

Banneker Park
National Mall and Memorial Parks
Washington, DC

U.S. Department of the Interior
National Park Service

Section 106

Assessment of Effects Report

Benjamin Banneker Park Connection

March 2016



**National
Capital
Planning
Commission**



THE WHARF



PROJECT SUMMARY

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 Hoffman-Madison Waterfront, is proposing to construct a temporary connection at Benjamin Banneker Park (Banneker Park) that includes a stairway and Architecture Barriers Act Accessibility Standard (ABAAS)-compliant ramp to provide universal accessibility between Tenth Street, SW, and Maine Avenue, SW, along the southwest waterfront.

Since Banneker Park is part of the National Mall and Memorial Parks, and the NPS is the lead federal agency, this project is a federal undertaking that is subject to Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). NCPC will review the project under its authorities in the National Capital Planning Act of 1952 (NCPA), and an approval action by NCPC is also an undertaking. NCPC has designated NPS as the lead agency to satisfy the Commission's Section 106 responsibility. NPS initiated consultation with the DC State Historic Preservation Office (DC SHPO) in June, 2015. At this time NPS, in coordination with NCPC, identified a list of consulting parties and a preliminary Area of Potential Effect (APE). The identified organizations represent national and local interests in preservation and development, particularly those concerned with the southwest waterfront and the National Mall and Memorial Parks. Tribal consultation was initiated through the initial scoping meeting notification sent on July 20, 2015. The preliminary APE, presented at the initial Agency Scoping Meeting on August 20, 2015, was refined in consultation with DC SHPO, NCPC, NPS, and the Commission of Fine Arts (CFA). Its boundaries currently stand at the East Potomac Park to the southwest, Fourteenth Street Bridge, up the train tracks to the Twelfth Street Expressway, Independence Avenue, Ninth, D, and Seventh Streets, SW. The boundaries include the East and West Potomac Parks Historic District, as well as a number of listed resources or resources determined eligible for listing in the DC Inventory of Historic Sites (DC Inventory) and/or the National Register of Historic Places (NRHP).

Concurrently, with the Section 106 consultation process, the NPS is preparing an Environmental Assessment (EA) to analyze the environmental impacts of the project under the National Environmental Policy Act (NEPA). Two action alternatives and one no-action alternative have been identified and are analyzed in the EA. The NPS has hosted a series of meetings to discuss the alternatives, including a public open house on August 11, 2015, a joint NEPA/Section 106 agency initiation meeting on August 20, 2015, an additional pin-up design session to discuss alternatives on October 5, 2015, and a Section 106 consulting parties meeting on November 12, 2015. Summaries of the meetings have been included in **Appendix A**.

This Assessment of Effects Report (AOE) analyzes the three developed alternatives and provides the following documentation required by 36 CFR 800.11(e):

- Description of the Undertaking;
- Description of the project and each alternative;
- Description of the APE and identification of historic properties;
- Assessment of effects on historic properties from each alternative; and
- Copies and summaries of views provided by consulting parties and the public.

Based on the analysis presented in this report, and in consultation with DC SHPO, CFA, and other consulting parties, NPS and NCPC have determined that the project will have no adverse effect on historic properties, conditional to the further design review of landscape details to include: stormwater management, material selection, location of trees, lighting design, and design of wayfinding signs.

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APPENDIX A: MEETING SUMMARIES

All photographs were taken by EHT Tracerics in 2015 unless otherwise cited.

ACRONYMS AND ABBREVIATIONS

ABA	Architectural Barriers Act
ABAAS	Architectural Barriers Act Accessibility Standards
AOE	Assessment of Effects Report
APE	Area of Potential Effect
Banneker Park	Benjamin Banneker Park
CFA	Commission of Fine Arts
CFR	Code of Federal Regulations
DC SHPO	District of Columbia State Historic Preservation Office
DC Inventory	District of Columbia Inventory of Historic Sites
DOEE	District Department of Energy and Environment
DDOT	District Department of Transportation
EA	Environmental Assessment
HUD	Department of Housing and Urban Development
NAMA	National Mall and Memorial Parks
NCPA	National Capital Planning Act of 1952
NCPC	National Capital Planning Commission
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NPS	National Park Service
NRHP	National Register of Historic Places
WPA	Works Progress Administration

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DESCRIPTION OF THE UNDERTAKING

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 Hoffman-Madison Waterfront, is proposing to construct a temporary connection at Benjamin Banneker Park (Banneker Park) that includes a stairway and Architectural Barriers Act Accessibility Standard (ABAAS)-compliant ramp to provide universal accessibility between Tenth Street, SW, and Maine Avenue, SW, along the southwest waterfront. This project is considered temporary because anticipated redevelopment along Tenth Street, SW, as envisioned in the SW Ecodistrict Plan, may necessitate a permanent connection at this location in the future. Also, Banneker Park is listed as a “prime” site in the Memorials and Museums Master Plan (NCPC 2011) and could therefore be the site for a future museum or commemorative work.

Since Banneker Park is part of the National Mall and Memorial Parks (NAMA), and the NPS is the lead federal agency, this project is a federal undertaking that is subject to Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA). NCPC will review the project under its authorities in the National Capital Planning Act of 1952 (NCPA), and an approval action by NCPC is also an undertaking. NCPC has designated NPS as the lead agency to satisfy the Commission’s Section 106 responsibility.

PURPOSE OF AND NEED FOR THE ACTION

The purpose of the project is to provide a safe, functional, and aesthetically pleasing temporary connection to improve connectivity and access between Tenth Street, SW, and the southwest waterfront.

This project is needed because currently there is limited pedestrian and bicycle access between the waterfront, the L’Enfant Promenade, the National Mall, and surrounding areas. Improved pedestrian and bicycle access between the National Mall and the waterfront has been envisioned since the development of the National Mall Plan in 2010. This plan, prepared by NPS, recognized that improved connections are needed for pedestrian and bicyclists between the National Mall, surrounding city and transportation networks, and the waterfront (NPS 2010). More recently, in 2013, NCPC accepted the SW Ecodistrict Plan in an effort to create a sustainable and more livable urban environment within southwest DC (NCPC 2013). As part of the SW Ecodistrict planning process, the SW Ecodistrict Task Force, led by NCPC, developed design concepts for the Tenth Street, SW and Interim Banneker Connection (NCPC 2015). Improved pedestrian and bicycle access as described in the SW Ecodistrict Plan, the Programmatic Design Concept Summary for the Tenth Street, SW and Interim Banneker Connection, and the National Mall Plan, affirms the need for a connection between the waterfront and the National Mall at Banneker Park.

Summary of Section 106 Consultation

Following the implementing regulations of the NHPA, 36 CFR § 800, NPS initiated consultation with the DC State Historic Preservation Office (DC SHPO) in June, 2015. The NPS has hosted a series of meetings to discuss the alternatives including a public open house on August 11, 2015, a joint National Environmental Policy Act (NEPA)/Section 106 agency initiation meeting on August 20, 2015, an additional pin-up design session to discuss alternatives on October 5, 2015, and a Section 106 consulting parties meeting on November 12, 2015. Summaries of the meetings have been included in **Appendix A**.

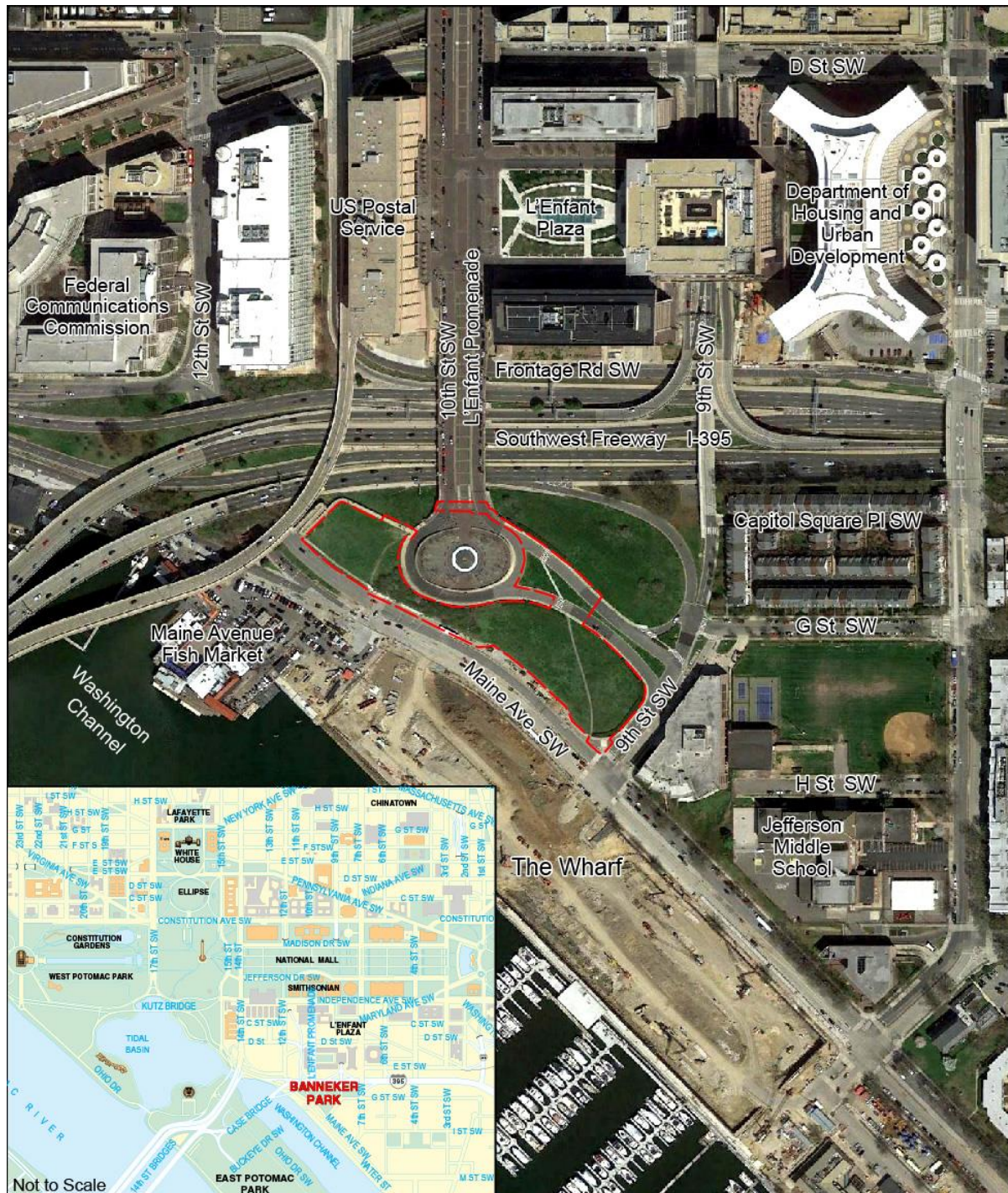


Figure 1: Banneker Park and Project Area for the Proposed Connection

Banneker Park Pedestrian Access Improvements
National Mall and Memorial Parks
Washington, DC

Legend: Project Area

 0 200 400 800 Feet



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IDENTIFICATION OF HISTORIC RESOURCES

DELINEATION OF AREA OF POTENTIAL EFFECT

Upon initiation of Section 106 consultation, NPS and NCPC identified a preliminary Area of Potential Effect (APE), which was refined in consultation with DC SHPO, US Commission of Fine Arts (CFA), and other consulting parties. The APE encompasses a geographic area where potential direct (physical) and indirect (visual) effects on historic properties may occur as a result of the project.

The APE for this project was delineated to include views and viewsheds to and from Banneker Park to the surrounding area. The boundaries reflect the outer limits from which views towards the property may reasonably generate indirect, visual effects, particularly along major streets and vistas. The APE, shown in Figure 2 on the following page, is currently bounded by East Potomac Park, Fourteenth Street Bridge, Maryland Avenue, SW, Twelfth Street Expressway, Independence Avenue, SW, and Ninth, D, and Seventh Streets, SW.

HISTORIC PROPERTIES LOCATED WITHIN THE AREA OF POTENTIAL EFFECT

Section 106 regulations define a historic property as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). The identification of resources within the APE was conducted through review of existing documentation, on-site survey, and consultation with DC SHPO. The project area, shown in **Figure 1**, is located at the southern terminus of the National Mall and Memorial Parks, an area that has been well documented. The boundaries of the APE include the East and West Potomac Parks Historic District and the Department of Housing and Urban Development, both of which are listed in the NRHP and the DC Inventory. Also within the APE are a number of resources that have previously been determined eligible for listing in both the DC Inventory and the NRHP. These resources are Benjamin Banneker Park itself; the Lunch Room and Oyster Shucking Shed, which is part of the former Municipal Fish Market; Washington Marina; Jefferson Middle School; and L'Enfant Promenade (Tenth Street, SW). All of the resources and their designations are listed in **Table 1** below and their locations within the APE are provided in **Figure 2**.

Table 1: Listed and Eligible Resources within the APE

Property	Designation	Property	Designation
Benjamin Banneker Park	Eligible DC/NRHP	Washington Marina	Eligible DC/NRHP
East/West Potomac Park HD	Listed DC/NRHP	Jefferson Middle School	Eligible DC/NRHP
Department of Housing and Urban Development	Listed DC/NRHP	L'Enfant Promenade	Eligible DC/NRHP
Lunch Room/Oyster Shucking Shed	Listed DC/NRHP		



Benjamin Banneker Park

Date: 1967-1969

Architect: Dan Kiley

Designation: Determined Eligible for Listing in the NRHP and DC Inventory in 2012

Benjamin Banneker Park, originally known as the Tenth Street Overlook, is located within the National Mall and Memorial Parks at the southern terminus of L'Enfant Promenade, connecting the National Mall to the southwest waterfront. The area was initially part of the National Capital Planning Commission's *1950 Comprehensive Plan for the District of Columbia*, which addressed the blight of southwest DC.

Southwest, which had developed as a free African-American community prior to the Civil War, continued to grow after the Civil War; however, the area lacked the infrastructure and funding to create safe and livable housing. NCPC's plan outlined two, later expanded to three, areas to be redeveloped. In 1953, the redevelopment of Area C, in which Banneker Park falls, was awarded to New York developers Webb & Knapp, whose in-house architects at the time were I.M. Pei and Harry Weese. Area C had four key elements, including the Tenth Street promenade that terminated at Maine Avenue, SW, in a loosely designed, semi-circular pool surrounded by restaurants, shopping, and other commercial interests (DC SHPO 2012b). While Pei and Weese fully designed the Tenth Street Mall, now known as L'Enfant Promenade, the actual design of Banneker Park was executed by renowned landscape architect Dan Kiley.



Image 1: Banneker Park, looking south.

Designed and constructed as the Tenth Street Overlook between 1967 and 1969, Banneker Park was built on top of fill moved from the construction of the Southwest Freeway. The sloping lawns were planted with 726 dogwoods laid out in a specified grid; however, only approximately ten original dogwoods remain today. The dogwoods were in turn surrounded by Japanese yews. The sloping lawns rose to the 200-foot-wide central plaza that was designed to offer views of Washington Channel and the Potomac River beyond. The plaza incorporates a large, elliptical fountain ringed by London plane trees, paths, lighting, benches, trash receptacles, and contemporary interpretative signage. A number of these elements are visible in **Image 1** above. Tenth Street, SW, circles the central plaza and cuts to the east to connect L'Enfant Promenade to Ninth Street, SW. The Tenth Street Overlook was renamed Benjamin Banneker Park in 1971 by the NPS, though the area has no specific connection to Banneker himself, who was a largely self-taught, former slave, who made important contributions to astronomy, agriculture, surveying, and racial equality (NPS 2013).

In 2012, Banneker Park was determined eligible for listing in both the DC Inventory and the NRHP for its design by significant landscape architect Dan Kiley. Contributing elements of the

park include the walls of the park, topography, fountain, paths, benches, lighting, trash receptacles, riprap embankment, London plane trees, Japanese yews, and the remaining dogwoods. The viewsheds from the central plaza, looking up L'Enfant Promenade and southwest, south, and southeast towards the Washington Channel and Potomac River are also contributing elements. The vegetation planted on top of the riprap embankment to the south of the park, the road and sidewalks, and interpretative signage are all considered non-contributing elements to the park (NPS 2013).

East and West Potomac Parks Historic District

Date: 1882-1916

Designation: Listed in the DC Inventory (November 8, 1964) and NRHP (November 30, 1973; revised November 11, 2001)

Created by the United States Army Corps of Engineers, East and West Potomac Parks comprise a large portion of the monumental core of Washington, DC. The parks are located on the Potomac River, stretching from Constitution Avenue, NW, to Hains Point, shown in **Image 2**. The parks were created as part of the McMillan Commission Plan, one of the nation's greatest contributions from the City Beautiful Movement. The parks were part of reclamation project executed by the Army Corps of Engineers to improve the navigation and sanitation of the Potomac River and Potomac Flats. Dredge from the river was molded to form both parks, surrounding the newly



Image 2: View of East Potomac Park, looking southeast from Banneker Park.

formed Tidal Basin, completing the monumental core of the Nation's Capital. The project took approximately thirty years to complete, ending with the construction of Ohio Drive in 1916, which follows the perimeter of the park. Once completed, over 730 acres of new land were opened for public recreational use. The parks today include baseball fields, soccer fields, tennis courts, a golf course, and NPS office buildings, as well as the Thomas Jefferson Memorial, Franklin Delano Roosevelt Memorial, and the Martin Luther King, Jr., Memorial. Both parks comprise a historic district that is significant for its relation to the monumental core of the city. The historic district is listed in both the DC Inventory and the NRHP (DC SHPO 2009).

