

**National Park Service
U.S. Department of the Interior**



**National Mall and Memorial Parks
Peace Corps Commemorative Park Environmental Assessment
Washington, DC**



PEACE CORPS COMMEMORATIVE PARK

**ENVIRONMENTAL ASSESSMENT
JULY 2022**

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Peace Corps Commemorative Park Environmental Assessment

Table of Contents

| | |
|---|-----------|
| PURPOSE AND NEED | 1 |
| Introduction | 1 |
| Background and Project Area | 1 |
| Issues and Impact Topics Retained for Detailed Analysis | 3 |
| Issues and Impact Topics Dismissed from Detailed Analysis | 3 |
| ALTERNATIVES | 5 |
| Alternative A: No Action | 5 |
| Alternative B: Peace Corps Commemorative Park (NPS Preferred) | 5 |
| AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES | 7 |
| Archeological Resources | 7 |
| Visitor Use and Experience | 9 |
| CONSULTATION AND COORDINATION | 10 |
| LIST OF PREPARERS AND CONTRIBUTORS | 11 |
| REFERENCES | 13 |
| | |
| FIGURES | |
| Figure 1: PCC Park Project Site Location and Walking Distances | 2 |
| Figure 2: PCC Park Site Plan | 5 |
| Figure 3: Aerial View of Proposed PCC Park | 6 |
| Figure 4: APE and Proposed Site Plan with Boring Locations | 8 |
| | |
| APPENDIX A | |
| Section 106 Correspondence | |
| | |
| APPENDIX B | |
| National Capital Planning Commission Preliminary Plan Submittal | |

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PURPOSE AND NEED

INTRODUCTION

The National Park Service (NPS) and the Peace Corps Commemorative Foundation (Foundation), in cooperation with the National Capital Planning Commission (NCPC), propose to establish a permanent Peace Corps Commemorative Park (PCC Park) on parkland (Reservation 727) managed by the National Mall and Memorial Parks near the U.S. Capitol at a site bound by Louisiana Avenue NW and 1st and C Streets NW in Washington, DC (all streets referenced in this document are NW unless otherwise specified). Public Law (P.L.) 113-78 authorizes the Foundation to establish a commemorative work on Federal land in the District of Columbia and its environs to commemorate the mission of the Peace Corps and the ideals on which the Peace Corps was founded.

This Environmental Assessment (EA) describes two alternatives for the PCC Park, including one action alternative and the no action alternative, and analyzes the environmental consequences of implementing each alternative. This document has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA); regulations of the Council for Environmental Quality (40 CFR 1500-1508); NPS Director's Order (DO) #12: Conservation Planning, Environmental Impact Analysis, and Decision-Making; the NPS NEPA Handbook (NPS 2015); and NCPC's NEPA Regulations (NCPC 2017). In conjunction with this EA, the project is undergoing a review of potential effects on historic resources in compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. This document is being used for compliance with NEPA of 1969, as amended.

Purpose

The purpose of the PCC Park is to commemorate the mission of the Peace Corps and the ideals on which the Peace Corps was founded.

Need

The planning, design, and construction of the PCC Park is being undertaken to carry out P.L. 113-78 to address the current lack of a formal place to commemorate the mission of the Peace Corps and the ideals on which the Peace Corps was founded in the District of Columbia or its environs.

BACKGROUND AND PROJECT AREA

After the congressional authorization of the development of the PCC Park in 2014, the Foundation conducted a site selection study to identify an appropriate location for the placement of a new memorial. The initial review considered approximately 25 potential sites. After presentations to the National Capital Memorial Advisory Commission (NCMAC), the U.S. Commission of Fine Arts (CFA), and NCPC, and a site selection scoping period to solicit comments from the public, the Foundation and the NPS identified a preferred location. The project site, an approximately 0.15-acre area located at the intersection of Louisiana Avenue and C and 1st Streets, emerged as the preferred location. The site is owned by the United States, administered by the NPS and managed by National Mall and Memorial Parks.

The project site, Reservation 727, is located adjacent to the Robert A. Taft Memorial, part of the U.S. Capitol Grounds. Commercial buildings lie to the north and west of the site, while the U.S. Capitol lies two blocks to the southeast. The site is a grass panel with a small number of trees bordered on all sides by sidewalks and street trees. Nearby visitor attractions include the Memorial to Victims of Ukrainian Famine-Genocide (Holodomor Memorial) to the north, Japanese American Memorial to Patriotism

ISSUES AND IMPACT TOPICS RETAINED FOR DETAILED ANALYSIS

The NPS, participating agencies and stakeholders, and the public identified issues and impact topics for detailed analysis during the internal and public scoping processes. These issues and concerns are included in the impact topics that are discussed in the “Affected Environment and Environmental Consequences” section of this EA.

Potential for the project to impact archeological resources. The project’s construction and installation of a plaza, walkways, and landscape would disturb ground below-grade, thereby disturbing potential archeological resources. The project’s potential impacts are analyzed in detail under the Archeological Resources section in this EA.

Potential for the project to impact visitor use and experience. The project would replace the open grass panel with a commemorative work featuring sculptural seating, a plaza, and formalized circulation within the site. The project’s potential impacts are analyzed in detail under the Visitor Use and Experience section in this EA.

ISSUES AND IMPACT TOPICS DISMISSED FROM DETAILED ANALYSIS

Some issues and concerns identified during scoping were considered by the NPS but ultimately dismissed from detailed analysis because they were determined not central to the proposal nor of critical importance. This section will provide brief descriptions of the issues and concerns determined not to warrant further consideration, as well as a summary justification for the dismissal of each issue.

