built environment. Questions or comments relating to archaeology should be directed to Ruth Trocolli at ruth.trocolli@dc.gov or 202-442-8836. Thank you for providing this initial opportunity to review and comment.

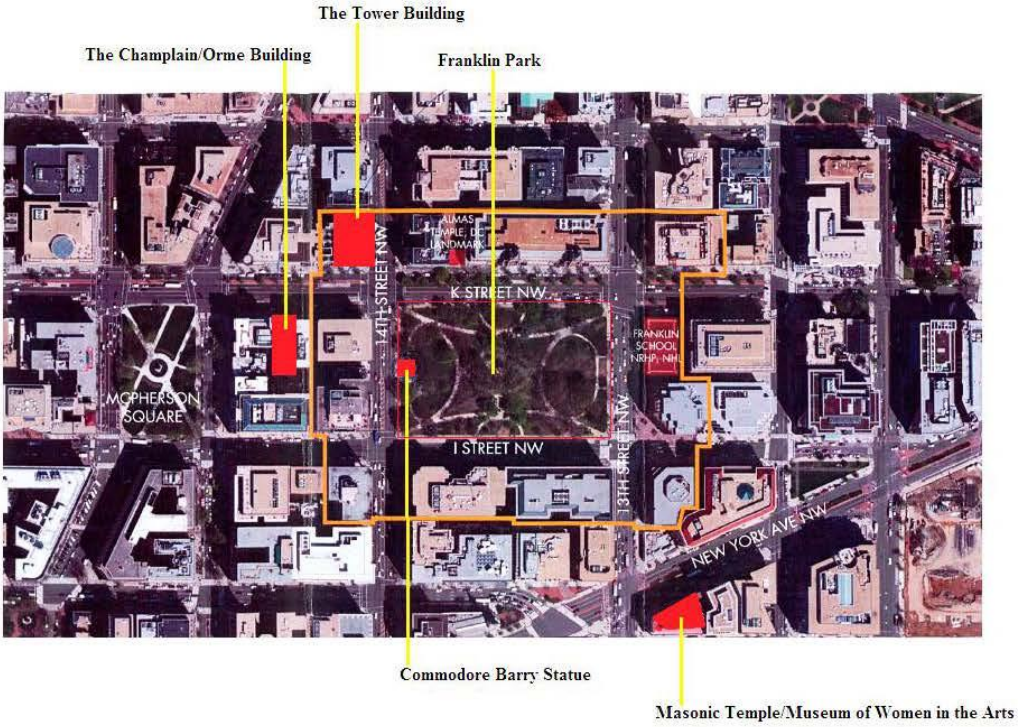
Sincerely,

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

13-014

1100 4th Street, SW, Suite E650, Washington, D.C. 20024 Phone: 202-442-7600, Fax: 202-442-7638

FRANKLIN PARK AREA OF POTENTIAL EFFECT



National Capital Planning Commission 401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel: 202.482.7200 Fax: 202.482.7272 www.ncpc.gov

IN REPLY REFER TO:
NCPC File No. 7545

November 22, 2013

Ms. Eliza Voigt
National Mall & Memorial Parks
National Park Service, National Capital Region
900 Ohio Drive, SW
Washington, DC 20024

Re: Scoping Comments for the Environmental Assessment on the Franklin Park Vision and Transformation Plan

Dear Ms. Voigt,

Thank you for the opportunity to serve on the project's technical advisory committee and provide scoping comments for the preparation of an Environmental Assessment (EA) for the Franklin Park Project. We understand that the National Park Service (NPS) will be the lead agency in the preparation of the EA as well as conduct consultation under Section 106 of the National Historic Preservation Act. As the central planning agency for the federal government in the National Capital Region, NCPC has review and approval authority related to the overall project under the National Capital Planning Act (40 USC § 8722 (b) (1) and (d)).[1] Prior to taking an action on the project, NCPC will need to satisfy the requirements of NEPA and therefore we request to be a cooperating agency on the EA. NCPC will also be required to satisfy the requirements of Section 106 of the National Historic Preservation Act and as the consultation moves forward, NCPC may elect to designate NPS as lead agency to fulfill our collective Section 106 responsibilities. Should the project result in adverse effects on historic properties, NCPC will seek to become a signatory to the Memorandum of Agreement negotiated through the Section 106 consultation.