Department of Housing and Urban Development

Date: 1965-1968

Architect: Marcel Breuer

Designation: Listed in the DC Inventory (June 28, 2008) and NRHP (August 28, 2008)

The Department of Housing and Urban Development (HUD), also known as the Robert C. Weaver Federal Building, is located at 451 Seventh Street, SW. Designed by world-renowned, Hungarian architect Marcel Breuer, the building was the first structure to be designed and constructed under the Guiding Principles for Federal Architecture. Written in 1962 by Senator

Daniel Patrick Moynihan, the Guiding Principles emphasized the importance and influence of federal government architecture. Breuer was also the first to use precast and cast-in-place concrete as the structural and finish material of a government building. The ten-story, sweeping, curvilinear X-shaped building was executed in the Expressionist style. The plaza along Seventh Street, SW, was executed by landscape architect Martha Schwartz in 1990, seen in **Image 3** (DC SHPO 2009).



Image 3: Department of Housing and Urban Development Building, looking northwest along Seventh Street, SW.

In 1999, the building was renamed for Robert C. Weaver, the Secretary of Housing and Urban Development under Lyndon Johnson's administration between 1966 and 1968, and the first African-American Cabinet member. The building is listed in both the DC Inventory and NRHP and is significant for its innovative Expressionist design by Marcel Breuer and his use of precast and cast-in-place concrete for both structure and finish (DC SHPO 2009).

Lunch Room and Oyster Shucking Shed

Date: 1916-1918

Architect: Snowden Ashford

Designation: Listed in the DC Inventory (November 19, 2015); Determined Eligible for NRHP

Constructed as part of the larger Municipal Fish Market complex in southwest, DC, the Lunch Room and Oyster Shucking Shed are the last two remaining buildings. Located at the convergence of the Potomac and Anacostia Rivers, Washington, DC, has long been the center of fish trade in the region. Since the early nineteenth century, the operations have been located along the southwest waterfront. During the Civil War, the wharves were commandeered by the military and then returned to their original owners after. Towards the end of the nineteenth century, the area was severely rundown, lacking infrastructure and stability. The government took possession of the southwest waterfront again in the U.S. Supreme Court Potomac Flats case. With control of the area after the formation of the Washington Channel and construction of the East and West Potomac Parks, the city began construction of a large Municipal Fish Market. Designed by Municipal Architect Snowden Ashford, the Municipal Fish Market was constructed between 1916 and 1918. The complex was composed of seven separate buildings, of which the Lunch



Image 4: Lunch Room and Oyster Shucking Shed, looking northwest.

Room and Oyster Shucking Shed are the only two remaining. The buildings have been altered over time, as evident in **Image 4** on the previous page, but were listed in the DC Inventory on November 19, 2015, and were forwarded to the NRHP for listing (DC SHPO 2012a).

Washington Marina

Date: 1938

Architect: Part of the Works Progress Administration

Designation: Determined Eligible for Listing in the NRHP and DC Inventory in 2012

The Washington Marina, located at 1300 Maine Avenue, SW, and pictured in **Image 5** below, was designed and constructed as part of a larger Works Progress Administration (WPA) project. Over the course of eight years, the WPA and the Army Corps of Engineers improved the Washington Channel, created by the East and West Potomac Parks. The project included the construction of multiple yacht basins, small boat anchorages, and six new wharves (DC SHPO 2009). The Washington Marina building was the first to be constructed in 1938 adjacent to Yacht Basin No. 1, at the northern end of the Washington Channel. The building was originally used as a yacht sales office; currently, it houses the offices of the marina. The building was determined eligible for listing in the NRHP and DC Inventory in 2012 for its association with the WPA and its relationship with DC's waterfront (DC SHPO 2012a).



Image 5: Washington Marina, looking southwest.

Jefferson Middle School

Date: 1939-1940

Architect: Nathan C. Wyeth

Designation: Determined Eligible for Listing in the NRHP and DC Inventory in 2012

Constructed between 1939 and 1940, Jefferson Middle School was designed by then Municipal Architect Nathan C. Wyeth. The school replaced another Jefferson School located at Sixth and D Streets, SW, that had been designed by Adolf Cluss in 1872. The new school was constructed at G and Seventh Streets, SW. Wyeth, who was classically trained at the Ecole des Beaux Arts in Paris, France, used his skill to elegantly design Jefferson Middle School with excellent proportion, massing, and



Image 6: Jefferson Middle School, looking south.

siting in the Colonial Revival style, as evident in **Image 6** on the previous page. The school was determined eligible for listing in both the NRHP and the DC Inventory in 2012, and is identified in the National Register Multiple Property Listing for DC Public Schools (DC SHPO 2012a).

L'Enfant Promenade

Date: 1965-1968

Architect: I.M. Pei and Harry Weese

Designation: Determined Eligible for Listing in the DC Inventory and NRHP in 2014

Originally referred to as the Tenth Street Mall, is located within the National Mall and Memorial Parks between the National Mall and the southwest waterfront. The area was part of the National Capital Planning Commission's *1950 Comprehensive Plan for the District of Columbia*, which addressed the blight of southwest DC. Southwest, which had developed as a free African-American community prior to the Civil War, continued to grow after the Civil War; however, the area lacked the infrastructure and funding to create safe and livable housing. NCPC's plan outlined two, later expanded to three, areas to be redeveloped. In 1953, the redevelopment of Area C was awarded to New York developers Webb & Knapp, whose in-house architects at the time were I.M. Pei and Harry Weese. Their vision for Area C had four key elements: the Tenth Street Mall, the Plaza, the waterfront, and the residential neighborhood (DC SHPO 2012a).



Image 7: Southern terminus of L'Enfant Promenade, looking north.

Pei and Weese collaborated on the large promenade that was designed to connect the National Mall to the waterfront. First imagined as a cultural mall, the promenade developed into a large plaza with government buildings flanking either side with strips of landscaping. Wide sidewalks run adjacent to the four-lane roadway with a wide, central divider, seen in **Image 7** above; all of these elements are considered contributing to the resource, as well as the viewsheds, materials, light fixtures, and orientation. L'Enfant Promenade was determined eligible for listing in both the NRH and the DC Inventory in 2014 for its association with the National Mall and the southwest waterfront, and its design executed by Pei and Weese (DC SHPO 2012a).

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EXISTING CONDITIONS

DESCRIPTION OF SITE

Banneker Park is under the jurisdiction of the NPS/NAMA and is located in southwest Washington, DC. The park is generally bounded by Maine Avenue, SW, to the south, the Southwest Freeway (I-395) to the north and west, and Ninth Street, SW, to the east. Banneker Park comprises the southern terminus of the L'Enfant Promenade, approximately one-half-mile south of the National Mall. The overlook at Banneker Park includes an approximately 200-foot wide elliptical plaza that contains a granite water fountain surrounded by asphalt block paths, granite pavers, London plane trees, and provides benches, trash receptacles, and interpretive signage. From the overlook, visitors are afforded views primarily of the Washington Channel and East Potomac Park. The rest of Banneker Park is comprised of grass fields that slope steeply down to Maine Avenue, SW. Approximately ten of the original 726 dogwood trees planted on the lawns are still surviving, limited to the northeast section of the park. The southern slope of the park consists of an approximately 250-foot riprap embankment. Bush honeysuckle, staghorn sumac, and other vegetation has established along the embankment. The roadways and sidewalks within the limits of Banneker Park are owned by the District and maintained by the District Department of Transportation (DDOT). All remaining facilities, including the overlook and lawn, are property of the NPS.

Traffic circulation is provided by roadways in and around the Park. Tenth Street, SW, provides one-way vehicle access around the overlook, and access is also provided to motorists from Ninth Street, SW, and via Exit 4 off of I-395. Japanese yew, an evergreen shrub, is planted along portions of the roadways. On the west side of the overlook, a pedestrian/bicycle ramp connects to the sidewalk of the Francis Case Memorial Bridge, which provides access across the Washington Channel. An approximately four feet wide paved pathway connects the sidewalks along Tenth Street, SW, to the Maine Avenue and Ninth Street, SW, intersection across the eastern hillslope of Banneker Park (see photo below on right). This path is not ABAAS-compliant. Additionally, heavy pedestrian traffic has created a social trail on the western hillslope of Banneker Park from the overlook to the sidewalk along Maine Avenue, SW. The social trail has been created by pedestrians looking for a direct route from Tenth Street, SW, to the Fish Market and other areas along the waterfront. The sidewalk along Maine Avenue, SW, is four-feet wide and is impeded by utility poles. A pedestrian crosswalk has been constructed on Maine Avenue, SW, as part of the initial phase of the Wharf development that includes a lighted intersection near the Fish Market along Maine Avenue, SW.



Image 8: Sloping lawn of the northeast section of Banneker Park, looking east; note two of the remaining dogwoods in the background.

CHARACTER DEFINING FEATURES

Topography/Slope/Lawn

The open space of the lawn, pictured in **Image 8** on the previous page, is a non-contributing feature of the park as it was intended to be covered by dogwoods; however, the material of the lawn and its topography and slope, all remain intact and are contributing elements to Banneker Park. Neither the social trail on the western hillslope, the paved pathway on the eastern hillslope, nor the walkway from the pedestrian/bicycle ramp to the Case Memorial Bridge, are contributing elements to the park as all three were added at later dates.

Dogwoods/Japanese Yew/London Plane Trees

The remaining ten original dogwoods, some of which can be seen in **Image 8**, are all located in the northeast section of the park and are contributing elements. The remaining original Japanese yew bushes, located along Tenth Street, SW, leading to Ninth Street, SW, and along the southeast corner of the park, shown in **Image 9**, are contributing elements to the park even though they were originally designed to ring the entire lawn. The London plane trees, while they may not be the actual trees planted between 1967 and 1969, are the original species, in the original locations circling the fountain, and are considered contributing elements.



Image 9: Some of the Japanese yews located at the intersection of Ninth Street and Maine Avenue, SW, looking northwest.

Walls

The inner and outer poured concrete walls of Banneker Park are contributing elements, pictured in **Images 10 and 11** on this page, and **Images 12 and 13** on page 16. Both are in fair condition; however, an opening was previously created in the outer, western wall to provide access to the path leading to the pedestrian/bicycle ramp to the sidewalk on the Case Memorial Bridge, which is not a contributing element, seen in **Image 10** below.



Image 10: Both the inner and outer walls pictured here, looking east, are contributing elements to the park. The opening in the wall to the left is a previous alteration to the historic fabric.



Image 11: Both the inner and outer walls of the park, looking east; both are contributing elements.

Riprap Embankment

The riprap embankment is listed as a contributing element to the park; however, the vegetation growing within the riprap is considered non-contributing. The original design called for a more robust erosion control system consisting of a heavily planted riprap embankment of rock spray cotoneaster with a flowering dogwood canopy cover; the vegetation was intended to fully cover the riprap.

Fountain

The large central fountain forms the focal point of the park. Constructed of four sections of conical granite, the fountain slopes outward, carrying the water that shoots up from the center to the pool beneath. The fountain, including the granite surrounding the pool, is a contributing element of Banneker Park. The fountain and its surrounding granite are in good condition.

Lighting/Trash Receptacles/Benches/Circular Path

The light posts, trash receptacles, benches, granite pavers around the London plane trees, and asphalt block paths inside the circular plaza at Banneker Park were all elements designed by Kiley and are contributing to the park, shown in **Images 13, 14, and 15** on the following page. Some of the trash receptacles are in poor condition and some of the granite pavers around the London plane trees are missing, otherwise the elements are in fair to good condition. The interpretative signage was added after the 1970s and was not part of Kiley's design. Therefore, they are non-contributing elements.

Viewsheds

There are four character defining views and vistas from Banneker Park:

1. From Banneker Park looking north through L'Enfant Promenade to the National Mall;
2. View from Banneker Park looking south towards the Potomac River;
3. View from Banneker Park looking southwest towards the Tidal Basin and the Jefferson Memorial; and
4. View from Banneker Park looking southeast through the waterfront in the foreground, Washington Channel in the middle ground, and the East Potomac Park (Hains Point) in the background.

INTEGRITY

Banneker Park continues to convey its identity as a historic resource and cultural landscape. The significant landscape characteristics include spatial organization, land use, topography, circulation, vegetation, buildings and structures, constructed water features, views and vistas, and small scale features. The physical integrity of the Banneker Park cultural landscape is evaluated by comparing landscape characteristics and features present during the period of significance (1967-1969) with current conditions. Most of the landscape's historic characteristics and features are still intact.

Since the original construction, some landscape characteristics and features that reflected the period of significance have been removed or are damaged. These features include vegetation and small scale features. Although reversible, much of the original planted vegetation is gone, which changes the intended vegetative character of the park. In addition, the majority of the small scale features remain, but many of them are damaged or non-functioning. Some changes in circulation have occurred as well, including the addition of paved pathways and an informal path that were not part of the original design. Despite these modifications the Banneker Park cultural landscape retains overall integrity of location, design, setting, association, workmanship, materials and feeling, all seven of the aspects of integrity that the National Register deems essential to communicate a historic resources sense of time and place.



Image 12 (Top Left): Looking west from the median between Tenth Street, at the outside of the inner wall of Banneker Park. **Image 13 (Top Right):** Taken from the north side of the park, looking east, showing some of the contemporary interpretative signage and the contributing inner wall. **Image 14 (Bottom Left):** View of the interior plaza of the park, looking southwest, this image shows more interpretive signage, along with the contributing London plane trees, light posts, trash receptacles and path materials, including the granite pavers and asphalt block paths. **Image 15 (Bottom Right):** View of the fountain, looking west, ringed by contributing benches and London plane trees.

ALTERNATIVES

ALTERNATIVE A: NO-ACTION

Under Alternative A, some minor modifications to pedestrian facilities at the Maine Avenue and Ninth Street, SW, intersection would be conducted as part of roadway improvements associated with the Wharf development. Otherwise, pedestrians and bicyclists would continue to use existing pathways at Banneker Park in their existing condition. The existing 4-foot wide paved pathway across the eastern hillslope of the park would remain in place. Also, pedestrians would continue to use the social trail on the western hillslope of the park to access Maine Avenue, SW, from Tenth Street, SW. Bicyclists accessing the pedestrian/bicycle ramp to Case Memorial Bridge from surrounding areas would continue to have to hop up onto the existing curb from the traffic circle. Similarly, bicyclists entering Banneker Park from the Case Memorial Bridge pedestrian/bicycle ramp would be required to hop down off of the existing sidewalk and into the driving lane of the traffic circle to access Tenth Street, SW, or the existing paved pathway to the Maine Avenue and Ninth Street, SW, intersection.

Pedestrian facilities at Banneker Park would remain noncompliant with ABA-accessibility standards. Curbs would remain in place at pedestrian crossings surrounding the park's central plaza. The NPS would consider minimal improvements, such as installing curb ramps at existing pedestrian crosswalks to improve bicycle accessibility, but no other improvements would be completed. In the future, a permanent connection would be constructed for pedestrians and bicyclists at Banneker Park as a part of the proposed Tenth Street, SW, improvements presented in the SW Ecodistrict Plan, or as part of a larger site design if a museum or commemorative work is constructed, as identified in the Memorials and Museums Master Plan.

Park landscaping and lighting would remain unchanged under Alternative A. The NPS would continue to maintain slopes of the park as turfgrass areas, and other vegetated areas would be maintained in the current condition. Lighting at the park, which is limited to the central plaza and surrounding roadways, would also be maintained in its existing condition.

ALTERNATIVE B (NPS AND NCPC PREFERRED ALTERNATIVE)

Under Alternative B, a temporary stairway would be constructed on the west side of Banneker Park. The stairway would begin at a proposed transition area where the path to the Case Memorial Bridge pedestrian/bicycle ramp connects to the west side of the overlook. The transition area would be an approximate width of 16 feet, and the existing opening in the retaining wall would be widened from approximately 8 feet to between 16 and 20 feet. The stairway would continue down the western hillslope of the park and would terminate along Maine Avenue, SW, at the Maine Avenue, SW, intersection near the Fish Market. The stairway would be constructed of concrete and would be a minimum 15 feet wide. A bike trough would be

incorporated into the stairway design to make access easier for bicyclists who prefer to walk their bikes up or down the stairs. In addition, a curb/bicycle ramp would be installed along the existing sidewalk at the opening in the overlook retaining wall to provide enhanced bicycle accessibility between the Case Memorial Bridge pedestrian/bicycle ramp, Ninth Street, SW, and Tenth Street, SW.