Potential for the project to impact historic buildings and structures. The proposed project could introduce or change contributing features of historic properties eligible for or in the National Register of Historic Places (NRHP). The L’Enfant Plan of the City of Washington encompasses the project site and is listed in the NRHP. Although Reservation 727 is considered a contributing element to the L’Enfant Plan and is adjacent to multiple contributing views and vistas, the project site would continue its current function and form with no intrusions to the views and vistas. Therefore, historic buildings and structures were dismissed from analysis.

Potential for the project to impact floodplains. Executive Order 11988, “Floodplain Management,” Executive Order 13690, “Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input,” and NPS DO #77-2: Floodplain Management define the NPS goal to maintain and preserve the beneficial values of floodplains. The limit of disturbance of the proposed action includes approximately 250 square (ft) within the 500-year floodplain. DO #77-2 requires NPS to take action to “reduce the risk of flood loss” (to capital resources), “minimize the impact of floods on human safety, health and welfare,” and maintain “natural and beneficial values served by floodplains.” Section 5.0 of DO #77-2 states that projects within the 500-year floodplain that are considered critical actions, such as irreplaceable record storage and museums, are subject to floodplain policies and procedures. The PCC Park would not result in significant negative impacts on human health and safety, federal capital resources, or natural beneficial floodplain values. Furthermore, the project does not include a critical action, and it was therefore determined that a Floodplain Statement of Findings (FSOF) was not necessary for the action. As a result, this topic was dismissed from further analysis in this EA.

Vegetation, Wildlife, and Special Status Species. The NPS policy is to protect the natural abundance and diversity of all naturally occurring communities. The 2006 NPS Management Policies (NPS 2006), NPS DO #77: Natural Resources Management, and other NPS and park policies, provide general direction for the protection of vegetation and wildlife. The project area for the construction and

establishment of the new PCC Park will require the removal and replacement of seven of the eight existing trees within the project site; the remaining tree would be an existing northern red oak along Louisiana Avenue. Louisiana Avenue would receive three replacement street trees. Within the interior of the site, approximately six oak trees, three gum trees, one elm tree, and approximately nine flowering trees would be installed. An estimated 5,800 square ft of turf would be removed. In accordance with Section 7 of the Endangered Species Act, the NPS consulted with the U.S. Fish and Wildlife Service to determine the potential for federally listed protected species to be present at the project site. This consultation indicated the potential for the federally threatened Northern Long-Eared Bat (*Myotis septentrionalis*). However, because the project would have tree clearing of less than 15 acres (the level required for additional consultation for the Northern Long-Eared Bat), this topic was dismissed from analysis.

ALTERNATIVES

This EA has been prepared in accordance with NEPA of 1969, as amended, and implementing regulations, 40 Code of Federal Regulations (CFR) Parts 1500-1508, NPS DO #12: Conservation Planning, Environmental Impact Analysis, and Decision-making, and the accompanying NEPA Handbook. Compliance with Section 106 of the NHPA of 1966, as amended, is being conducted concurrently with the NEPA process.

ALTERNATIVE A: NO ACTION

Under the no action alternative, the PCC Park would not be established. The project site would remain in its current configuration. Trees along Louisiana Avenue and 1st and C Streets would remain, as would the existing turf and multiple trees within the site.

ALTERNATIVE B: PEACE CORPS COMMEMORATIVE PARK (NPS PREFERRED)

The proposed project would establish a new PCC Park, as authorized in P.L. 113-78, at Reservation 727 bound by Louisiana Avenue and 1st and C Streets. The approximately 0.15-acre memorial would include a central plaza inlaid with a world map, edged by three benches, with entry provided by three walkways from the sidewalks (see **Figure 2** and **Figure 3**). The curved benches, each shaped to resemble a different open hand, would be between approximately 2 to 3.5 ft in height and approximately 32 ft in length. Visitors would access the plaza via three pathways leading from approximately mid-block Louisiana Avenue, the intersection of 1st and C Streets, and mid-block C Street. Of the eight existing trees within the project site, seven of which would be replaced; approximately 22 new and replacement trees and new vegetated groundcover would be installed. The site would also include an approximately 1,600-square foot bioretention area to address stormwater runoff and new night-sky friendly lighting.

Figure 2: PCC Park Site Plan



Figure 3: Aerial View of Proposed PCC Park



AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This chapter describes current environmental conditions in and around the project area. The discussion is focused on resources that could potentially be affected by the implementation of the proposed project and provides a baseline for understanding the current condition of the resources. This section also includes an analysis of the environmental consequences, or “impacts,” of the No Action and Action Alternatives.

The Affected Environment description is followed by the Environmental Consequences analysis for each resource topic. The resource topics analyzed here correspond to the planning issues and concerns described in the Purpose and Need section of this EA.