Franklin Park sits at the heart of downtown Washington, DC and serves as a gathering place for a range of stakeholders. Surrounded by food trucks and office workers at lunch, and home to a variety of afternoon and evening programs, it is a hub of energy for the neighborhood. While this area consists mainly of commercial land uses, there has been a recent introduction of mixed-use and residential land uses nearby. In addition, "City Center," one of the largest active urban redevelopment projects in the United States, will soon be opening just three blocks to the east of the park at 9th and I Streets, NW. City Center will add over 600 new residential units, 500,000 square feet of office space, and a destination retail center to the area. Cumulatively, these changes will undoubtedly add pressure to Franklin Park's aging infrastructure and increase maintenance needs. These changes may also create competing priorities with the homeless support services provided in the park. This EA process is an opportunity to improve services and amenities to all user groups.

[1] The Planning Act requires federal and District of Columbia agencies to advise and consult with NCPC in the preparation of agency plans prior to preparation of construction plans.

With the last major redesign in 1936, now is the time to envision a Franklin Park able to accommodate a variety of urban recreational needs. NCPC recognizes the challenges NPS faces in the management and activation of urban parks, many of which would benefit from dynamic programming but are limited due to existing regulations. The Downtown DC Business Improvement District has acknowledged the need for enhancements, and now provides a variety of programs to help activate and maintain the site as a formal NPS partner. In addition, the city recognizes the growing number of residents and visitors in need of recreational amenities, and is an active partner in the process to improve the park.

The need for improvements to Franklin Park have been well-documented over the years. The *CapitalSpace Initiative* report identifies the need to enhance all of the center city parks, with Franklin Square highlighted as a model project. The report recognizes that new parkland, especially in the downtown area, is difficult to acquire. Therefore, existing parks should be redesigned and programmed to accommodate a wide variety of user groups. The *Monumental Core Framework Plan* and *Center City Action Agenda* also recognize the need for an enhanced public realm that accommodates the rapidly increasing downtown residential population.

NCPC requests that the EA assess the potential direct, indirect, and cumulative impacts of the project on the following topic areas:

- Historic Resources
- Visual Resources
- Socioeconomic Resources, including planning policies, public space, and visitor experience
- Parks and Open Space, including operations, maintenance and partnerships
- Natural Features, including vegetation and wildlife habitat
- Utility Infrastructure, including sustainable stormwater and energy management
- Human Health and Safety during demolition, construction, and operation including issues of hazardous materials, air quality, and noise
- Transportation, Access, and Circulation, including vehicular, public transit, pedestrian/cyclist, parking, and urban design character
- Visitor Use and Experience

NCPC has particular concerns related to Historic Resources, Parks and Open Space and Transportation, Access and Circulation, that we have outlined below.

Historic Resources

Franklin Park is a contributing feature of the *L'Enfant Plan of the City of Washington*. The park has a number of historic resources that should be accommodated in any future design alternatives. NCPC is confident that future design alternatives will respect the historic significance of this park while adding the urban vitality necessary to attract residents, workers and visitors. The Cultural Landscape Inventory (CLI) prepared by NPS identifies a number of contributing features, most notably the central fountain, benches, Saratoga lights, retaining wall, and the Commodore John Barry Monument and pedestal. NCPC requests that the timing of the Section 106 consultation be closely coordinated with the EA so that the input of the District of Columbia State Historic Preservation Officer and other consulting parties can be incorporated into the EA analysis.

NCPC looks forward to working with NPS, the District of Columbia State Historic Preservation Officer, and other stakeholders to avoid, minimize, and mitigate adverse effects on historic properties. Efforts to avoid and minimize effects on Franklin Park and the L'Enfant Plan are of great concern to NCPC and the analysis in the EA should highlight which alternative minimizes impacts to these significant historic resources.

Parks and Open Space

The National Park Service's mission "preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education and inspiration of this and future generations." As the steward of this federal park, NPS must ensure Franklin Square retains and enhances the natural and cultural elements that allow this park to serve the federal interest. In addition, NCPC hopes to see a long-term partnership formed between NPS, the District of Columbia and the Downtown DC BID to allow this park to also function in the local interest. Enhanced programming and maintenance could further develop Franklin Park's unique character and make it a destination for a variety of user groups. NCPC hopes to see this partnership replicated in other Center City parks where joint consideration of federal and local interests could yield a dynamic urban park experience for all.