In addition, ABAAS-compliant paths would be constructed on the east side of the park to provide access for pedestrians, including persons with disabilities, and also for bicyclists, to the Maine Avenue, SW, intersection near the Fish Market, as well as the Maine Avenue and Ninth Street, SW, intersection. New sidewalks and pedestrian crosswalks, including curb ramps and striping, would be installed to provide access to the ABAAS-compliant paths at the Tenth Street, SW, intersection with Ninth Street, SW, where one path would continue down the eastern hillslope, terminating at the Maine Avenue and Ninth Street, SW, intersection. The second path would continue down the hillslope in a western direction, terminating along Maine Avenue, SW, at the intersection near the Fish Market. Furthermore, a new pedestrian crosswalk with curb ramps and striping would be constructed across the Tenth Street, SW, vehicle access ramp from Ninth Street, SW.

The proposed ABAAS-compliant paths would have a 2 percent maximum cross slope and 5 percent maximum longitudinal slope. The paths would include evenly spaced landings, so as not to require handrails. The paths would be a minimum width of 10 feet, and would be constructed using a light-colored asphalt material consistent with NPS standards. Along Maine Avenue, SW, the existing sidewalk, within the project's scope, would be widened from its existing 6-foot total width to a varying width of 12 to 20 feet in order to provide adequate pedestrian circulation, and accommodate landscaping, street furniture, lights, and signage. The widened sidewalk would accommodate an ABAAS-compliant pedestrian through zone, sufficient transition area where the stairway, paths, and sidewalk connect, and additional space that would be allocated to light posts and street trees. To accommodate these features, a concrete retaining wall would be constructed along the southern hillslope of Banneker Park. The retaining wall would replace a portion of the existing riprap embankment and vegetation, and would range from 42 inches up to 10 feet at its highest point. The retaining wall would be designed in coordination with the DC State Historic Preservation Office (SHPO) to be complimentary in form but distinct from the original Kiley design of Banneker Park.

Proposed improvements or modifications within the park to the overlook, retaining walls, and vegetated hillslopes would be conducted within NPS property under Alternative B. Improvements or modifications to sidewalks and pedestrian crosswalks along Tenth Street and Maine Avenue, SW, would occur within DDOT rights-of-way. Though not part of this project, DDOT plans to explore opportunities to enhance accessibility and safety for pedestrians and bicyclists on Tenth Street, SW, and around the traffic circle at Banneker Park, by incorporating a bicycle lane on the existing roadway, and/or by widening the existing sidewalk around the south and west sides of the traffic circle from 6 feet to as much as 10 feet.

Landscaping would also be included in the design of the project that may include reintroducing a limited section of the original grid pattern of trees originally intended by Kiley in the design of the park and installing street trees within the sidewalk area along Maine Avenue, SW. The NPS would select plant material, such as redbud (*Cercis canadensis*), to be sympathetic to Kiley's design of Banneker Park and that are hardier than the dogwoods that were originally planted at the site. The landscape plan would also include the removal of an approximately 40-foot section of Japanese yew at the Maine Avenue and Ninth Street, SW, intersection to accommodate the new ABAAS-compliant path. New, smaller Japanese yew would be planted along the edge of the south exit road from Tenth Street, SW, to Ninth Street, SW. The new Japanese yew would be maintained as a low hedge of 2 to 3 feet maximum height, and would serve to encourage the use of the formal pathways within the park, as well as to define the edge of the landscape improvements.

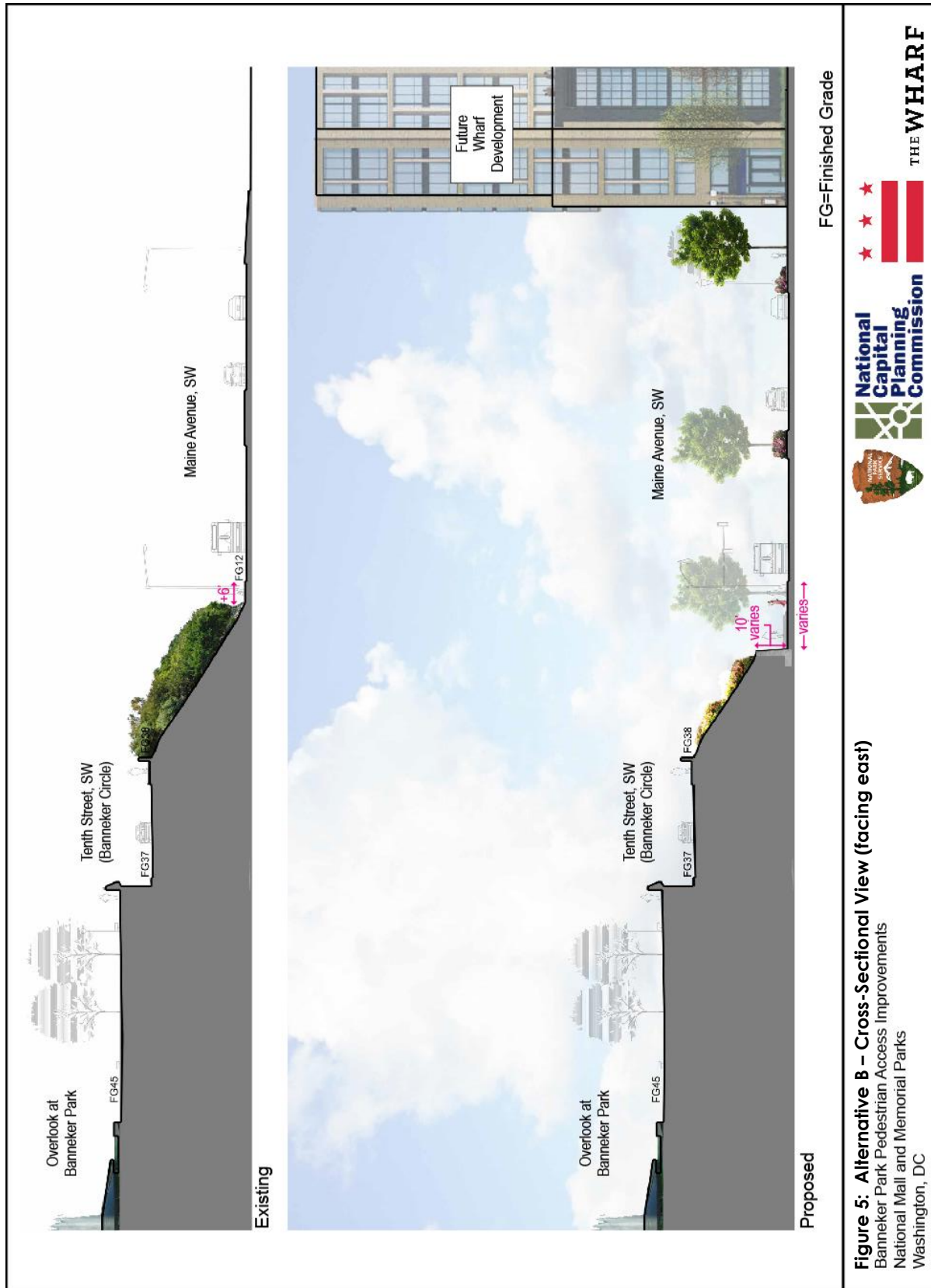
Additionally, lighting features that meet current national electric codes, or other NPS preferred lighting standards, would be installed along the new stairway and paths. Wayfinding signage would be installed at the site to direct pedestrians and bicyclists on Maine Avenue, SW to Tenth Street, SW, the National Mall, and East Potomac Park via the Case Memorial Bridge. Wayfinding signage would also be provided to direct pedestrians and bicyclists from the National Mall and Tenth Street, SW, to East Potomac Park, the waterfront, and the Anacostia Riverwalk Trail.

The proposed project would add approximately 12,750 square feet of impervious surface to the park under Alternative B. The NPS would implement stormwater management into the design of the connection, as required by the 2013 Rule on Stormwater Management and Soil Erosion and Sediment Control and the stormwater requirements for federal projects that are outlined in Section 438 of the 2007 Energy Independence and Security Act. The NPS is proposing the use of bioretention, including rain gardens and bioswales for stormwater management, which would be coordinated with the District Department of Energy and Environment (DOEE), to ensure that this technique is appropriate for collecting and treating stormwater at the site. In addition, the NPS would consider strategies and partnerships for long-term maintenance of stormwater retention facilities.

Figures 3, 4, and 5 provide a conceptual layout of the temporary stairway, ABAAS-compliant pathways for pedestrians and bicyclists, the proposed limits of work, and other design elements such as landscaping and stormwater management proposed under Alternative B.







ALTERNATIVE C

Under Alternative C, a temporary stairway would be constructed on the east side of Banneker Park. The stairway would be constructed of concrete and would be approximately 12 feet wide. A bike trough would be incorporated into the stairway design to make access easier for bicyclists who prefer to walk their bikes up or down the stairs. In addition, an ABAAS-compliant path would be constructed adjacent to the stairway for use by pedestrians, including persons with disabilities, and also by bicyclists. The stairway and path would begin to the east of the overlook at the Tenth Street, SW, exit ramp onto Ninth Street, SW. The stairway and path would continue down the eastern hillslope, terminating along Maine Avenue, SW, at the Maine Avenue, SW, intersection near the Fish Market. In order to provide ABA-accessibility to the stairway and path, new sidewalks would be installed on the east side of the overlook, and curb ramps and striping would be installed along Tenth Street, SW, and at existing crosswalks. In addition, a curb ramp would be installed along the existing sidewalk at the opening in the overlook retaining wall to provide enhanced bicycle accessibility between the Case Memorial Bridge pedestrian/bicycle ramp, Ninth Street, SW, and Tenth Street, SW. A new pedestrian crosswalk with curb ramps and striping would also be constructed across the Tenth Street, SW, access ramp from Ninth Street, SW.

The proposed ABAAS-compliant path would have a 2 percent maximum cross slope and 5 percent maximum longitudinal slope. The path would include evenly spaced landings, so as not to require handrails. The path would be a width of 10 feet, and would be constructed using a light-colored asphalt material consistent with NPS standards. Along Maine Avenue, SW, the existing sidewalk, within the project's scope, would be widened from its existing 6-foot total width to a varying width of 12 to 35 feet in order to provide adequate pedestrian circulation, and accommodate landscaping, street furniture, lights, and signage. The widened sidewalk would accommodate an ABAAS-compliant pedestrian through zone, sufficient transition area where the stairway, path, and sidewalk connect, and additional space allocated to light posts and street trees. To accommodate these features, a concrete retaining wall would be constructed along the southern hillslope of Banneker Park. The retaining wall would replace a portion of the existing riprap embankment and vegetation, and would range from 42 inches up to 16 feet at its highest point. The retaining wall would be designed in coordination with the DC SHPO to be complimentary in form but distinct from the original Kiley design of Banneker Park.

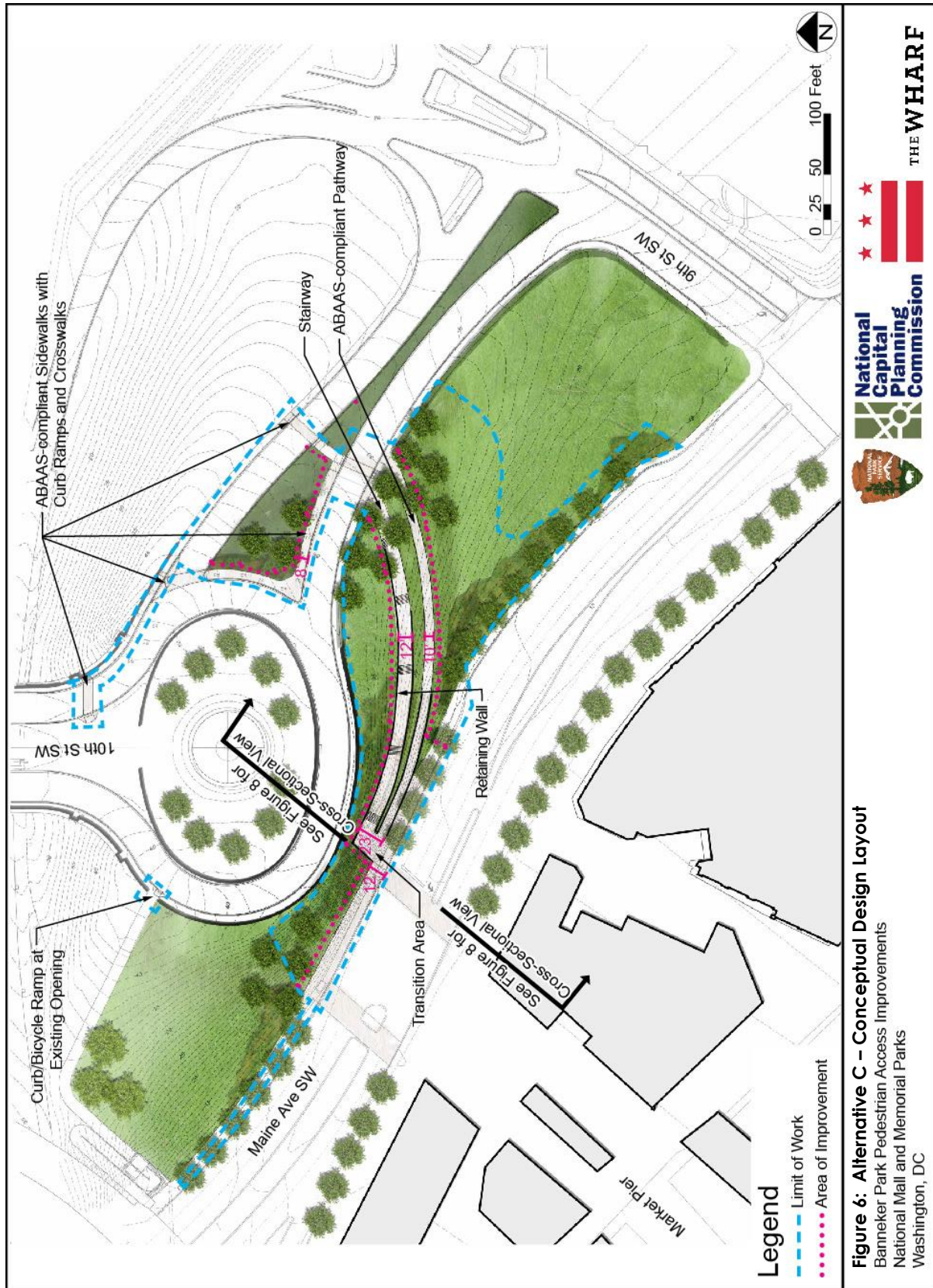
Proposed improvements or modifications within the park to the overlook, retaining walls, and vegetated hillslopes would be conducted within NPS property under Alternative C. Improvements or modifications to sidewalks and pedestrian crosswalks along Tenth Street and Maine Avenue, SW, would occur within DDOT rights-of-way. Though not part of this project, DDOT plans to explore opportunities to enhance accessibility and safety for pedestrians and bicyclists on Tenth Street, SW, and around the traffic circle at Banneker Park, by incorporating a bicycle lane on the existing roadway, and/or by widening the existing sidewalk around the south and west sides of the traffic circle from 6 feet to as much as 10 feet.

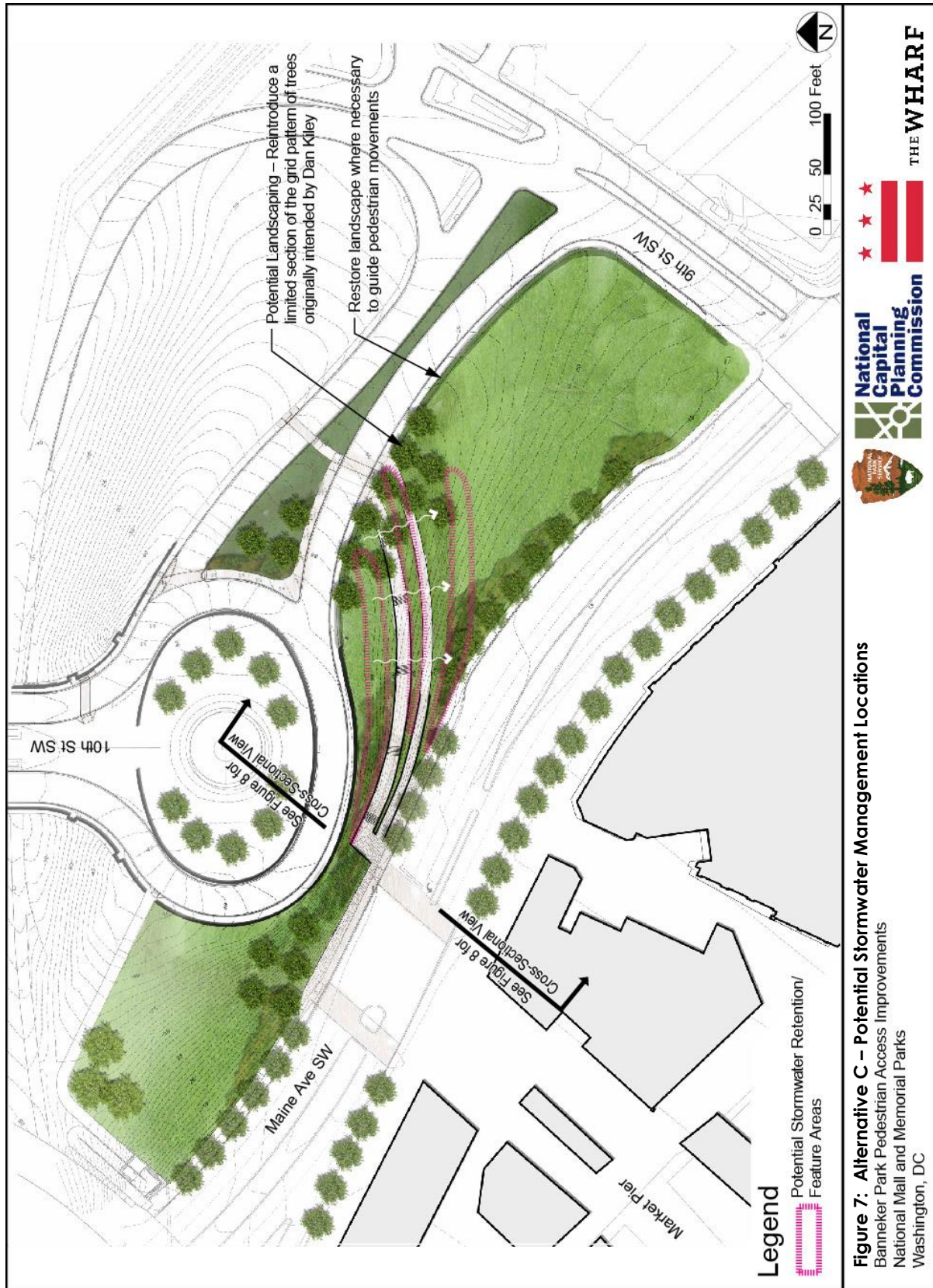
Landscaping would also be included in the design of the project that may include reintroducing a limited section of the original grid pattern of trees originally intended by Kiley in the design of the park and installing street trees within the sidewalk area along Maine Avenue, SW. The NPS would select plant material, such as redbud, to be sympathetic to Kiley's design of Banneker Park and that are hardier than the dogwoods that were originally planted at the site.