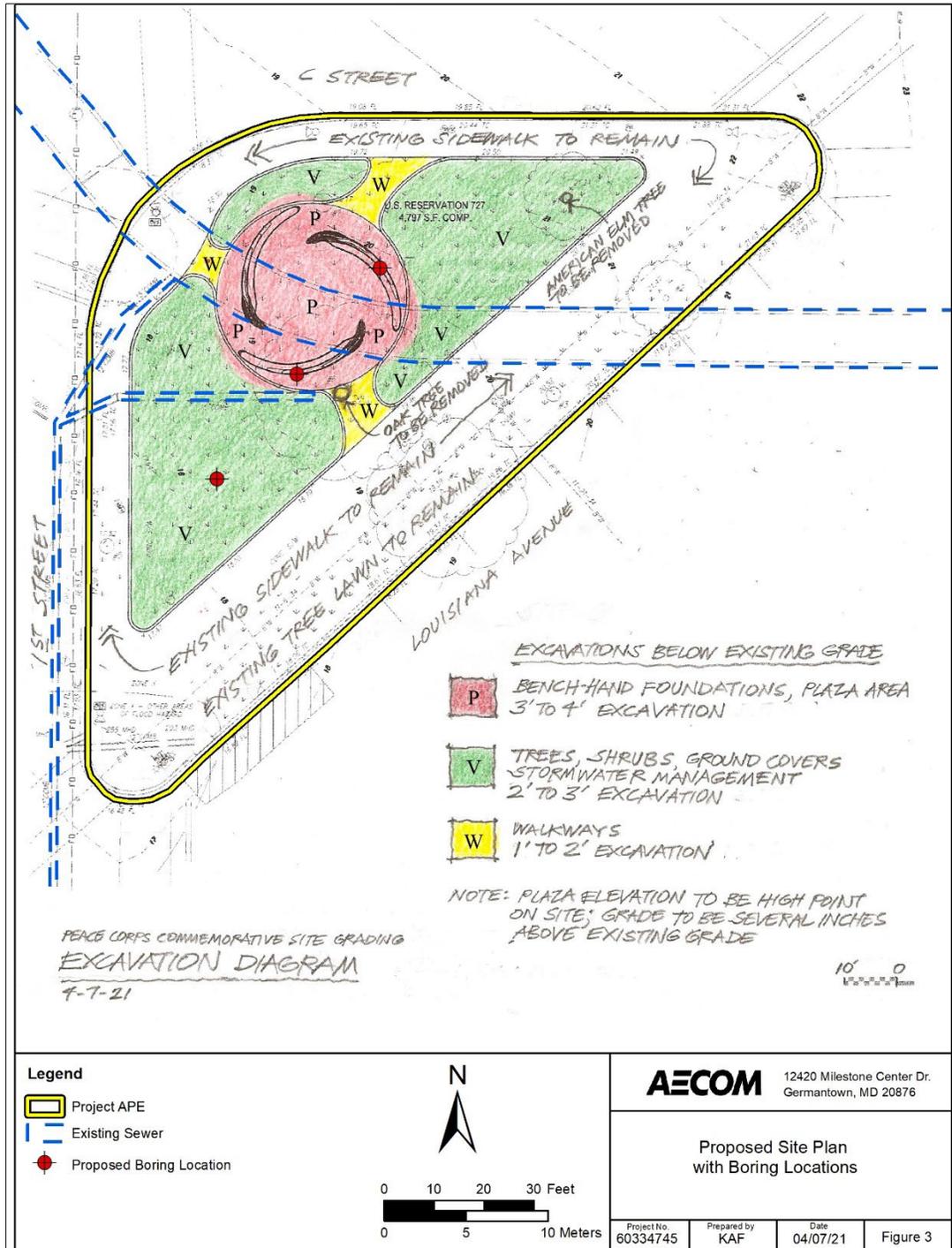
In accordance with the Council on Environmental Quality (CEQ) regulations, the environmental consequences analysis includes the direct, indirect, and cumulative impacts potentially resulting from the proposed alternatives (40 CFR 1502.16). The intensity of the impacts is assessed in the context of the park’s purpose and significance, and any resource-specific context that may be applicable (40 CFR 1508.27). Where appropriate, mitigating measures for adverse impacts are described and their effect on the severity of the impact is noted. The methods used to assess impacts vary depending on the resource being considered but are generally based on a review of pertinent literature and park studies, information provided by on-site experts and other agencies, professional judgment, and park staff knowledge and insight.

ARCHEOLOGICAL RESOURCES

Affected Environment

This section of the EA addresses archeological resources within the Area of Potential Effect (APE), which is the project site (see **Figure 4**). Correspondence with the District of Columbia Historic Preservation Office (DC SHPO) indicates the location is sensitive for historic and prehistoric archaeological resources. The reservation is adjacent to the original course of Tiber Creek and appears to have been filled to raise the elevation. Historic map research documents the change in landscape surrounding the project area from the late eighteenth century to present day. [Note: historic maps often incorporate spatial inaccuracies that affect the precision of georeferencing; therefore, the APE’s location relative to features illustrated on historic maps is approximate.] Maps from 1792 through 1903 depict the site within a roadway and/or part of Lot 633 as identified in the L’Enfant Plan for the City of Washington (Foundation 2021). Development first appears on the 1903 Sanborn map, which shows buildings present on the southeast boundary of the APE, along with a median along the north boundary of the APE. The developments shown on these two Sanborn maps would have occurred after infilling of the creek and vicinity. The 1945 USGS topographic quadrangle map shows the modern configuration of Square 633 and Louisiana Avenue, however, no buildings are depicted on the map. The project area, which encompasses approximately 0.15 acres, was acquired by NPS from Washington, DC, at some point in the mid- to late-twentieth century and is part of the National Mall and Memorial Parks. Potentially eligible archeological resources may be present at the site.

Figure 4: APE and Proposed Site Plan with Boring Locations



Impacts of Alternative A: No Action

Under the No Action Alternative, no ground-disturbing activities would occur at the site. Therefore, Alternative A would result in no impacts on archeological resources.

Impacts of Alternative B: Action Alternative

Alternative B would install a plaza, seating, and pathways at the project site, along with the replacement of seven trees and the addition of 15 new trees, ground cover vegetation, and bioretention areas. Combined, these elements are anticipated to require disturbance of the site up to a depth of 4 ft. Analysis of historic maps and topographical information indicates the project site has been infilled to raise the elevation 5 to 11 ft above the original elevation. Given the anticipated limit of disturbance is a maximum of 5 ft, the cut-and-fill analysis suggested that the project would not disturb potentially deeply buried (5 ft or deeper) archeological resources.