The *CapitalSpace Initiative* report advocates for enhancing Center City parks. Recommendations relevant to the Franklin Park project include:

- Utilize placemaking and programming to expand recreational opportunities.
- Incorporate sustainable design features, low-impact development, and other greening techniques into new and existing parks and park improvements.
- Research, identify, and reinforce historical design elements as defining characteristics of Center City parks, including the use of elements like rounded curbs, fences, and benches that have been used historically in Center City parks.
- Use elements such as public art, landscaping, sidewalk concessionaires, outdoor seating, street furniture, and special paving as a way to connect events and activities in parks to adjacent spaces and the surrounding neighborhood.
- Research and define historical significance, and build an understanding and appreciation of the park and neighborhood history through increased signage, promotions, programming, and other opportunities.
- Pursue changes to laws, regulations, and policies for both District and NPS parks within the Center City to allow greater flexibility in programming and appropriate concessions that would encourage additional public use within the parks and adjacent right-of-way.

Transportation, Access and Circulation

Parks surrounded by streets face access challenges. Franklin Park's adjacency to two major streets (14th Street and K Street) will only exacerbate this issue on the north and west sides. It is critical for the EA to analyze and evaluate the current and proposed transportation systems and circulation patterns, especially the planned changes to K Street. NCPC recommends improvements to crosswalks, as well as consideration of visual and physical connections beyond park boundaries and onto the adjacent sidewalks.

These comments have been prepared in accordance with NCPC's Environmental and Historic Preservation Policies and Procedures. We refer NPS to NCPC's Comprehensive Plan for the National Capital for policies and guidelines for which the Franklin Park Project will be evaluated against. The Comprehensive Plan as well as other NCPC plans and policies can be found on our website at www.ncpc.gov; hard copies are available if needed.

We look forward to working with you on this project. If you have any questions, please contact Sarah Moulton at (202) 482-7269 or sarah.moulton@ncpc.gov.

Sincerely,

P.P.

Elizabeth Miller, AICP, ASLA
Director, Physical Planning Division

cc: Christine Saum, Director, Urban Design and Plan Review Division, NCPC
David Maloney, State Historic Preservation Office, District of Columbia
Thor Nelson, Urban Planner, Office of Planning, District of Columbia

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910

401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

24 July 2014

Dear Mr. Whitesell:

In its meeting of 17 July, the Commission of Fine Arts reviewed alternative concepts for the rehabilitation of Franklin Park, a square in the L'Enfant city bounded by 13th, 14th, I, and K Streets, NW. The Commission expressed strong support for the project team's preferred option and approved this concept with several recommendations for the development of the design.

The Commission members commented that the preferred scheme builds upon the historic configuration of Franklin Park while allowing diagonal circulation through the site and providing new areas for programming. Noting the laudable desire to introduce new programs and amenities to the park, they encouraged balancing the needs of a wide range of visitors using this public space. They observed that the playground would be a new element with a potentially strong visual impact within the landscape, and they recommended paying careful attention to the design of this area to ensure its compatibility with the park as a whole. They acknowledged the site's rich history, suggesting emphasis on its natural spring as the inspiration for the central fountain and as the focus of limited historic interpretation.

The Commission looks forward to further review of this project and requested further information on the design of the park's many elements—such as the pavilion, paving, fountain, and lighting—as the project is developed for the next submission. As always, the staff is available to assist you.

Sincerely,

Thomas E. Luebke, FAIA
Secretary

Steve Whitesell, Regional Director
National Park Service, National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

cc: Hallie Boyce, OLIN
Rich Bradley, Downtown Business Improvement District
Peter May, National Park Service

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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering wise use of our land and water resources, protecting our fish and wildlife, preserving the environmental and cultural values of our national parks and historic places, and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people. The department also promotes the goals of the Take Pride in America campaign by encouraging stewardship and citizen responsibility for the public lands and promoting citizen participation in their care. The department also has major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

NPS November 2014