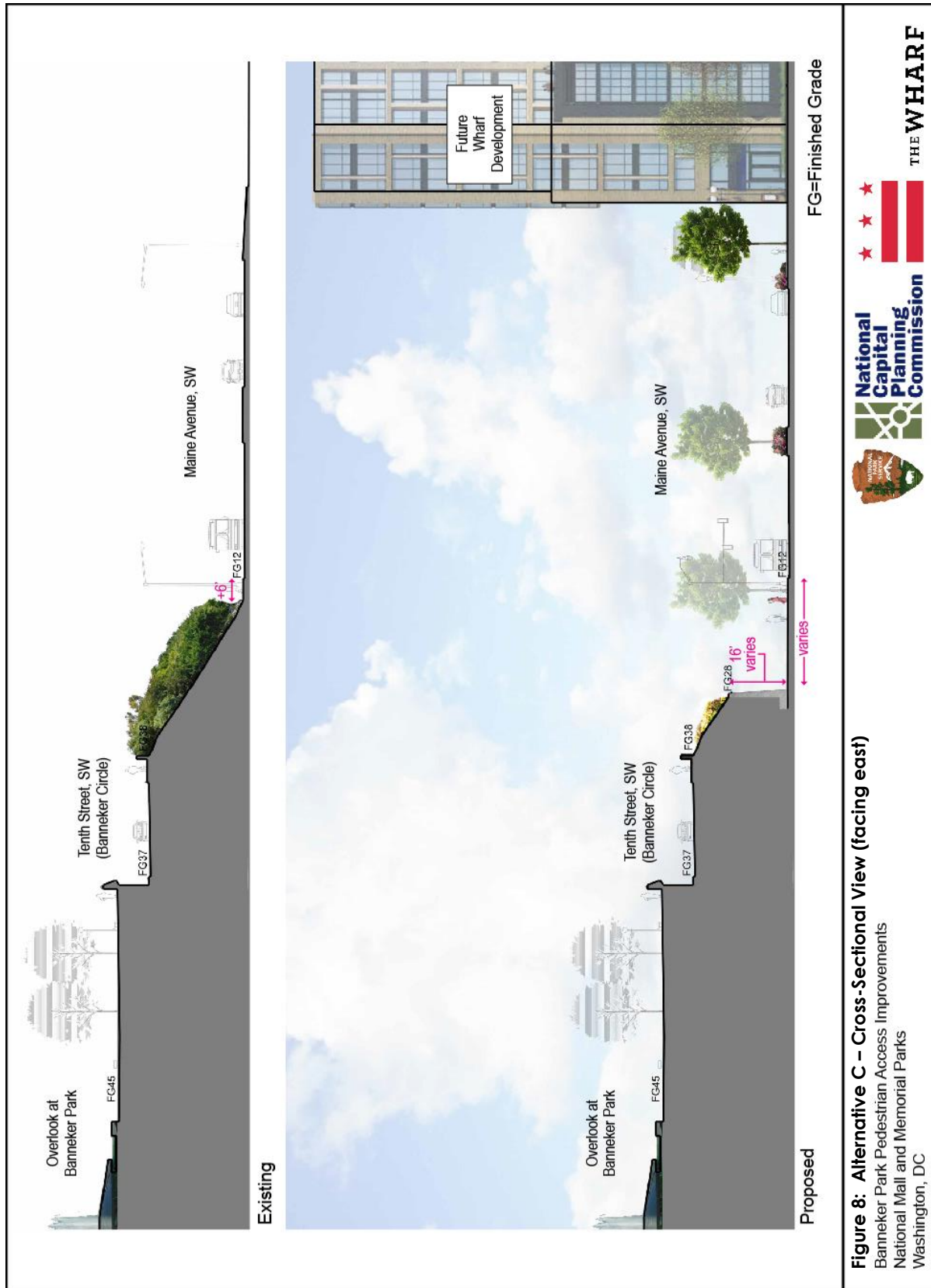
Additionally, lighting features would be installed along the new stairway and path. Lighting features that meet current national electric codes, or other NPS preferred lighting standards, would be installed along the new stairway and path, as well as along the new sidewalks on Maine Avenue, SW. Furthermore, the NPS would attempt to reestablish turf grass along the social trail on the west side of the overlook, and the existing paved path on the east side would also be removed. Wayfinding signage would be installed at the site to direct pedestrians and bicyclists on Maine Avenue, SW to Tenth Street, SW, the National Mall, and East Potomac Park via the Case Memorial Bridge. Wayfinding signage would also be provided to direct pedestrians and bicyclists from the National Mall and Tenth Street, SW, to East Potomac Park, the waterfront, and the Anacostia Riverwalk Trail.

The proposed project would add approximately 8,250 square feet of impervious surface to the park under Alternative C. The NPS would implement stormwater management into the design of the connection, as required by the 2013 Rule on Stormwater Management and Soil Erosion and Sediment Control and the stormwater requirements for federal projects that are outlined in Section 438 of the 2007 Energy Independence and Security Act. The NPS is proposing the use of bioretention, including rain gardens and bioswales for stormwater management, which would be coordinated with DOEE, to ensure that this technique is appropriate for collecting and treating stormwater on site. In addition, the NPS would consider strategies and partnerships for long-term maintenance of stormwater retention facilities.

Figures 6, 7, and 8 provide a conceptual layout of the temporary stairway, ABAAS-compliant pathways for pedestrians and bicyclists, the proposed limits of work, and other design elements such as landscaping and stormwater management proposed under Alternative C.







ALTERNATIVES DISMISSED FROM FURTHER CONSIDERATION

The NPS considered a wide range of alternatives for the location and layout of the proposed connection at Banneker Park that were ultimately dismissed from further consideration.

Planned Unit Development (PUD) Design

One alternative considered but dismissed included the design approved by the Zoning Commission as part of the Stage One Planned Unit Development (PUD) for the Southwest Waterfront redevelopment project, which consists of an angular stairway on the west side of the overlook (**Figure 9**). During the scoping process, this alternative was dismissed from further consideration by the agencies on the basis that the concept introduced an angular stairway into the curvilinear design of Banneker Park, which would not be sympathetic to the original Kiley design and would likely result in adverse effects to the historic property.

Stairway and Path on Western Hillslope

Another concept considered during planning was to include an ABAAS-compliant pedestrian path on the west side of Banneker Park between the proposed stairway and the Case Memorial Bridge pedestrian/bicycle ramp in lieu of an ABA-accessible path to the east (**Figure 10**). However, because of the steepness of the western hillslope of Banneker Park, several switchbacks and substantial cut and fill earthworks would be required. Also, sections of the path between the switchbacks would need to be over 400 feet long to meet the required 5 percent grade. This concept was dismissed from further consideration due to the substantial construction that would be required to make the path ABA-accessible.

Stairway and Ramp with Switchbacks

An additional concept evaluated during the planning process included a design for the pedestrian connection that included a stairway and ABAAS-compliant ramp located on the west side of Banneker Park. Due to the steepness of the western hillslope of Banneker Park, switchbacks with resting platforms would be needed for the stairway and ramp gradually elevate the user up to the overlook (**Figure 11**). Also, a large section of the retaining wall along the traffic circle would have to be removed to provide access to the stairway and ramp from the existing sidewalk. Due to the multiple switchbacks needed for ABAAS-compliance and the removal of the overlook wall, which contributes to the historical significance of Banneker Park, this concept was dismissed from further consideration during the planning process.

Office of Disability Rights Concept

Other alternative modifications were investigated as part of the planning process. A modified design of Alternative B was proposed, wherein a single path on the east side of Banneker Park would curve back towards the west in a manner sympathetic to Kiley's design, but would terminate mid-block on Maine Avenue, SW, between Ninth Street, SW, and the Maine Avenue, SW, intersection near the Fish Market (**Figure 12**). This modification was dismissed from further consideration because terminating the path mid-block would require that persons with disabilities travel a farther distance to access crosswalks, would promote jaywalking, and would

likely result in the establishment of social trails on the eastern hillslope of the park by pedestrians trying to reach the Maine Avenue and Ninth Street, SW, intersection.

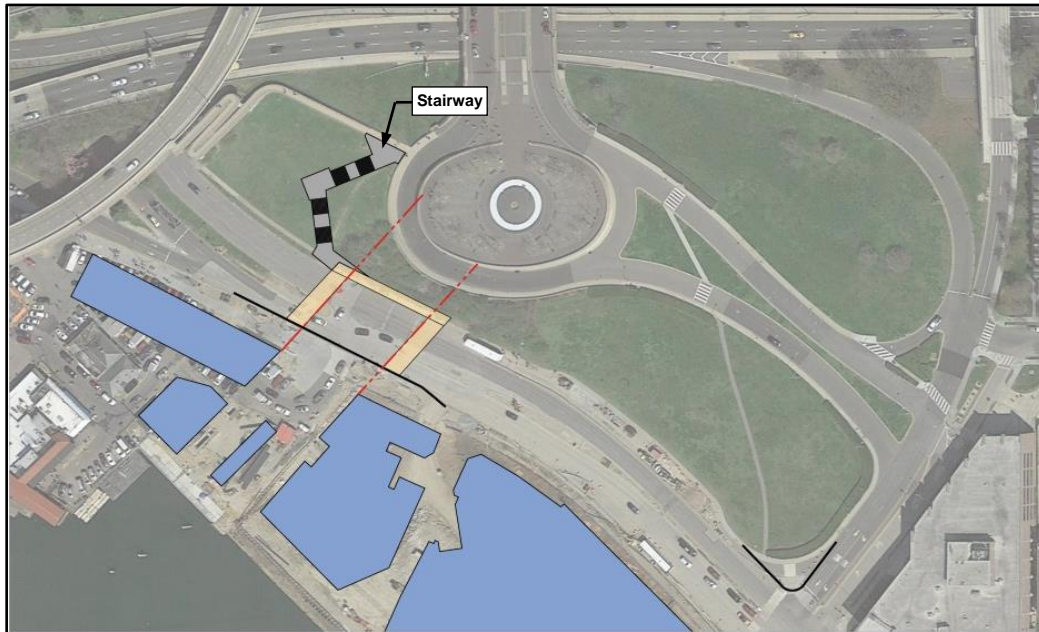


Figure 9: Dismissed Alternative: Approved PUD Design

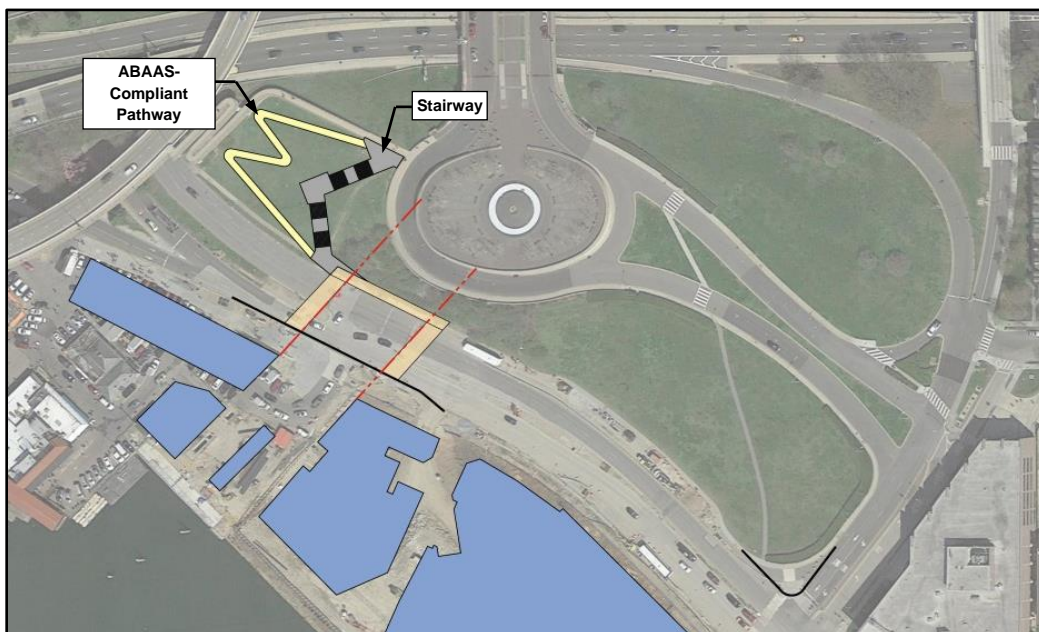


Figure 10: Dismissed Alternative: Stairway & Path on Western Hillslope

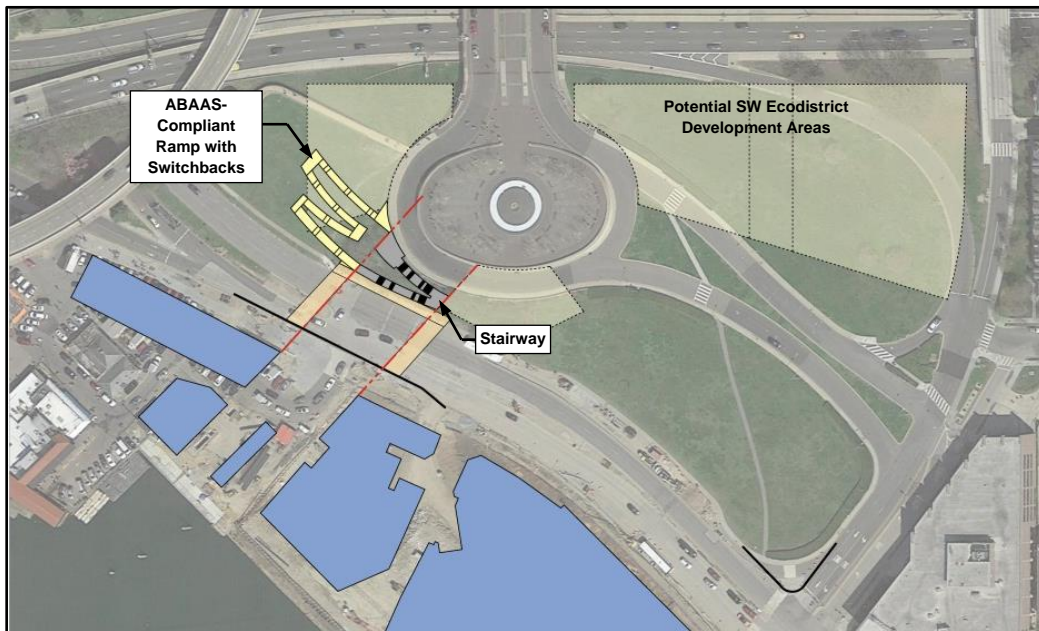


Figure 11: Dismissed Alternative: Stairway & Ramp with Switchbacks



Figure 12: Dismissed Alternative: Office of Disability Rights Concept

IDENTIFICATION OF EFFECTS

CRITERIA OF ADVERSE EFFECT

Effects assessments are based on the criteria of adverse effect as defined in the NHPA 36 CFR § 800.5. The criteria of adverse effect are defined as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative. [36 CFR 800.5(a)(1)]

Examples of adverse effects may include: physical destruction or damage; alterations that are inconsistent with the *Secretary's Standards for the Treatment of Historic Properties*, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access; removal of the property from its historic location; change of the character of the property's use or of contributing physical features within the property's setting; introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features; neglect or deterioration (except in certain religious or cultural cases); and transfer, lease, or sale of property out of Federal ownership or control without adequate preservation controls.