The Foundation and the NPS propose to conduct additional site investigations through archeological monitoring and geoarcheological analysis of geotechnical borings for the proposed PCC Park. The site investigations would provide information for potential for the subject property to contain significant archeological resources. If the site investigations indicate the potential for such resources, the Foundation and the NPS would prepare a Phase IB archeological survey. Therefore, Alternative B may result in detectable adverse impacts on archeological resources.

VISITOR USE AND EXPERIENCE

Affected Environment

The existing site is used for passive recreation by visitors. Due to its small size and location surrounded by roadways, the open space is primarily used as a link for pedestrians. The sidewalks comprise a pedestrian corridor along the adjacent roadways, which serve visitors to, and residents of, the vicinity. Visitors can access the site at the signalized southern, northwestern, and northeastern intersections with Louisiana Avenue and 1st and C Streets. Sidewalks provide access to the nearby U.S. Capitol Grounds, Japanese American Memorial to Patriotism During World War II, Memorial to Victims of Ukrainian Famine-Genocide (Holodomor Memorial), Union Station, and adjacent mixed-use developments. Because the nearby visitor attractions and development are established, pedestrian use of the site is stable.

Impacts of Alternative A: No Action

Alternative A would not change recreation activities or circulation within the project area. No impacts would occur to visitor use and experience under Alternative A.

Impacts of Alternative B: Action Alternative

Alternative B would replace the approximately 0.15-acre area encompassing turf and trees with a new memorial, including a plaza, seating, additional trees, and vegetative ground cover. Three new paths to the new memorial would connect from the Louisiana Avenue and 1st and C Streets sidewalks. The construction of these elements mentioned above would temporarily close areas of the park to visitors.

New pathways leading to existing sidewalks would not noticeably alter circulation patterns around the perimeter of the site. Within the site, the new paths to the memorial would formalize circulation. Passive recreation would continue and pedestrians would continue to receive shade from trees within the project site. It is anticipated that the improvements associated with the PCC Park would attract more visitor interest to the site, which would increase the use of the site. Therefore, Alternative B would not result in adverse impacts on visitor use and experience.

CONSULTATION AND COORDINATION

The NPS involved the public during the NEPA process to provide an opportunity for the public to comment on the proposed project. Consultation and coordination with federal and District of Columbia agencies and other interested parties was also conducted to refine the alternatives and identify issues and/or concerns related to park resources. This section provides a brief summary of the public involvement and agency consultation and coordination that occurred during planning.

- The NPS held two scoping meetings and 30-day public comment periods related to the PCC Park: one period for site selection (between October 11 and November 11, 2014) and one for the design (between January 13 and February 13, 2015). The public, agencies, and interested parties were invited to submit comments.
- The NPS initiated consultation with the DC SHPO on October 9, 2014.
- Consultation initiation will be sent to the Delaware Nation, Monacan Indian Nation, Pamunkey Indian Tribe, Upper Mattaponi Indian Tribe, Rappahannock Tribe, Nansemond Indian Nation, Chickahominy Indian Tribe, Chickahominy Tribe Eastern Division, Monacan Indian Nation, Catawba Indian Nation, Delaware Nation, Absentee Shawnee Tribe of Indians of Oklahoma, and Shawnee Tribe.
- NCMAC reviewed the site selection study and design in May 2014. The public was offered the opportunity to comment during the meeting.
- CFA reviewed the project's site selection and design seven times between November 2014 and November 2021. During each of these meetings, the public was offered the opportunity to comment.
- NCPC reviewed the project's site selection and design in December 2014 and May 2019, respectively. During each of these meetings, the public was offered the opportunity to comment.
- The NPS held one Section 106 consulting parties meeting on April 15, 2019, primarily focused on the proposed pergola and its potential adverse effects, most notably on views. This proposed element has since been removed from the design.
- The NPS and the Foundation have submitted preliminary archeology analysis and a proposed work plan to monitor geotechnical investigations at the site.

LIST OF PREPARERS AND CONTRIBUTORS

NPS NATIONAL MALL AND MEMORIAL PARKS

Catherine Dewey, Chief of Resource Management
Caridad de la Vega, Cultural Resources Program Manager
April Newman, Environmental Coordinator

NPS NATIONAL CAPITAL AREA

Tammy Stidham, Deputy Associate Regional Director – Lands and Planning
Joel Gorder, Regional Environmental Coordinator
Allison Young, Regional Section 106 Coordinator
Sophie Kelly, Memorials Program Manager
Laurel Hammig, Acting Memorials Program Manager

AECOM

Alan Harwood, Project Director
Claire Sale, Project Manager
Lauren Tuttle, Environmental Planner

REFERENCES

- National Capital Planning Commission. 2017. *National Capital Planning Commission National Environmental Policy Act Regulations*. Available: https://www.ncpc.gov/docs/actions/2017September/Final_NEPA_Regulations_7744_Sept2017.pdf. Accessed May 2022.
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- Peace Corps Commemorative Foundation. 2021. *Work Plan- Archeological Monitoring and Geoarchaeological Analysis of Geotechnical Borings for the Peace Corps Memorial*. Washington, DC.

APPENDIX A: Section 106 Correspondence

Appendix A includes the Section 106 correspondence for the Peace Corps Commemorative Park.



IN REPLY
REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

1.B (NCR-LPD)

October 9, 2014

Mr. David Maloney
District of Columbia Historic Preservation Officer
District of Columbia Historic Preservation Office
1100 4th Street S.W., Suite E650
Washington, D.C. 20024

Subject: Peace Corps Commemoration - Section 106 Consultation

Dear Mr. Maloney:

The Peace Corps Commemorative Foundation (PCCF), per the authorization provided by Public Law 113-78, approved January 24, 2014 (122 Stat. 647), proposes to establish a permanent memorial commemorating the creation of the Peace Corps and the ideals on which the Peace Corps was founded. The PCCF, in coordination with the National Park Service (NPS), has identified four:

- NCPC Site 46 – bounded by Rock Creek Park, Pennsylvania Avenue, 26th & M Streets, N.W., at the eastern edge of historic Georgetown
- NCPC Site 44-1 – two triangles flanking and bounded by Pennsylvania Avenue between H, 18th & 19th Streets, N.W., north of The World Bank
- NCPC Site 44- 2 - straddling Pennsylvania Avenue between H, 18th & 19th Streets, N.W.
- NCPC Site 25 – bounded by Louisiana Avenue, 1st and C Streets, N.W.

The NPS would like to formally initiate consultation for this undertaking with the District of Columbia Historic Preservation Office, in accordance with 36CFR800.3 of Section 106 of the National Historic Preservation Act.

The NPS will develop an Environmental Assessment (EA) for this project. We plan to consult with the public per 800.3(e) in public meetings and through our Planning, Environment, and Public Comment website (www.parkplanning.nps.gov). At this early stage, we are unable to propose either an area of potential effect (APE) or to make any determination of effect. Although we plan to coordinate the Section 106 and NEPA processes to the greatest extent possible and to use the NEPA public scoping process to fulfill the requirement to take the views of the public into account, we do not intend to utilize the regulatory path of “substituting” the EA for Section 106.

The NPS will hold a public scoping meeting for this commemorative project on Thursday, October 23, 2014, from 6:30 to 8:00 p.m., at the District Architecture Center, located at 421 7th Street, N.W., in Washington, D.C. – and would be pleased to have you or a member of your staff attend and furnish comments.

Thank you for your assistance on this project. If you have any questions, please do not hesitate to contact me at (202) 619-7025 or via email pmay@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter May", written in a cursive style.

Peter May
Associate Regional Director
Lands, Planning, and Design

Enclosed: Figures depicting locations being evaluated

cc:

Carton Hart, National Capital Planning Commission
Jennifer Hirsch, National Capital Planning Commission
Katie Harris, Advisory Council on Historic Preservation

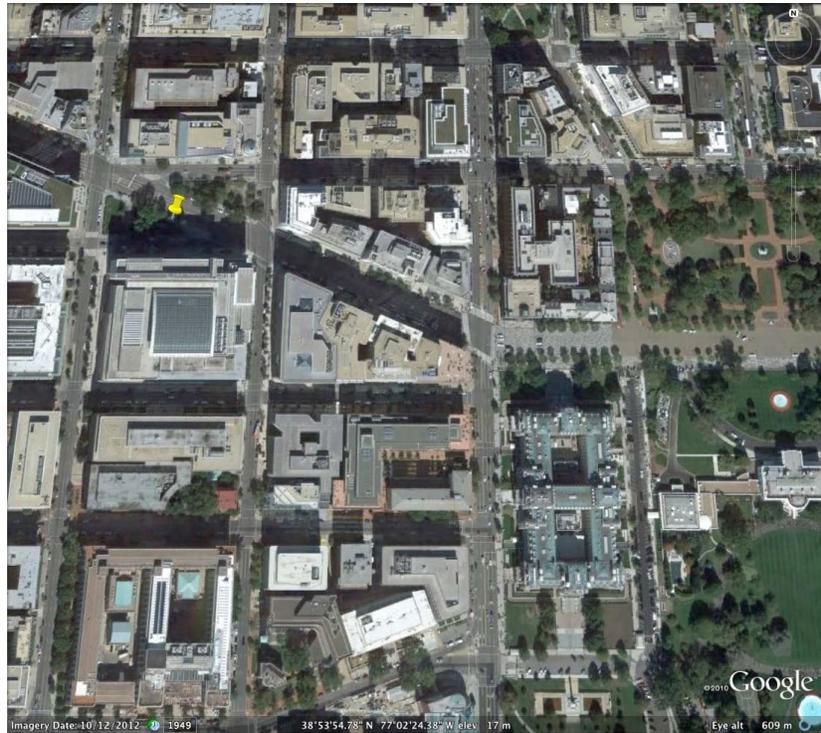
NCPC Site 46 – bounded by Rock Creek Park, Pennsylvania Avenue, 26th & M Streets, NW, at the eastern edge of historic Georgetown



NCPC Site 46 – bounded by Rock Creek Park, Pennsylvania Avenue, 26th & M Streets, NW



NCPC Site 44 – two triangles flanking and bounded by Pennsylvania Avenue between H, 18th & 19th Streets, NW, north of the The World Bank



NCPC Site 44 straddling Pennsylvania Avenue between H, 18th & 19th Streets, NW



NPC Site 25 – bounded by Louisiana Avenue, 1st and C Streets, NW



NCPC Site 25 – bounded by Louisiana Avenue, 1st and C Streets, NW





United States Department of the Interior

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

IN REPLY
REFER TO:

March 25, 2019

Mr. David Maloney
State Historic Preservation Officer
District of Columbia, Office of Planning
1100 4th Street SW, Suite 650 East
Washington, D.C. 20024

Subject: Section 106 Consultation for the Peace Corps Commemorative

Dear Mr. Maloney:

The Peace Corps Commemorative Foundation (PCCF), in cooperation with the National Park Service (NPS) wishes to formally re-initiate consultation with the District of Columbia Historic Preservation Office, in accordance with 36 CFR 800.3 of Section 106 of the National Historic Preservation Act of 1966, as amended, regarding the establishment of the Peace Corps Commemorative. The PCCF proposes to commemorate the enduring historic significance of the Peace Corps' 1961 founding, and the fundamental ideals and values that the Peace Corps' historic founding and Peace Corps service embody.