The following analysis is an assessment of the effects of the project on NRHP-eligible or listed historic properties and is based upon the Section 106 criteria of adverse effect.

DETERMINATION OF EFFECT

The determination of effects is organized by the historic properties located within the APE, starting with Benjamin Banneker Park, then in turn by alternative.

Benjamin Banneker Park

Banneker Park is significant for its design by renowned landscape architect Dan Kiley.

No-Action Alternative (Alternative A)

The no-action alternative would have an adverse effect on the overall integrity and character-defining features of Banneker Park because the social trail along the western hillslope would

remain, creating a potential for erosion that would detract from the integrity of the park's lawn and slope.

Alternative B

Under Alternative B, Banneker Park would be directly impacted. New elements would be added and alterations would be needed within the historic property. New curb ramps and striping of pedestrian crosswalks to the north, along the L'Enfant Promenade, would require the removal of minimal historic material, but would allow for complete ABA-accessibility from both sides of L'Enfant Promenade to the ABAAS-compliant pathways leading down the eastern hillslope of the park to Maine Avenue, SW, ultimately resulting in a beneficial effect.

The new temporary stairway would require alterations to the western hillslope; however, this would also have a beneficial effect in that it would remove the social trail and therefore minimize the potential for erosion. The curve of the stair is sensitively designed and would be compatible with Kiley's original design intent, having a no adverse effect on the historic fabric. The connection at the top of the stairway would be located where the Case Memorial Bridge pedestrian/bicycle ramp already interrupts the concrete wall; however the opening would be widened from 8 feet to between 16 and 20 feet. A portion of the existing riprap embankment would be removed and replaced with a retaining wall to accommodate the stairs and to provide sufficient room for the transition to the intersection and crosswalk at the Maine Avenue Fish Market. The removal of this historic fabric would modify contributing elements of the park, but would not cause an adverse effect, because these modifications will be done minimally and sensitively to have the least amount of effect as possible. Also, since the riprap embankment no longer contains the original vegetative material, the original erosion control system has lost integrity, thus reducing the potential for an adverse effect.

The removal of the paved pathway to the east would also result in a beneficial effect on the park. The path would be replaced by two ABAAS-compliant pathways in the same general area that will have both no adverse effects on the historic resource. The adverse effect would be the alteration of the slope and lawn where the proposed paths would be constructed, a slight disturbance to the turf grass, and slight alteration to the slope. The turf grass would be replaced in kind and the new grading for the pathways would be visibly imperceptible, causing no additional adverse effect. An approximately 40-foot section of Japanese yew would need to be removed from the southeast corner of the park at the Maine Avenue and Ninth Street, SW, intersection to accommodate the end of the ABAAS-complaint path, resulting in modifications to contributing elements of the park; however, the removal of the Japanese yew would not diminish the overall integrity of the park. New Japanese yew bushes would be installed along the edge of the south exit road from Tenth Street, SW, to Ninth Street, SW, to define the edge of the landscape improvements and control pedestrian traffic. In addition, the extant and new Japanese yew bushes will be maintained at an appropriate height so they will not create a tall barrier, but be at an appropriate height that creates a hedge like effect, two to three feet in height. The hedges will also guide pedestrians to follow the formal pathways within the park. Conversely, a beneficial effect would be that the pathways would provide universal accessibility between Tenth Street, SW, and Maine Avenue, SW. New wayfinding signage would be added to

direct pedestrians and bicyclists through the park; however, no historic material will be altered or removed to accommodate the new signage, therefore it would not cause an adverse effect. Even though the project would add new elements within the viewshed of historic properties in the vicinity, the new construction and landscaping would not diminish the integrity of viewsheds to and from the park. Overall, Alternative B would have no adverse effect on the historic resource.

Alternative C

Under Alternative C, Banneker Park would be directly impacted. New elements would be added and alterations would be needed within the landscape of the historic property. New curb ramps and striping of pedestrian crosswalks at the north, along the L'Enfant Promenade, would require the removal of minimal historic material, but would allow for complete ABA-accessibility from both sides of L'Enfant Promenade to the ABAAS-compliant pathway leading down the eastern hillslope of the park to Maine Avenue, SW, ultimately resulting in a beneficial effect.

The new stairway and ABAAS-compliant pathway to the east would require alteration of the slope and lawn. The curved design of the stairway and path would be sensitive to the form of the overlook, but the duplication of paths is not a sensitive design solution and would not be compatible with Kiley's original design intent, having an adverse effect on the historic fabric. Concurrently, the combined stairway and ABAAS-compliant pathway located to the east and leading only to the Maine Avenue, SW intersection near the Fish Market does not remove the adverse effect resulting from the extant social trail to the west. Slight disturbances to the turf grass, and slight alteration to the slope, would have to be made; however, the turf grass would be replaced in kind and the new grading would be visibly imperceptible, causing no additional adverse effect. A large portion of the riprap embankment would have to be removed to accommodate the stairway and pathway. While, consultation with DC SHPO would ensure that the smallest amount of historic fabric would be disturbed as possible, the action would result in an adverse effect.

Even though the project would add new elements within the viewshed of historic properties in the vicinity, none of the new construction and landscaping would block the viewsheds to and from the park, causing no additional adverse effect. The beneficial effect of universal accessibility from the stairway and ABAAS-compliant pathway would not outweigh the adverse effects of the design and lack of attention to the extant informal path. Overall, Alternative C would have an adverse effect on the historic resource.

East and West Potomac Parks Historic District

East and West Potomac Parks Historic District, which forms the southwest boundary of the APE, is significant for its relation to the monumental core of Washington, DC. The resource is located across the Washington Channel from Banneker Park and is currently visible to and from the park; however, The Wharf development will eventually block almost all views of Banneker Park from the historic district. Stretching from the Fish Market along Maine Avenue, SW, and I-395, one mile south to Arena Stage, the construction of the Wharf development will eventually

block most views of Banneker Park from East Potomac Park. Views from West Potomac Park have previously been blocked by the construction of I-395.

No-Action Alternative (Alternative A)

There would be no effect to the overall integrity or character-defining features of East and West Potomac Parks Historic District. While there would be no alteration to the landscape under the no-action alternative, the ongoing construction at the Wharf, which stretches from the existing Fish Market to a mile south along Maine Avenue, SW, will likely block most of the vistas of Banneker Park from East Potomac Park that are not already blocked by I-395.

Alternative B

Under Alternative B, there would be no effect to the overall integrity or character-defining features of East and West Potomac Parks Historic District. While there would be alteration to the landscape and vistas from East Potomac Park, the ongoing construction at the Wharf, which stretches from the existing Fish Market to a mile south along Maine Avenue, SW, will likely block most of the new construction.

Alternative C

Under Alternative C, there would be no effect to the overall integrity or character-defining features of East and West Potomac Parks Historic District. While there would be alteration to the landscape and vistas from East Potomac Park, the ongoing construction at the Wharf, which stretches from the existing Fish Market to a mile south along Maine Avenue, SW, will likely block most of the proposed alterations to Banneker Park.

Department of Housing and Urban Development

The HUD Building, located in the northeast corner of the APE, is significant for its Expressionist design executed by Marcel Breuer, and the use of precast and cast-in-place concrete for both structure and finish. Due to the topography of the site, from the HUD Building only the northeast section of Banneker Park is visible.

No Action Alternative (Alternative A)

There would be no effect to the overall integrity or character-defining features of the HUD Building.

Alternative B

There would be no effect to the overall integrity or character-defining features of the HUD Building, as the addition of the ABAAS-complaint pathways and stairway would be located on the southwestern and southeastern sides of the park and they would not be visible, at any point, from the building, as seen in **Image 16** on the following page.

Alternative C

Under Alternative C, there would be no effect on the overall integrity or character-defining features of the HUD Building, as the addition of the ABAAS-complaint pathway and stairway

would be located on the southeastern side of the park, neither would be visible, at any point, from the building.



Image 16: The view of Banneker Park from the HUD Building; note that only the northeast side of the park is visible, highlighted in red.

Lunch Room and Oyster Shucking Shed

The Lunch Room and Oyster Shucking Shed, located on Maine Avenue, SW, within the APE just south of the park, are significant as the only two remaining structures from the original Municipal Fish Market.

No Action Alternative (Alternative A)

There would be no effect to the overall integrity or character-defining features of the Lunch Room and Oyster Shucking Shed.

Alternative B

Under Alternative B, the improved connection would not result in adverse effects to the overall integrity or character-defining features of the Lunch Room and Oyster Shucking Shed.

Alternative C

Under Alternative C, the improved connection would not result in adverse effects to the overall integrity or character-defining features of the Lunch Room and Oyster Shucking Shed.

Washington Marina

The Washington Marina, located in the southwest corner of the APE, is significant for its association with the WPA and its relationship with DC's waterfront. The building is located to the west of the park; however, most views of the park from the marina are blocked by I-395.

No Action Alternative (Alternative A)

There would be no effect to the overall integrity or character-defining features of the Washington Marina Building.

Alternative B

Because of distance and sight-lines from Washington Marina to Banneker Park, it is likely that only a very small portion of the proposed ABAAS-compliant pathways to the east would be seen from the Washington Marina Building, shown in **Image 17** below. The stairway to the west would not be visible.

Alternative C

Because of distance and sight-lines from Washington Marina to Banneker Park, it is likely that only a very small portion of the proposed stairway and ABAAS-compliant pathway to the east would be seen from the Washington Marina Building.



Image 17: View of Banneker Park from the northeast corner of the Washington Marina Building; only a small portion of the park is visible, highlighted in red.

Jefferson Middle School

Jefferson Middle School, located on the eastern boundary of the APE, is significant for its Colonial Revival design, siting, proportion, and massing. Only the northwestern-most corner of Jefferson Middle School's football field has a direct view of Banneker Park, as shown in **Image 18** on the following page. There is no direct view of Banneker Park from the actual building, as a US Department of Agriculture Building is located in between the two resources.

No Action Alternative (Alternative A)

There would be no effect to the overall integrity or character-defining features of Jefferson Middle School.

Alternative B

Under Alternative B, there would be no adverse effect on the resource.



Image 18: A view of Banneker Park from the northwestern-most corner of Jefferson Middle School; note that any new construction on the west side of the park would not be seen from the historic resource.

Alternative C

Under Alternative C, there would be no adverse effect on the resource.

L’Enfant Promenade

L’Enfant Promenade, located within the APE directly north of Banneker Park, is significant for its association with the National Mall and its design by Pei and Weese. Significant viewsheds include the view south, from L’Enfant Promenade to Banneker Overlook and Potomac Parks, and the view north to Independence Avenue, NW. Due to the topography of the site, a majority of the southern slopes of the park are not visible from L’Enfant Promenade, only the central plaza is visible.

No Action Alternative (Alternative A)

There would be no effect to the overall integrity or character-defining features of L’Enfant Promenade.

Alternative B

Under Alternative B, the top of the stairway to the west would likely be visible from the resource; however, would have an adverse effect, as the view has already been interrupted by the pedestrian path to I-395. The ABAAS-compliant pathways to the east would barely be visible from L’Enfant Promenade due to the topography of the site, shown in **Image 19** on the following page, causing no adverse effect.



Image 19: View of the proposed ABAAS-path entrance, highlighted in red, taken from the very southeast corner of L'Enfant Promenade.

Alternative C

Under Alternative C, only a small portion of the stairway and ABAAS-complaint pathway would be visible from the very southern end of L'Enfant Promenade, shown in Image 21 above; therefore, Alternative C would have no adverse effect on the resource.

SUMMARY OF DETERMINATION OF EFFECT

The Banneker Park Connection would provide universal accessibility and a clear connection between the National Mall, Tenth Street, SW, and Maine Avenue, SW, along Washington, DC's, southwest waterfront. As a federal property and a Nation Register-eligible property, the undertaking requires compliance with Section 106 of the NHPA. Following the process defined in 36 CFR 800, this report defined the APE, identified the historic resources within the APE, and analyzed the potential that each alternative has to affect those historic resources.

The application of the criteria of adverse of effect was applied to the no-action alternative and it was determined that there would be no adverse effect on the following properties within the APE: East and West Potomac Parks Historic District, Department of Housing and Urban Development, Lunch Room and Oyster Sucking Shed, Washington Marina, Jefferson Middle School, and L'Enfant Promenade. There would be an adverse effect to Benjamin Banneker Park.

The criteria of adverse effect was applied to Alternative B and it was determined that no adverse effect would result to any properties within the APE. There would be no adverse effect on Banneker Park.

Under Alternative C, no adverse effect would occur to the following properties within the APE: East and West Potomac Parks Historic District, Department of Housing and Urban Development, Lunch Room and Oyster Sucking Shed, Washington Marina, Jefferson Middle School, and L'Enfant Promenade. There would be an adverse effect to Benjamin Banneker Park.

In conclusion, the analysis revealed that the no-action alternative and Alternative C would both have adverse effects on Banneker Park. The no-action alternative does not include a solution to the extant social trail along the western hillslope of the park, which has the potential to erode and detract from the integrity of the lawn and slope; this would result in an adverse effect. Under Alternative C, which does not include a solution to the extant social trail, the incompatible design of the stairway and ABAAS-complaint path to the east, the removal of a large portion of the riprap embankment, and high retaining wall would result in an adverse effect.

Alternative B would not have an adverse effect on Banneker Park and the adjacent and surrounding historic resources within the APE because it would not diminish the integrity of character-defining features, or the overall integrity of historic resources. A summary of the assessment of effects can be found in **Table 2**.

Table 2: Summary of Adverse Effects

	<i>Alternative A (No-Action Alternative)</i>	<i>Alternative B (Preferred Alternative)</i>	<i>Alternative C</i>
<i>Benjamin Banneker Park</i>	Adverse Effects: extant social trail along western hillslope would remain, creating a potential for erosion of the lawn and slope, detracting from the integrity of the park.	No Adverse Effect	Adverse Effects: incompatible design of the combined stairway and ABAAS path would compromise the integrity of Kiley's design; the disruption of historic fabric with the riprap embankment.
<i>East/West Potomac Parks Historic District</i>	No Adverse Effect	No Adverse Effect	No Adverse Effect
<i>Department of Housing and Urban Development</i>	No Adverse Effect	No Adverse Effect	No Adverse Effect
<i>Lunch Room/Oyster Shucking Shed</i>	No Adverse Effect	No Adverse Effect	No Adverse Effect
<i>Washington Marina</i>	No Adverse Effect	No Adverse Effect	No Adverse Effect
<i>Jefferson Middle School</i>	No Adverse Effect	No Adverse Effect	No Adverse Effect
<i>L'Enfant Promenade</i>	No Adverse Effect	No Adverse Effect	No Adverse Effect

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DOCUMENTATION OF SECTION 106 CONSULTATION

The NPS conducted public involvement during the Section 106 process to provide an opportunity for the public to comment on the proposed action. Consultation and coordination with federal and District agencies, American Indian tribes, and other interested parties was also conducted to identify issues and/or concerns related to natural and cultural resources. This section provides a brief summary of the public involvement and agency consultation and coordination that occurred during planning of the Banneker Park Connection project.

PUBLIC INVOLVEMENT

As a part of the NEPA process, and to comply with the requirements of Section 106 of the NHPA, the NPS and NCPC involved the public in project planning by conducting a forty-five-day public and agency scoping period from July 20, 2015 through September 2, 2015. The public, agencies, and stakeholders were invited to submit comments on the project during this time period. In addition, a public open house was held on Tuesday, August 11, 2015 that provided citizens with an opportunity to learn about the proposed Banneker Park Connection project; identify any areas of concern regarding the proposed project; provide the opportunity for the public to share their knowledge of important environmental and cultural issues that should be considered during planning; and gain public feedback to help inform the development of project alternatives. A total of 36 individuals signed-in at the public open house. The majority of public comments were from individuals living near the project area. Most public comments expressed support for the project. Most notably, commenters expressed the desire to make the connection user-friendly for pedestrians and bicyclists.

AGENCY CONSULTATION AND COORDINATION

The NPS conducted several agency consultation and coordination activities during planning for the proposed pedestrian connection at Banneker Park. Consultation and coordination included:

- An agency scoping meeting held on August 20, 2015 to discuss the proposed action; present conceptual alternatives; determine potentially applicable laws, regulations, and/or requirements related to the project; and to identify potential issues and concerns. At this meeting, the agencies encouraged the NPS to develop additional concepts for the project, and to present them at future meetings for further discussion.
- A design pin-up session was held with the agencies on October 5, 2015 to address comments received during the agency scoping meeting and to present a wider range of alternatives for consideration.
- A consulting parties meeting was held on November 12, 2015 as part of the Section 106 process to present refined project alternatives, the draft APE, and to discuss potential

issues and concerns related to historic preservation with the agencies and other consulting parties. Several concepts were dismissed from further consideration as a result of discussions during the consulting parties meeting. The consulting parties were supportive of Alternative B because the proposed ABAAS-compliant paths would provide access to both the Maine Avenue, SW, intersection near the Fish Market, and the Maine Avenue and Ninth Street, SW, intersection. Also, the consulting parties preferred the lower retaining wall height under Alternative B, as compared to the other alternatives.