On October 9, 2014, the NPS wrote to formally initiate consultation with your office on this project. At the time, the PCCF, in coordination with the NPS, had identified four sites for consideration as the site for the Peace Corps Commemorative. During the site selection public scoping process in the fall of 2014, the PCCF and NPS received public comments regarding the four sites. The PCCF and NPS subsequently selected a parcel bound by 1st and C Streets NW and Louisiana Avenue NW as the preferred site for the commemorative. The site is located adjacent to the Robert A. Taft Memorial and U.S. Capitol Grounds.

In accordance with the National Environmental Policy Act (NEPA), the NPS will prepare an Environmental Assessment (EA) that will address this project. The NPS intends to coordinate consultation and NEPA review per Advisory Council on Historic Preservation (ACHP) regulations (36 CFR 800.8) and to consult the public per 36 CFA 800.3(e) in public meetings and through our Planning, Environment, and Public Comment (PEPC) website (<https://parkplanning.nps.gov/>). It is anticipated that these outreach efforts will accommodate both NEPA and the Section 106 processes, although NEPA and the Section 106 processes are on two separate, but parallel tracks.

The proposed Area of Potential Effect is shown in the attached map. However, at this early stage, we are unable to make any determination of effect. The NPS is seeking ways to avoid and minimize the potential for adverse effects on historic properties. Once determined, the NPS will prepare a formal Assessment of Effects for the project.

We look forward to consulting with you on this project. If you have any questions, please do not hesitate to contact Catherine Dewey, Chief of Resource Management for National Mall and Memorial Parks at 202-245-4711 or via email at catherine_dewey@nps.gov.

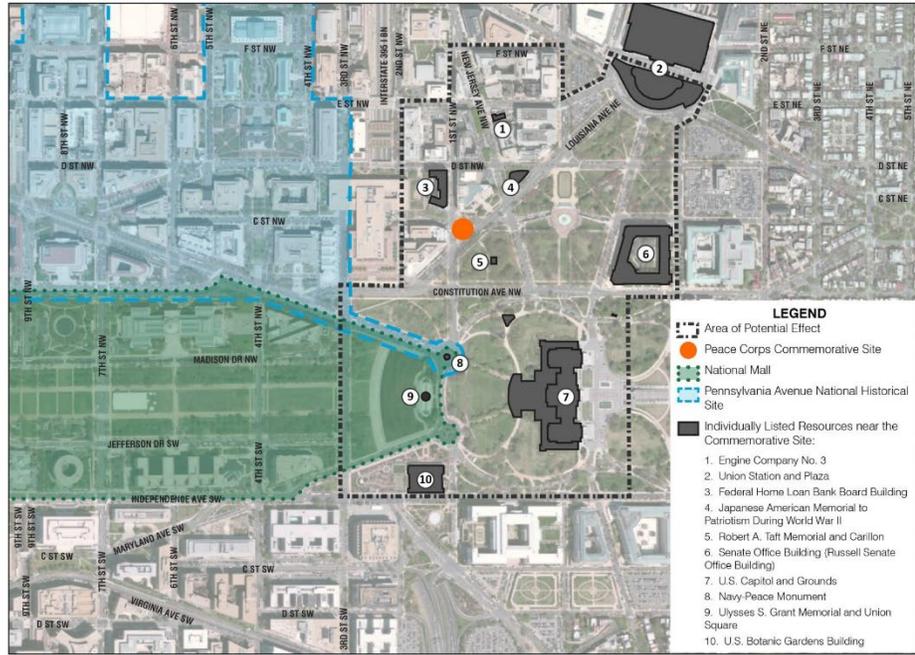
Sincerely,



Jeffery P. Reinbold
Acting Superintendent

Enclosure: Proposed Area of Potential Effect

Proposed Area of Potential Effect



Source: Esri, DigitalGlobe, GeoEye, I-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, DC GIS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

GOVERNMENT OF THE DISTRICT OF COLUMBIA
STATE HISTORIC PRESERVATION OFFICER



May 2, 2018

Mr. Jeffery P. Reinbold
Acting Superintendent, National Mall and Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, DC 20024-2000

RE: Re-initiation of Section 106 Consultation for the Peace Corps Commemorative (Peace Corps Memorial)

Dear Mr. Reinbold:

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

Since consultation was first initiated in 2014, the NPS has selected the site bounded by Louisiana Avenue, 1st and C Streets, NW (NCPC Site 25) and prepared the attached, draft Area of Potential Effects (APE). The NPS also hosted an agency-review meeting in late 2018 and a consulting parties meeting on April 15, 2019.

Based upon our participation in the meetings, we concur that the proposed APE should be adequate to identify any effects that the memorial may have on historic properties. We also point out that even though many of the "heritage resources" (e.g. the U.S. Capitol and Grounds etc.) within the APE are exempted from the requirements of the National Historic Preservation Act, the memorial should obviously be designed to respect the surrounding context. And since the memorial site has not been previously surveyed but has archaeological potential, phased archaeological investigations are warranted.

With regard to the current concept, we echo some of the comments that were expressed in the consulting parties' meeting – specifically that the vertical elements on the north and west sides of the triangular site should be less "wall-like" and what some may characterize as "menacing."

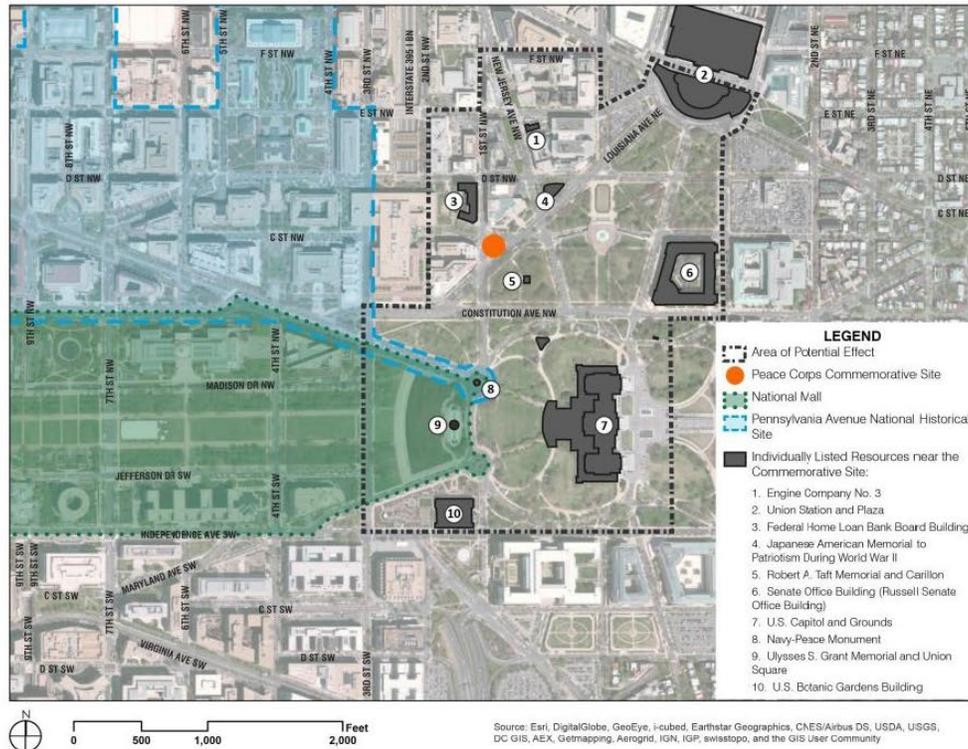
We look forward to consulting with the NPS and others to complete the Section 106 review of this undertaking. If you should have any questions or comments regarding any of these matters in the meantime, please contact me at andrew.lewis@dc.gov or 202-442-8841. Questions or comments relating to archaeology should be directed to Ruth Troccoli at ruth.troccoli@dc.gov or 202-442-8836. Thank you for providing this additional opportunity to review and comment.

Sincerely,

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

19-0340 (revision 14-398)

PEACE CORPS MEMORIAL AREA OF POTENTIAL EFFECT



[EXTERNAL] RE: Peace Corps Memorial Status & Arch Investigations

Troccoli, Ruth (OP) <Ruth.Troccoli@dc.gov>

Wed 9/30/2020 2:23 PM

To: de la Vega, Caridad <caridad_de_la_vega@nps.gov>

Cc: Lewis, Andrew (OP) <andrew.lewis@dc.gov>; Dewey, Catherine <Catherine_Dewey@nps.gov>; Ames, Christine (OP) <christine.ames@dc.gov>

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Cary-

Hope you are well. I refreshed my memory on our assessment of archaeological potential for the subject property described in our 2019 letter, Site 25, Reservation 727, originally part of Square 633. The evaluation has not changed.

In summary, the location is sensitive for historic and prehistoric archaeological resources. The reservation is adjacent to the original course of Tiber Creek and appears to have been filled to raise the elevation. There may be NRHP-eligible archaeological resources present. We recommend phased archaeological investigations that start with GIS cut-and-fill (elevation change) analysis and geoarchaeological evaluation to develop the Phase I identification survey work plan. It is likely that the presence of fill will necessitate mechanical testing (e.g., Gradall, backhoe, etc.). If resources are identified then SHPO consultation to determine whether Phase II NRHP-evaluation survey is needed and/or if the identified resources can be avoided, and/or if any treatments are required such as Phase III data recovery or other mitigation of adverse effects.

All of that is standard operating procedures for archaeological investigations in the District. This location is especially interesting because it was part of the original downtown corridor between the White House and the Capitol. It is a small parcel and should be straightforward project.

We look forward to continued consultation on this important project.

Cheers-

Ruth

Re: HPO 19-0360



Ruth Troccoli, Ph.D. • District Archaeologist
DC Historic Preservation Office, Office of Planning
1100 4th Street SW, Suite E650 • Washington, DC 20024
202.442.8836

ruth.troccoli@dc.gov

planning.dc.gov/page/archaeology-district-columbia

**Telework daily through October

10/1/2020

Mail - de la Vega, Caridad - Outlook

From: de la Vega, Caridad <caridad_de_la_vega@nps.gov>
Sent: Wednesday, September 30, 2020 9:53 AM
To: Trocolli, Ruth (OP) <Ruth.Trocolli@dc.gov>
Cc: Lewis, Andrew (OP) <andrew.lewis@dc.gov>; Dewey, Catherine <Catherine_Dewey@nps.gov>
Subject: Peace Corps Memorial Status & Arch Investigations

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Dear Ruth,

As you are aware, National Mall and Memorial Parks is currently in the planning phase for a new memorial on Reservation 727, the Peace Corps Memorial. On September 17, the Commission of Fine Arts (CFA) approved a revised concept for the memorial (see attached). Since the April 2019 consulting parties meeting the design has evolved to eliminate the glass and metal canopy and instead incorporate a tree canopy, and expanded the number of benches to three instead of two.