The following agencies and stakeholders were contacted to request input on the project:

- Advisory Council on Historic Preservation
- Advisory Neighborhood Commission 6D
- Arena Stage at the Mead Center of American Theater
- Bicycle Advisory Council
- The Committee of 100
- The Cultural Landscape Foundation
- DC Preservation League
- DC Council
- DC Department of Energy and the Environment
- DC Department of Parks and Recreation
- DC Department of the Environment
- DC Department of Transportation
- DC Office of Disability Rights
- DC Office of Planning
- DC State Historic Preservation Office
- Delaware Nation
- Executive Office of the Mayor
- General Services Administration
- Harbour Square Board of Directors
- Historical Society of Washington DC
- International Committee for the Documentation of Buildings, Sites, and Neighborhoods for the Modern Movement
- Jefferson Middle School Academy
- National Mall Coalition
- National Trust for Historic Preservation
- Office of Advisory Neighborhood Commissions
- Preservation Action
- Southwest Business Improvement District
- Southwest Neighborhood Assembly
- Tiber Island Cooperative
- Trust for the National Mall
- U.S. Commission of Fine Arts
- U.S. General Services Administration
- U.S. Fish and Wildlife Service
- Washington Area Bicyclist Association
- Waterfront Gateway Neighborhood Association
- Over 30 local residents (names excluded for privacy)

REFERENCES

DC State Historic Preservation Office (DC SHPO)

- 2009 DC Inventory of Historic Sites. DC Historic Preservation Office, Historic Preservation Review Board. 2009.
- 2011 “Determination of Eligibility Form: Federal Office Building 5, James Forrestal Building.” DC State Historic Preservation Office, Historic Preservation Review Board. October 27, 2011.
- 2012a “Determination of Eligibility Form: Washington Marina Buisling.” DC State Historic Preservation Office, Historic Preservation Review Board. January 25, 2012.
- 2012b “Phase 1A Archeological Assessment of the Southwest Waterfront, Washington, DC.” Prepared for DC Historic Preservation Office, Historic Preservation Review Board. February 2012.

National Capital Planning Commission (NCPC)

- 2011 *Memorials and Museums Master Plan*.
Online: [http://www.ncpc.gov/ncpc/Main\(T2\)/Planning\(Tr2\)/2MPlan.html](http://www.ncpc.gov/ncpc/Main(T2)/Planning(Tr2)/2MPlan.html). Accessed November 20, 2015.
- 2013 *SW Ecodistrict Plan*. Online: <http://www.ncpc.gov/swecodistrict/>. Accessed November 23, 2015.
- 2015 *Programmatic Design Concept Summary 10th Street, SW and Interim Banneker Connection*. The SW Ecodistrict. Online:
http://www.ncpc.gov/plans/SW_Ecodistrict_Design_Summary.pdf. Accessed March 14, 2016.

National Park Service

- 2001 East and West Potomac Parks Historic District Nomination. National Register of Historic Places, National Park Service, Washington, DC.
- 2008 Department of Housing and Urban Development National Register Nomination. National Register of Historic Places, Natinal Park Service, Washignton, DC.
- 2013 Cultural Landscapes Inventory: Benjamin Banneker Park. National Mall & Memorial Parks, National Park Service, Washington, DC.

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APPENDIX A

MEETING SUMMARIES

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BENJAMIN BANNEKER PARK PEDESTRIAN ACCESS IMPROVEMENTS

Interagency Scoping Meeting Summary

August 20, 2015

An interagency scoping meeting was held at the NCPC offices on August 20th, 2015 for the Banneker Park Pedestrian Access Improvements project. The following representatives attended the meeting. A copy of the sign-in sheet is provided as **Attachment 1**.

Name	Agency/Company	Email
Frederick J. Lindstrom	Commission of Fine Arts (CFA)	flindstrom@cfa.gov
Sarah Batcheler	Commission of Fine Arts (CFA)	sbatcheler@cfa.gov
Melissa Bird	DC Office of Planning (DCOP)	melissa.bird@dc.gov
Patricia Zingsheim	DC Office of Planning (DCOP)	patricia.zingsheim@dc.gov
Andrew Lewis	DC State Historic Preservation Office (DC SHPO)	andrew.lewis@dc.gov
Matt Robinson	DC District Department of Energy and Environment (DOEE)	matthew.robinson@dc.gov
Cesar Barreto	District Department of Transportation (DDOT)	cesar.barreto@dc.gov
Stephen Rice*	District Department of Transportation (DDOT)	stephen.rice@dc.gov
Kim Daileader	EHT Traceries Inc. (Traceries), historic preservation consultant	kim.daileader@traceries.com
Laura Hughes	EHT Traceries Inc. (Traceries), historic preservation consultant	laura.hughes@traceries.com
Matt Steenhoek	Hoffman-Madison Waterfront LLC (HMW), project developer	msteenhoek@pnhoffman.com
Cheryl Kelly	National Capital Planning Commission (NCPC)	cheryl.kelly@ncpc.gov
Elizabeth Miller	National Capital Planning Commission (NCPC)	elizabeth.miller@ncpc.gov
Meghan Spigle	National Capital Planning Commission (NCPC)	meghan.spigle@ncpc.gov
Eliza Voigt	NPS National Mall and Memorial Parks (NAMA)	eliza_voigt@nps.gov
Joel Gorder	NPS National Capital Region (NCR)	joel_gorder@nps.gov
Brett Schrader	Stantec Consulting Services Inc. (Stantec), environmental compliance consultant	brett.schrader@stantec.com
Mike Sybert	Stantec Consulting Services Inc. (Stantec), environmental compliance consultant	mike.sybert@stantec.com
Otto Condon	Zimmer Gunsul Frasca Architects LLP (ZGF), architect	otto.condon@zgf.com

**Via Teleconference*

Introduction

The interagency scoping meeting began with introductions. Stantec provided a brief overview of the agenda and stated the purpose of the meeting was to obtain feedback from the agencies on the proposed action and any environmental issues to be analyzed in greater detail in the Environmental Assessment (EA), including policies, guidelines, or other requirements for which the project should comply. The meeting also serves as initiation of Section 106 consultation for the project. A copy of the meeting agenda is provided as **Attachment 2**. This summary generally follows the presentation that was prepared by Stantec and used to facilitate the meeting. A copy of the presentation is provided as **Attachment 3**.

Proposed Action

Following introductions, Stantec continued by providing an overview of the proposed action, which includes the construction of a connection between the National Mall and the waterfront along Maine Avenue, SW, for pedestrians and bicyclists at Banneker Park. The connection would include an interim stairway and ADA compliant ramp between the overlook at Banneker Park and the southwest waterfront near the Hoffman-Madison Waterfront (the Wharf). The NPS is the lead federal agency for the project because Banneker Park is administered by National Mall and Memorial Parks (NAMA). NCPC has been identified as a cooperating agency and will review and approve the project under its authorities set forth by the National Capital Planning Act. Stantec stated that the project is considered an “interim” project because anticipated redevelopment along 10th Street, SW, as envisioned in the SW Ecodistrict Plan, may necessitate the design of a permanent connection at this location in the near future. Also, Banneker Park is listed as a “prime” site in the NCPC Memorials and Museums Master Plan and therefore may eventually be the site for a future commemorative work.

Purpose and Need

The agencies were provided the opportunity to review the purpose and need statements prepared for the project by the NPS and NCPC. The purpose of the stairway and ramp is to provide a safe, functional, and aesthetically pleasing pedestrian connection between the Banneker Overlook and the southwest waterfront. The project is needed to improve connectivity by providing greater accessibility between the waterfront, Banneker Park, the National Mall, and surrounding areas.

Policy Overview

This project constitutes a federal action that requires NPS to comply with the National Environmental Policy Act (NEPA). Stantec continued by stating that to comply with NEPA, the NPS will soon begin to prepare an EA that will include discussions of the project purpose and need, a range of alternatives, the analysis of environmental impacts, and the public involvement and agency coordination efforts that have occurred during planning. The project is currently in a public comment period that began on July 20th and will end on September 2nd. NPS held a public open house on Tuesday, August 11, 2015 that had 35 attendees.

This project must also comply with Section 106 of the National Historic Preservation Act, which requires federal agencies to consider a project’s effects on historic properties. Stantec mentioned that the NPS and NCPC have initiated consultation under Section 106 with the DC State Historic Preservation Office (DC SHPO) and have identified a preliminary Area of Potential Effect (APE) for the project. In addition, meeting participants at the recent public open house were encouraged to comment on historic preservation issues and were provided information on how to participate as a consulting party for the project. One attendee of the public open house requested to be a consulting party.

Relevant Planning Documents

Following a brief overview of NEPA and Section 106, Stantec presented two relevant planning documents related to the project beginning with the 2010 National Mall Plan. This Plan, prepared by NPS, recognizes that better connections are needed for pedestrians and bicyclists between the National Mall, surrounding city and transportation networks, and the waterfront. Stantec continued into a brief discussion of the SW Ecodistrict Plan, another relevant planning document that was accepted by NCPC in January 2013 in an effort to create a sustainable and more livable urban environment within southwest DC. The Plan involves a 15-block federal precinct just south of the National Mall and includes projects along 10th Street, SW (also known as the L'Enfant Promenade) and at Banneker Park. The Plan was completed in partnership with 17 federal and DC agencies that together made up the SW Ecodistrict Task Force. The inclusion of a pedestrian connection at Banneker Park in the SW Ecodistrict Plan provides additional relevant planning documentation that a connection between the National Mall and the waterfront at this location is supported by the agencies.

Site Description

At this point, the presentation was resumed by EHT Traceries (Traceries), who provided a description of Banneker Park, its history, and also walked the meeting participants through a variety of photos of the project area and its surroundings. Originally known as the 10th Street Overlook, the park comprises the southern terminus of the L'Enfant Promenade in southwest Washington, DC. The 10th Street Overlook was renamed Benjamin Banneker Park in honor of Benjamin Banneker, a free African American who charted the stars for the first survey of Washington, DC. Designed by Dan Kiley and constructed in 1967-1969, Banneker Park includes an approximately 200-foot wide elliptical plaza that contains a water fountain surrounded by London plane trees, and provides benches, trash receptacles, and interpretive signage. The rest of Banneker Park is comprised of grass fields that slope steeply down to Maine Avenue, SW. From the overlook, visitors are afforded views of the waterfront, Washington Channel, and East Potomac Park. Banneker Park was determined eligible for listing in the National Register of Historic Places (NRHP) in 2014.

Traceries continued by mentioning that the original landscape design for Banneker Park included yews and 726 dogwoods, of which only about ten remain. The CFA asked what happened to the original trees. Traceries responded that most died shortly after being planted. The CFA asked what the land and topography was before the park was created, and DC SHPO clarified that the space for the elliptical overlook was delineated on IM Pei's L'Enfant promenade plans although not fully designed at that time. Traceries added that the land was resculpted in the 1960s to be higher in elevation and that it is most likely comprised entirely of fill material from highway construction in the area. HMW added that the original grade of the site is similar to the grade at Maine Avenue. NPS stated that the Cultural Landscape Inventory (CLI) prepared for Banneker Park, which can be found on the NPS's Planning, Environment, and Public Comment (PEPC) website, includes a very detailed site history.

NCPC asked if Banneker Park is designated as a monument. Traceries responded that it is not officially designated as a monument. NCPC stated that there should be clarification, as monuments are officially designated by congress. Traceries clarified that the Banneker Park is significant for its association with Dan Kiley, but was named in honor of Benjamin Banneker.

NCPC asked if the vegetation on the southern slope was planted for soil stabilization purposes. Traceries responded that originally, rockspray was planted, but has since been replaced with honeysuckle and sumac, and rip-rap can be seen under the existing vegetation.

DC SHPO asked if the wall along the outer edge of Banneker Circle is an original element of the overlook. Traceries responded that the wall is original but the cut in the wall was made in the 1970s to accommodate the I-395 pedestrian bridge connection.

DDOT asked what the running slope is for the existing asphalt pedestrian path on the east side of Banneker Park. ZGF responded that the slope is 5.5% - 6%. The CFA added that the path was installed to cover up an existing social path. DDOT asked when the path was added; CFA said it was likely 20 years ago. DDOT stated that the path should have been brought into compliance with the Americans with Disability Act (ADA). The team agreed that this project will bring pedestrian facilities at Banneker Park into ADA compliance.

HMW said that the Wharf development is designed to maintain the viewshed from the overlook at Banneker Park. The DCOP included that the USDA site adjacent to Banneker Park at 9th Street and Maine Avenue is likely to be redeveloped in the future; a large scale residential property is anticipated in about five years. The DCOP stated that this development is not part of the SW Ecodistrict Plan but should be considered during future planning efforts.

Potential Alternatives

Stantec presented potential alternatives for the improved pedestrian connection. To begin, Stantec presented the original Interim Banneker Connection concept designs that were developed as part of the SW Ecodistrict Plan. These concepts were developed by the SW Ecodistrict Task Force who met three times to define the project's scope, assess alternatives, and select a preferred concept. Each agency also appointed a staff person to the Working Group which participated in six workshops. Public input was obtained through NCPC's website and two public meetings. The concepts for 10th Street and Interim Banneker Connection were reviewed by CFA in November 2013 and by NCPC in January 2014.

The CFA stated that they had previously reviewed the concepts for the 10th Street, SW improvements, which included comments on the Interim Banneker Connection but did not approve the concept design. A letter was prepared and sent to NCPC detailing CFA's comments. Comments included: support of the general location; a request that the design be refined to be simplified; a request to eliminate the small retaining walls on the west side of the park; and the suggestion to soften the walls with careful grading and landscaping. A copy of the aforementioned CFA letter is included as **Attachment 4**.

Design Objectives and/or Requirements

Stantec provided a brief overview of design objectives for the project, as well as several requirements of which the project will need to comply. These include improvements to pedestrian crosswalks, providing universal accessibility, including ADA, providing a bicycle-friendly connection, landscaping, lighting, stormwater management, and preparing a low maintenance design.

DCOP asked if there is the potential for additional tree plantings. HMW said that the opportunity exists but there is hesitancy due to the history of tree survival at the site. The CFA added that the viewsheds and the character of the overlook need to be maintained. Adding too many trees may limit views of the waterfront as the trees mature.

Stantec stated that, comments were recently received during the public comment period expressing concerns that the new intersection where the proposed stairway would connect to Maine Avenue is unsafe for pedestrians in its existing configuration. However, these concerns will be addressed during a future phase of the Wharf development construction by implementing a DDOT-approved crosswalk with bollards installed within the median of Maine Avenue to prevent illegal vehicle movements, such as U-turns within the pedestrian crosswalk.

Concept #1

Following the discussion of design objectives and requirements, Stantec continued the presentation by presenting the preliminary concepts that have been developed for scoping under the NEPA process. Under Concept #1, both the proposed stairway and ramp would be located on the west side of Banneker Park. A portion of the wall along Banneker Circle would have to be removed to provide access to the stairway and ramp from the existing sidewalk. To accommodate the ramp at this location and to make the ramp ADA compliant, several switchbacks with resting platforms would be necessary to gradually elevate the ramp to the overlook.

The CFA stated that if the project should become permanent, it must meet certain requirements. CFA said that they were uncertain they would support Concept #1 should it become permanent. The NPS stated that this concept has been included in the NEPA process because of the difference in the visitor experience along the proposed ADA ramp between the concepts.

ZGF stated that this particular concept was developed due to the physical constraints present at the site. The steep slope from the overlook down to Maine Avenue necessitated this type of design in order to be ADA compliant. In addition, placing the stairway and ramp on this side of Banneker Park considers the future Wharf redevelopment. The placement of the connection would allow for views from the stairway and ramp toward the fish market and beyond to the waterfront.

DC SHPO questioned why there were only two concepts. ZGF said that there were multiple concepts developed as part of the SW Ecodistrict Plan, but the number was reduced as comments were received from the agencies, which assisted the Task Force to eventually reach a preferred concept. ZGF was asked if it would be possible to design a connection that included the stairway and ramp together. ZGF was uncertain if this would be possible, particularly on the west side of Banneker Park, due to the steepness of the slope at that area. DC SHPO encouraged the NPS to develop additional concepts and presenting them at the future Section 106 consulting parties meeting.

The CFA questioned the location of the upper platform, since it would not easily be visible from the 10th St pedestrian crosswalks. CFA also questioned the bike-friendliness of the switchback configuration and asked DDOT if a straight ramp would be better than curved ramps for ADA. DDOT confirmed that straight ramps are preferred. CFA asked how the future 10th Street Corridor improvements would affect the vehicular circle on the overlook and how the placement of ramps could facilitate connections to local bike trails. ZGF stated that there are opportunities to reconfigure the roadway. Its width of 20 feet would allow for a bicycle lane by narrowing the vehicular travel lane, which is not heavily used. NCPC also mentioned that the road configuration could change if the parks use changes. DC SHPO added that the elliptical plaza of the overlook and the retaining walls are the relevant portions, not the roadway.

Concept #2

Under Concept #2, the proposed stairway would be constructed on the west side of Banneker Park. The current wall opening for bicycle and pedestrian connections to the I-395 pedestrian bridge would be widened to provide access for the stairs. The stairs would lead down the grass slope of the park and connect with the new signalized intersection at Maine Avenue, SW, which has been created as part of the Wharf redevelopment. In addition, the existing path to the east of the overlook would be improved and made ADA-compliant under this concept.

DC SHPO wanted to know what was indicated in green on the concept plan. ZGF stated that landscaping would be installed in the areas shaded green. CFA stated that it would be helpful for future meetings to provide graphics with topography and elevations for landings and tops-of-walls.

DDOT suggested using cut and fill to make a wider curve ramp further to the west of the stairway that would function as a steep sidewalk with landings. CFA stated that that would require high retaining walls. DC SHPO asked if there would be any benefit to include trenching. HMW said trenching could accentuate grading issues. CFA suggested that the project team look into the geometry of the circle to assist with design development.

ZGF stated that the current opening in the wall at the I-395 pedestrian connection was used in the design of Concept #2 since removing additional sections of the existing wall would result in more impacts to the historic resource. The existing opening would need to be widened only slightly under this concept. DC SHPO stated that if the design could combine ADA accessibility with the stairs, impacts to the wall can be tolerated.

DDOT asked if an outdoor elevator has been considered and also stated that separating the ADA path from the stairway may present some issues with disabled users as it would provide a different experience and a feeling of being segregated. Stantec stated that one of the comments received from the public was regarding the use of a skywalk with elevator. ZGF stated that development of a museum in the future could include an elevator. The CFA stated that the ramp is not solely for ADA use; other users, such as bicyclists and pedestrians with strollers, would use the ramp. Furthermore, outdoor elevators require significant maintenance and are costly.

DC SHPO suggested placing both the stairs and the ADA compliant ramp on the east side of the overlook. This could potentially eliminate the impacts to the wall. HMW suggested including an additional extension to the ADA ramp that would split off and meet the proposed stairway at the bottom of the hill along Maine Avenue. ZGF said it was worth investigating. Traceries said that many users would likely continue to use the existing social path on the west side of the park if stairs or ramps were not located there.

The CFA suggested rendering the future Wharf construction on the concept mapping so that the connections make more sense contextually.

DCOP suggested that if the separate ADA ramp was designed to include landscaping, it would be viewed as more of an equal to the proposed stairway. ZGF said that the original proposal had plantings to make the path as pleasant as possible.

Preliminary Area of Potential Effect (APE)

The preliminary APE was presented to the agencies at the meeting; Stantec suggested that the preliminary APE could be reduced, stating that the proposed pedestrian connection is not likely to be visible at historic properties such as the Arena Stage, St. Dominic's Church, the Cotton Annex, and Washington Marina. DC SHPO said they were amenable to tightening the APE, but it may be best to leave it as is to ensure that all bases are covered.

CFA asked that the Fish Market also be depicted as a historic property on the APE map; however, the DC SHPO stated that the fish market is not eligible for listing in the NRHP; however, the DC SHPO stated that the fish cleaning shed at the Fish Market has been determined eligible for listing. Stantec agreed to include the fish cleaning shed on the APE map. DC SHPO stated that 10th Street is an eligible resource as well that should be identified on the APE map.

Traceries asked if the East/West Potomac Park should be included in the APE. DC SHPO said they did not anticipate effects to the East/West Potomac Park, but the CFA said that it should be left in the APE because there will still be views from the overlook. Stantec and Traceries agreed to review the preliminary APE, revise where appropriate, and submit a revised APE map to the project team for review at a later date.

Planning Issues and Concerns

During internal scoping and since the beginning of public scoping, the project team has identified several potential issues or concerns that will likely require a more detailed analysis in the EA document and Assessment of Effect under the Section 106 process. Issues and concerns presented at the meeting were as follows:

- Banneker Park is eligible for listing in the National Register and so there is a potential for the proposed project to have adverse effects on the property.
- Construction of the pedestrian connection would add new features into the Dan Kiley-designed landscape and the viewshed, particularly from the waterfront.
- Several historic properties or properties eligible for listing in the National Register are located in the vicinity of Banneker Park that could be affected.
- The proposed stairway and ramp would result in an increase of impervious surface area.
- Vegetation (turf grass, sumac, and honeysuckle) would be removed to construct the connection and the ability for the site to infiltrate stormwater would be slightly reduced.
- Configuration of ramps and staircases would impact bicycle trail connections.
- Regarding stormwater management, the Energy Independence and Security Act (EISA) is an applicable regulation that would apply to this federal (NPS) site. EISA uses the 95th percentile storm event (1.7") for stormwater management.

Stantec asked if the agencies had identified any other issues or concerns that the project team should consider. No other issues or concerns were identified at this time.

Regarding stormwater management, DOEE stated that it would be worth investigating pervious surfaces if the slopes of the proposed stairway and ramp are under 5%. DOEE and DDOT have standards for using pervious materials. DOEE also stated that bioswales or some other form of infiltration system could be used to manage stormwater, if necessary. DOEE regulates projects with disturbance of greater than 5,000 square feet. DOEE stated that projects in Washington, DC are subject to DC requirements, which include design standards for low-impact development. DOEE encouraged the project team to look at the standards on their website.

DOEE also suggested talking to the Urban Forestry Administration (UFA) to determine the best low-maintenance tree species to use at the site. Concerns were brought up regarding the low survival of the original plantings and if new tree plantings would be successful. CFA asked if any soil borings have been conducted at the site. HMW said that they are currently working with the NPS to gain access to the site to conduct geotechnical borings. HMW mentioned that they would also look into conducting environmental borings that may help to determine if soils on the site are suitable for tree plantings. DOEE stated that with soil amendments, tree plantings can be installed in fill material with a high probability of success.

Project Schedule

After the project schedule was presented to the agencies, the NPS suggested delaying the consulting parties meeting, tentatively scheduled for the week of September 21st, so ZGF will have more time to revise the existing concepts and prepare new concepts as requested by the agencies. ZGF agreed, stating that having additional time to take into account the discussions held at this meeting would be appreciated.

DC SHPO encouraged the project team to develop additional concepts or variations and also suggested that an agency working group meeting be scheduled prior to the Section 106 consulting parties meeting. This agency working group meeting would allow ZGF the opportunity to present their work on the alternatives

over the next few weeks and will allow the agencies to actively assist with their continued development. CFA requested that site sections and renderings be available at the future agency working group meeting.

DC SHPO asked if there were any historic preservation concerns at the public open house. Stantec responded that there were not.

CFA stated that the Cultural Landscape Foundation will be interested in any impacts to a Dan Kiley-designed landscape.

DDOT asked how diverse the attendees were at the public open house, and if any disabled members of the community provided comments. NCPC stated that many of the attendees were elderly. DDOT suggested contacting the Office of Disability Rights as it will be good to have their input moving forward.

Action Items

During the interagency scoping meeting, the following items were discussed but were not completely resolved or require further attention.

1. ZGF will update the current concept plans to account for comments received in the 2014 CFA letter and during public and agency scoping. As requested by CFA, concept plans will include topography / elevation to assist with visualization. Additionally, the future Wharf redevelopment will be included on the concepts to provide context. ZGF will also provide site sections for upcoming meetings as visual aids.
2. As requested by the agencies, ZGF will prepare additional concepts and/or variations of the proposed action to present at future meetings with the agencies and a Section 106 consulting parties meeting. This is to include having both the stairs and the ADA ramp run exclusively along the east side of Banneker Park as well as a variation of Concept #2 wherein the ADA ramp curves back west to meet the proposed stairway.
3. Stantec will prepare an interagency scoping meeting summary to be reviewed by the project team and the agencies.
4. HMW will perform geotechnical borings to inform the development of alternatives and design elements.
5. Stantec will include the Office of Disability Rights in future correspondence with the agencies regarding the project alternatives in order to gain input regarding ADA.
6. An additional agency meeting will be scheduled tentatively in late September to present revisions to existing concepts and additional concepts to the agencies.
7. A Section 106 consulting parties meeting will be scheduled in early October to present the latest project alternatives prepared by the project team.



BENJAMIN BANNEKER PARK PEDESTRIAN ACCESS IMPROVEMENTS

Agency Pinup Design Session

October 5, 2015

An agency pinup design session was held at the ZGF Architects offices on October 5th, 2015 for the Banneker Park Pedestrian Access Improvements project. The following representatives signed in at the meeting. A copy of the sign-in sheet is provided as **Attachment 1**.

Name	Agency/Company	Email
Frederick J. Lindstrom	Commission of Fine Arts (CFA)	flindstrom@cfa.gov
Thomas Luebke	Commission of Fine Arts (CFA)	tluebke@cfa.gov
Anwar Mahmood	DC Office of Disability Rights (ODR)	anwar.mahmood@dc.gov
Melissa Bird	DC Office of Planning (DCOP)	melissa.bird@dc.gov
Andrew Lewis	DC State Historic Preservation Office (DC SHPO)	andrew.lewis@dc.gov
Kim Daileader	EHT Traceries Inc. (Traceries)	kim.daileader@traceries.com
Rodney L. Moulden	U.S. General Services Administration (GSA)	rodney.moulden@GSA.gov
Marty Dubroff	U.S. General Services Administration (GSA)	martin.dubroff@GSA.gov
Matt Steenhoek	Hoffman-Madison Waterfront LLC (HMW)	mstenhoek@pnhoffman.com
Diane Sullivan	National Capital Planning Commission (NCPC)	diane.sullivan@dc.gov
Meghan Spigle	National Capital Planning Commission (NCPC)	meghan.spigle@ncpc.gov
Eliza Voigt	NPS National Mall and Memorial Parks (NAMA)	eliza_voigt@nps.gov
Mike Commisso	NPS National Mall and Memorial Parks (NAMA)	michael_commisso@nps.gov
Catherine Dewey	NPS National Mall and Memorial Parks (NAMA)	catherine_dewey@nps.gov
Brett Schrader	Stantec Consulting Services Inc. (Stantec)	brett.schrader@stantec.com
Mike Sybert	Stantec Consulting Services Inc. (Stantec)	mike.sybert@stantec.com
Otto Condon	Zimmer Gunsul Frasca Architects LLP (ZGF)	otto.condon@zgf.com
Greg Matto	Zimmer Gunsul Frasca Architects LLP (ZGF)	greg.matto@zgf.com

Introduction

Stantec opened the meeting by welcoming the attendees and stating the purpose of the meeting, which was to review the concept alternatives developed during the SW Ecodistrict Plan, highlighting design goals, critical dimensions, and grading studies; review the potential alternatives developed in response to comments received at the August 20th interagency scoping meeting and during public scoping; and to assist the project team to further develop/refine project alternatives.

SW Ecodistrict Plan

ZGF continued by describing the history of the project, including the development of alternatives by the SW Ecodistrict Task Force, and provided conceptual renderings of the Banneker Park pedestrian connection that was developed and eventually approved by NCPC as part of the SW Ecodistrict Plan. ZGF stated that during the Planned Unit Development (PUD) process for the Wharf, areas were identified that could be built upon that would maintain a 100-foot view corridor from the overlook at Banneker Park to the waterfront. Maintaining this view corridor, as well as the temporary nature of the pedestrian connection, was taken into account when developing the alternatives for the SW Ecodistrict Plan; however, the alternatives were designed so that the pedestrian connection may be maintained as the area develops in the future. Initially, a concept was presented to NCPC and CFA based on the PUD submission that took into consideration the 100-foot view corridor and the potential locations for future development at Banneker Park. Comments from the agencies suggested that this conceptual design for the pedestrian connection be more sympathetic to the overlook. Taking these comments into account, a revised concept was developed and eventually approved by NCPC that included a stairway that wraps around the west side of the overlook and also improved the existing path on the east side of Banneker Park to meet current ADA standards.

Public and Agency Scoping

ZGF continued into a discussion of the two initial concepts that were presented during scoping by the NPS and NCPC. Initial concepts included **Concept 1**, which proposes a stairway and ramp on the west side of Banneker Park. In order to accommodate the ramp at this location and to make the ramp ADA-compliant, several switchbacks with resting platforms would be necessary to gradually elevate the ramp to the overlook. The stairway and ramp would connect with the new signalized intersection at Maine Avenue, SW that has been created as part of the Wharf redevelopment. Under **Concept 2**, the proposed stairway would be constructed on the west side of Banneker Park. The stairs would lead down the grass slope of the park and connect with the new signalized intersection at Maine Avenue, SW that has been created as part of the Wharf redevelopment. In addition, the existing path to the east of the overlook would be improved and made ADA-compliant under this concept. Concept 2 is similar in many ways to the NCPC-approved SW Ecodistrict Plan concept. When these concepts were presented to the agencies during the August 20th scoping meeting, the agencies encouraged the project team to develop a wider range of alternatives for consideration.

Conceptual Alternatives

Following a brief discussion of the initial concepts presented during scoping, ZGF directed the meeting participants in a discussion regarding several new and modified alternatives, as requested by the agencies during the August 20th scoping meeting. Graphics presented at the meeting are included as **Attachment 2**.

Alternative A is the original PUD submission, in which the stairway is more angular, and includes an enhanced path to the east of the park. The grade of the path will be greater than five percent; therefore, in order to meet ADA standards, the path would require a handrail or would need to be regraded.

Alternative B is also the original PUD submission and includes a universal ADA ramp on the west side of Banneker Park. ZGF stated that in order to make the ramp ADA compliant, it would need to be over 400 feet long and would require several switchbacks to meet the required 5% grade.

Alternative C would create a universal experience on the east side of Banneker Park with a stairway and adjacent ramp. ZGF stated that this alternative would not address the two social trails that exist. GSA asked if a stair and ramp are both necessary. ZGF stated that only a ramp is necessary but both were included to showcase how a stair on the east side of the park could be designed to meet with the 100-foot view corridor and the Wharf intersection near the Fish Market.

Alternative 1 displays the areas where future development could potentially occur at Banneker Park. Alternative 1 is the same as Concept 1 described above that was presented during public and agency scoping.

Alternative 2b includes a stairway on the west side of the park as well as ADA-compliant paths on the east side to meet with both the Wharf intersection near the Fish Market and the intersection at Maine Avenue and 9th Street. Alternative 2b is similar to Concept 2 described above with some exceptions. Alternative 2b includes slight modifications to the stairway design and includes an additional ADA path section that begins on the east side of Banneker Park and wraps around the overlook to the Wharf intersection near the Fish Market. All of the ADA paths under Alternative 2b would be slightly less than 5% grade. ZGF stated that **Alternative 2c** is similar to Alternative 2b, but with a different stair configuration to pull the stair farther away from the overlook wall and to maintain the sympathetic arc desired by the agencies.

ZGF also presented a more detailed **Alternative 2 Refined**. This alternative most closely resembles the original NCPC-approved concept from the SW Ecodistrict Plan; however, modifications have been made to simplify the connection. Similar to Alternative 2b, the stairway as proposed in the refined alternative has been pushed farther away from the overlook retaining wall, terraced walls along the overlook have been removed, and terracing of the west side lawn has been eliminated. Also, the ADA paths have been revised to fit more cohesively into the landscape. ZGF stated that original designer, Dan Kylie, looked at the overlook as a terminus; this project will transition the overlook from a terminus to a connection. The project team needs to achieve this without changing the park, which is one of only a few green areas in the vicinity. The vertical grade makes universal access difficult to achieve, but the design should consider the park space from a people perspective.

Conceptual Alternative Discussion

ZGF opened the floor for discussion on the conceptual alternatives and their elements. The following topics were discussed by the project team and the agency representatives:

General Discussion of the Alternatives

- NCPC asked if the goal of this meeting is to eliminate alternatives. Stantec stated that it is fine to leave the meeting with multiple alternatives, but it would be helpful to have discussions that could assist the team to identify the alternatives to analyze in the EA and to determine the preferred alternative. NPS stated that multiple alternatives are preferred for the EA.
- DC SHPO asked for clarification regarding the differences in Alternatives 2b and 2c. ZGF said that Alternatives 2b and 2c are conceptually similar; but that it should be determined which of the two options will be most sympathetic to the overlook. DC SHPO said that Alternatives 2b and 2c appear to be the most compatible with the overlook and that introducing sharp geometrics would not be complimentary to Kylie's design.
- NPS stated that the switchbacks in Alternative 1 are too excessive. EHT Tracerics added that Alternative 1 will cut too much into the wall of the overlook, which is a contributing element to Banneker Park.
- NPS desired a combination of Alternatives A, 2b, and 2c. NCPC said that the original SW Ecodistrict design should be discussed in the EA.
- HMW said that Alternative A is similar but different from Alternative 2 and needs to be considered as a viable alternative moving forward.
- ZGF asked if the agencies wanted to carry forward the alternatives that have the most impacts and regrading. The agencies agreed that it would be worthwhile to carry these alternatives through the alternatives development process.

ADA Compliance of the Conceptual Alternatives

- DC ODR asked how the overlook can be reached currently by a wheelchair. NPS stated that the center of the overlook is open space but paved and can be accessed through the 10th street median.
- NPS asked if the two paths in Alternative 2b and 2c are ADA-compliant. ZGF stated that they were, with a slope of approximately 4.75%. CFA asked if this was achieved through small adjustments to the topography. ZGF said that there will be some regrading needed.
- CFA said that sidewalks north of the Banneker Overlook are very narrow and asked if they would be widened. ZGF stated that the idea would be to direct people towards the median of 10th Street. ZGF stated that bike paths could be added as well.
- DC ODR stated that stairs to the west of the overlook in Alternative A will need to be refined further; it is not user friendly and there needs to be more space at the upper landing. ZGF said that it is constrained by the opening in the wall. DC ODR stated that the project team should calculate how long it would take to travel by wheelchair on the path as designed in Alternative a. ZGF said that one of the goals is to eliminate the need for rails along the path.

Proposed Retaining Wall under Alternatives 2b and 2c

- NCPC asked if only one type of retaining wall will be analyzed for the Alternative 2 options. ZGF stated that for the planning process, the most impactful wall design will be analyzed; different wall options will be investigated further as design progresses. The NCPC stated that this will most likely be true for SWM options as well. ZGF stated that all alternatives have over 5,000 sq. ft. of additional impervious surface and will require SWM. SWM could be used to accentuate the entrance to Banneker Park.
- DC SHPO asked if the retaining wall along Maine Avenue at the bottom of the park would be green. ZGF said that there will be options for the design of the retaining wall. DC SHPO asked if it will be differentiated from the Kylie wall. ZGF said that it would be complimentary in form but not intended to mimic the Kylie design. DC SHPO stated that in order to get a finding of No Adverse Effect, the project team should make sure plantings are compatible with the Kylie design. A green wall is ideal as it blends in.

General Pathway Design

- CFA asked if the path that leads south is a social trail on the east side of the park, which was confirmed. EHT said that previously there were bushes around the perimeter of the park, which is why the social trail developed at its location.
- NPS asked if there will be permeable pavement used for the paths. ZGF said that this could be discussed in the next phase once all of the SWM requirements are determined.
- CFA said that he appreciated how the two paths come together at the Wharf crossing under Alternative 2b and 2c, but wishes that the paths could be wider.

Other Items Discussed

- CFA inquired about the nature of the lay-by south of the park on Maine Avenue. HMW stated that it is used by tour busses as a waiting area. The CFA asked if bus use will be more active in the future as the development of the Wharf progresses. NPS said that the busses normally park here but the destination of the passengers is the National Mall. CFA said that this could be a primary spot in the future with the development of the Wharf.
- DC SHPO asked if the rip rap along the slope of Banneker Park was part of the original design. EHT Traceries said that it was added once the bushes originally planted there died off; removing the rip rap will not likely be an impact to cultural resources.



BENJAMIN BANNEKER PARK PEDESTRIAN ACCESS IMPROVEMENTS

Section 106 Consulting Parties Meeting Summary

November 12, 2015

A consulting parties meeting was held at the ZGF offices on November 12, 2015 for the Banneker Park Pedestrian Access Improvements project. The following representatives attended the meeting. A copy of the sign-in sheet is provided as **Attachment 1**.

Name	Agency/Company	Email
Frederick J. Lindstrom	Commission of Fine Arts (CFA)	flindstrom@cfa.gov
Alisha Goldstein	DC District Department of Energy and Environment (DOEE)	alisha.goldstein@dc.gov
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Anwar Mahmood	District Office of Disabled Rights (DODR)	anwar.mahmood@dc.gov
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Otto Condon	Zimmer Gunsul Frasca Architects LLP (ZGF)	otto.condon@zgf.com

Introduction

The consulting parties meeting began with introductions. Stantec provided a brief overview of the agenda and stated the purpose of the meeting. The meeting served to move the Section 106 consultation for the project along and to obtain feedback from all consulting parties on the proposed action and the developed alternatives. A copy of the meeting agenda is provided as **Attachment 2**. This summary generally follows

the presentation that was prepared by Stantec and EHT Tracerics (Tracerics) and used to facilitate the meeting. A copy of the presentation is provided as **Attachment 3**.

Proposed Action

Following introductions, Stantec provided an overview of the proposed action, which includes the construction of a temporary connection at Banneker Park that include a stairway and Americans with Disabilities Act (ADA)-compliant ramp to provide improved pedestrian and bicycle access between 10 Street, SW and Maine Avenue, SW along the southwest waterfront. The National Park Service (NPS) is the lead federal agency for the project because Banneker Park is administered by National Mall and Memorial Parks (NAMA). The National Capital Planning Commission (NCPC) has been identified as a cooperating agency and will review and approve the project under its authorities set forth by the National Capital Planning Act. Furthermore, the project is considered “temporary” because anticipated redevelopment along 10th Street, SW, as envisioned in the SW Ecodistrict Plan may necessitate a permanent connection at this location in the future. Also, Banneker Park is listed as a “prime” site in the NCPC Memorials and Museums Master Plan and therefore may eventually be the site for a future museum or commemorative work.

Purpose and Need

The consulting parties were provided the opportunity to review the purpose and need statements prepared for the project. The purpose of the project is to provide a safe, functional, and aesthetically pleasing temporary pedestrian connection between the Banneker Park and the southwest waterfront neighborhood. The project is needed to improve connectivity by providing greater accessibility between the waterfront neighborhood, Banneker Park, the National Mall, and surrounding areas.

Policy Overview

This project constitutes a major federal action that requires the NPS and NCPC to comply with the National Environmental Policy Act (NEPA). Stantec stated that in order to comply with NEPA, the NPS will prepare an Environmental Assessment (EA) that will document the environmental consequences of a range of alternatives for the proposed temporary connection. Currently, the project team is finalizing the alternatives and is in the beginning stages of preparing the EA.

This project must also comply with Section 106 of the National Historic Preservation Act, which requires federal agencies to consider a project’s effects on historic properties. Stantec mentioned that the NPS and NCPC have initiated consultation under Section 106 with the DC State Historic Preservation Office (DC SHPO) and have identified a draft Area of Potential Effect (APE) for the project.

Relevant Planning Documents

Following a brief overview of NEPA and Section 106, Stantec presented two relevant planning documents related to the project, beginning with the 2010 National Mall Plan. This Plan, prepared by NPS, recognizes that better connections are needed for pedestrians and bicyclists between the National Mall, surrounding city and transportation networks, and the waterfront. Stantec continued into a brief discussion of the SW Ecodistrict Plan, another relevant planning document that was accepted by NCPC in January 2013 in an effort to create a sustainable and more livable urban environment within southwest DC. The Plan involves a fifteen-block federal precinct just south of the National Mall and includes improvements to 10th Street, SW (also known as the L’Enfant Promenade) and an interim pedestrian connection at Banneker Park. The inclusion of a pedestrian connection at Banneker Park in the SW Ecodistrict Plan, and the vision of improved pedestrian access as described in the National Mall Plan, affirms the need for the temporary connection between the National Mall and the waterfront that will be analyzed in the EA.

Site Description

Traceries next presented a brief description of Banneker Park. Originally known as the 10th Street Overlook, the park comprises the southern terminus of the L'Enfant Promenade in southwest Washington, DC. Designed by Dan Kiley and constructed during 1967-1969, Banneker Park includes an approximately 200-foot wide elliptical plaza that contains a water fountain surrounded by London plane trees, and provides benches, trash receptacles, and interpretive signage. The rest of Banneker Park is comprised of grass fields that slope steeply down to Maine Avenue, SW. From the overlook, visitors are afforded views of the waterfront, Washington Channel, and East Potomac Park. Banneker Park was determined eligible for listing in the National Register of Historic Places (NRHP) in 2014. The park is significant for its design by Dan Kiley and not for any association with Benjamin Banneker. The Commission of Fine Arts (CFA) asked if the park received a congressional designation to honor Banneker; the NPS stated that the park was named to honor Banneker, but it is not a congressional designation.

Traceries presented the contributing and non-contributing features of Banneker Park. This included a discussion about the topography of the site. The original landscape design for Banneker Park included Japanese yews and 726 dogwoods, of which only about 10 remain. It was reiterated that the trees may not have survived because they are an understory species and were exposed to too much sun. Additionally, the park was built on nutrient poor fill material from the construction of the adjacent Southwest Freeway which is also likely to have contributed to their lack of success. The slope and topography of the land are considered contributing elements of the park, as well as the lawn and remaining dogwoods and Japanese yews. Hoffman-Madison Waterfront (HMW) asked for clarification regarding the honeysuckle bushes and contemporary rip-rap wall on the southern portion of the park; it was stated at the meeting that the vegetation and rip-rap wall are non-contributing elements of the park. However, following the meeting, it was determined, based on a review of the Cultural Landscape Inventory (CLI) prepared for the park, that the rip-rap wall is a contributing element to the park's significance. The rip-rap wall was originally planted with rockspray cotoneaster, which has given way to invasive plants, which are non-contributing.

While reviewing the site plan of the park and the contributing and non-contributing features, NCPC asked to discuss the viewsheds that are protected from the park looking towards the Potomac River. It was stated at the meeting that all three views— to the southeast, south, and southwest— would be preserved. However, following the meeting, it was made clear that only the southwest viewshed would be preserved. The south and southeast viewsheds would be blocked by buildings to be constructed as part of the Wharf waterfront redevelopment. In addition, axial views to and from the plaza down the L'Enfant Promenade are also contributing views that would be preserved.

Design Objectives

The design objectives of the project were reiterated at this time. The main objective of this project is to provide a safe, functional, and aesthetically pleasing temporary pedestrian connection between the overlook at Banneker Park and the southwest waterfront. This will include improving existing pedestrian crosswalks with curb ramps and striping. The project will incorporate universal accessibility with 2% maximum cross slope and 5% maximum longitudinal slope with evenly spaced landings, so as not to require handrails. Neither of the social paths on the site achieves these standards. In addition to ADA accessibility, the park will provide bicycle-friendly design with curb ramps, bike troughs along the stairways, and an open transition area where L'Enfant Promenade, I-395 pedestrian bridge, and the new proposed stair will meet. Landscaping, lighting that meets current National Electrical Codes, or other NPS preferred lighting standards, and stormwater management will also be incorporated into the project.

Alternatives

ZGF Architects (ZGF) presented the three developed alternatives being considered for detailed analysis in the EA and for evaluation in the Assessment of Effects (AoE) Report for the improved temporary pedestrian connection. Alternative 1 includes a curved stair, wrapping around the west end of the park with two ADA-compliant paths on the east side. One path would curve to the intersection at 9th Street, SW, and the other would curve to the west and join with the proposed stair, providing ADA accessibility to the intersection near the Maine Avenue Fish Market.

Alternative 2 includes a stairway and adjacent ADA-compliant path both on the east side of the overlook. This alternative does not provide a solution to the social path (also known as a desire line) on the west side of the park, which would likely remain.

Alternative 3 is based on the design that is part of the final plans approved by the Zoning Commission during the Stage One Planned Unit Development (PUD) process for the Southwest Waterfront redevelopment project. Alternative 3 includes an angular stairway on the west side of the overlook and improvements to the existing pedestrian path on the east side of the overlook to provide ADA-accessibility, including constructing landings and installing handrails. As this alternative was being discussed, NCPC stated that this alternative has previously been considered in the planning and design process, and requested its dismissal from detailed analysis within the EA and AoE Report. NCPC continued that due to the potential for adverse effects resulting from the introduction of an angular stairway design into the curvilinear design of Banneker Park, and the inclusion of handrails to meet ADA requirements, this design would not be likely to receive approval by the Commission. DC SHPO and CFA agreed with the conclusion that Alternative 3 would likely result in adverse effects and NPS agreed to the request from NCPC to eliminate Alternative 3, the PUD submission, from the detailed analysis of the NEPA and Section 106 processes that would be required for approval to construct Alternative 3.

All three Harbour Square residents in attendance stated that they preferred Alternative 1, as the two ADA-compliant paths provide access to both crosswalks on Maine Avenue, SW and the lower wall (approximately 10 feet) at the west intersection would be preferable to a 16-foot wall, as proposed under Alternative 2. Furthermore, the residents approved of shifting the pedestrian crosswalks further away from the circle to improve safety.

DC SHPO asked if the modified design submitted by the District Office of Disability Rights (DODR) prior to the consulting parties meeting was considered by the project team. ZGF stated that while this design is simpler, it would drop pedestrians onto Maine Avenue mid-block, making persons with disabilities travel a farther distance to access the crosswalks. This concept is also likely to promote jaywalking and would not solve the issue of social paths being created. While no one from DODR was present at that time to discuss the design, it was decided by everyone that it would not be preferable.

Materials for the new stairway and paths were discussed. DC SHPO stated that concrete or pavers with differentiation from the original Kiley design with joints or a pattern for the stairs and asphalt for the paths would be acceptable. The design would have to be a clear departure from Kiley's design, while still being compatible. CFA said they would not be supportive of plain black asphalt and would prefer a colorized or potentially porous asphalt material. NPS stated that they have a new standard for colorized aggregate asphalt they are introducing throughout their parks and that this could be a good fit with Banneker.

The NPS asked if trees will be replanted on the lawn. CFA suggested that the trees along the east ADA path on Alternative 1 be moved to the west side of the path, as this would provide shade in the hot afternoon sun.

NPS questioned the presence of the trees along this path altogether, as they would strengthen the path's presence when it is not an original feature of the park.

Reestablishing Kiley's grid of trees was discussed. It was suggested that reintroducing a limited fragment of the grid, but not identical to the original grid would be respectful of Kiley's original intention. CFA suggested considering a different species of trees, as the original dogwoods did not perform well in this location; however, any replacement species should be of a limited height, in order to best preserve the viewsheds from the park. NPS agreed that changing the species of trees to one that would have a higher likelihood of success with the existing soils and shade conditions would be preferred and that it is their intention to preserve the character of Kiley's design, not the specific species or the specific layout in its entirety. NPS suggested redbud trees, as they are hearty trees that are similar, native, and smaller than dogwoods. Harbour Square was very supportive of reestablishing portions of the original tree grid and reiterated that redbuds would be a good replacement species.

DC SHPO further suggested the use of educational signage with photos of the original grid of trees in lieu of replanting all or a portion of the grid of trees as another potential alternative to respect the original character and intention of Kiley's design. Additionally, the group discussed concerns about the "over planting" of trees in a temporary basis on a site that is intended to be redeveloped eventually as the site for a future museum or commemorative work. It was agreed that temporary improvements to the Banneker Park area should not preclude or reduce the likelihood that the site could be used as it is intended in the NCPC Memorials and Museums Master Plan.

DC SHPO stated that while Alternative 1 would require minor modifications to some of the contributing features of the park, such as the concrete retaining wall that supports the traffic circle to accommodate access to the stairway, Alternative 1 has the potential of a finding of No Adverse Effect. As the Section 106 process requires analyzing alternatives, which the project team has done, DC SHPO would support a conditional finding of No Adverse Effect, with landscaping and design details to be submitted once they are completed; however, if a greater level of detail can be achieved and analyzed within the EA and AoE Report, a finding of No Adverse Effect without conditions is possible.

Draft APE/Listed and Eligible Resources

The draft APE was presented to the consulting parties at the meeting. In response to the first agency meeting held on August 20, 2015, the APE was reduced. The current listed and eligible resources within the APE are: the Department of Housing and Urban Development Building, the East and West Potomac Parks Historic District, the Washington Marina, the Jefferson Middle School, the Lunch Room Building/Oyster Shucking Shed, the L'Enfant Promenade, and Banneker Park.

Planning Issues and Concerns

The project team has identified several potential issues or concerns that will likely require a more detailed analysis in the EA document and AoE Report under the Section 106 process. Issues and concerns presented at the meeting were as follows:

- Banneker Park is eligible for listing in the NRHP, so there is a potential for the proposed project to have adverse effects on the property.
- Construction of the temporary pedestrian connection would add new features into the Dan Kiley-designed landscape and the viewshed, particularly from the waterfront.
- Several historic properties or properties eligible for listing in the NRHP are located in the vicinity of Banneker Park that could be affected.

- The proposed stairway and ramp would result in an increase of impervious surface area and a project area greater than 5,000 square feet, triggering DOEE's Stormwater Management Regulations and requirement for at least 50% onsite stormwater retention.
- Vegetation (turf grass, sumac, and honeysuckle) would be removed to construct the connection and the ability for the site to infiltrate stormwater would be slightly reduced.
- Configuration of ramps and staircases would impact bicycle trail connections.
- Regarding stormwater management, the Energy Independence and Security Act (EISA) is an applicable regulation that would apply to this federal (NPS) site. EISA uses the 95th percentile storm event (1.7") for stormwater management.

Project Schedule

After the project schedule was presented to the consulting parties, CFA suggested that the design review and approvals process, including the DC Historic Preservation Review Board, NCPC, and CFA, should be added to the project schedule after the Finding of No Significant Impact in May 2016.

Action Items

During the consulting parties meeting, the following items were discussed but were not completely resolved or require further attention.

1. The project team will begin preparing the NEPA EA and AoE Report without further landscape design details; however, ZGF will research the original landscape design to provide a higher level of design for review.
2. NPS will attempt to locate Kiley's original design plans to determine the original tree grid, as this may help inform ZGF on what a sensitive and compatible design would be. The original design plans may also help ZGF to understand how the project may affect the existing retaining walls on the site.

Benjamin Banneker Park Connection

Section 106

Assessment of Effects Report

March 2016