In determining the next steps in the Section 106 process for the Peace Corps Memorial we are following-up on your May 2018 consultation letter recommending a phased archaeological investigation. Does this recommendation still stand?

Cary

Caridad de la Vega
Cultural Resource Program Manager
[National Mall and Memorial Parks](#)
National Park Service
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Office (202) 245-4693 | Cell (202) 740-8377
caridad_de_la_vega@nps.gov
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From: [Lewis, Andrew \(OP\)](#)
To: [de la Vega, Caridad](#); [Troccoli, Ruth \(OP\)](#)
Cc: [Dewey, Catherine](#); [Ames, Christine \(OP\)](#); [Kelly, Sophia E](#)
Subject: RE: [EXTERNAL] RE: Peace Corps Memorial Status & Arch Investigations
Date: Monday, October 5, 2020 2:28:21 PM
Attachments: [image004.png](#)
[image005.png](#)
[image001.png](#)

Hello Cary:

Thanks for sharing the revised concept. That is significantly changed from the earlier proposal! The lifelike arms are a little unsettling but, from a historic preservation standpoint, the trees are less likely to have an adverse effect. We look forward to receiving a final determination of effect and completing the Section 106 review along with the NCPC review and whatever is being done to address the potential for archaeology.

Thanks again,



C. Andrew Lewis • Senior Historic Preservation Specialist
DC Historic Preservation Office, DC Office of Planning
1100 4th Street SW, Suite E650 • Washington, DC 20024
202-442-8841
andrew.lewis@dc.gov
<http://planning.dc.gov/historicpreservation>

From: de la Vega, Caridad <caridad_de_la_vega@nps.gov>
Sent: Monday, October 5, 2020 1:59 PM
To: Lewis, Andrew (OP) <andrew.lewis@dc.gov>; Troccoli, Ruth (OP) <Ruth.Troccoli@dc.gov>
Cc: Dewey, Catherine <Catherine_Dewey@nps.gov>; Ames, Christine (OP) <christine.ames@dc.gov>; Kelly, Sophia E <Sophia_Kelly@nps.gov>
Subject: Re: [EXTERNAL] RE: Peace Corps Memorial Status & Arch Investigations

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Hi Ruth,

Attached is the latest design concept from the September 2020 CFA meeting. Page 5 describes the revised design concept. I assumed you already had this information, so apologies for not sharing this in my previous message.

My understanding is that the revised concept will be presented to NCPC next. Please reach out if you have further questions or concerns.

Cary

Caridad de la Vega
Cultural Resource Program Manager
[National Mall and Memorial Parks](#)
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From: Lewis, Andrew (OP) <andrew.lewis@dc.gov>
Sent: Monday, October 5, 2020 1:18 PM
To: Troccoli, Ruth (OP) <Ruth.Troccoli@dc.gov>; de la Vega, Caridad <caridad_de_la_vega@nps.gov>
Cc: Dewey, Catherine <Catherine_Dewey@nps.gov>; Ames, Christine (OP) <christine.ames@dc.gov>
Subject: [EXTERNAL] RE: Peace Corps Memorial Status & Arch Investigations

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Hello Cary:

Your email regarding archaeology and the letter from CFA led me to consult our files to determine the status of the Section 106 review process as it relates to the historic built environment. According to our files, we haven't received any formal submissions from the NPS since 2019. I recall some variations of the initial concepts being shared at a meeting many months to a year ago but we have not received an update on the concept for a very long time so we would appreciate one as soon as you have an opportunity.

Thank you,



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From: Troccoli, Ruth (OP) <Ruth.Troccoli@dc.gov>
Sent: Wednesday, September 30, 2020 2:22 PM
To: de la Vega, Caridad <caridad_de_la_vega@nps.gov>
Cc: Lewis, Andrew (OP) <andrew.lewis@dc.gov>; Dewey, Catherine <Catherine_Dewey@nps.gov>; Ames, Christine (OP) <christine.ames@dc.gov>
Subject: RE: Peace Corps Memorial Status & Arch Investigations

Hi Cary-

Hope you are well. I refreshed my memory on our assessment of archaeological potential for the subject property described in our 2019 letter, Site 25, Reservation 727, originally part of Square 633. The evaluation has not changed.

In summary, the location is sensitive for historic and prehistoric archaeological resources. The reservation is

adjacent to the original course of Tiber Creek and appears to have been filled to raise the elevation. There may be NRHP-eligible archaeological resources present. We recommend phased archaeological investigations that start with GIS cut-and-fill (elevation change) analysis and geoarchaeological evaluation to develop the Phase I identification survey work plan. It is likely that the presence of fill will necessitate mechanical testing (e.g., Gradall, backhoe, etc.). If resources are identified then SHPO consultation to determine whether Phase II NRHP-evaluation survey is needed and/or if the identified resources can be avoided, and/or if any treatments are required such as Phase III data recovery or other mitigation of adverse effects.

All of that is standard operating procedures for archaeological investigations in the District. This location is especially interesting because it was part of the original downtown corridor between the White House and the Capitol. It is a small parcel and should be straightforward project.

We look forward to continued consultation on this important project.

Cheers-

Ruth

Re: HPO 19-0360



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planning.dc.gov/page/archaeology-district-columbia

**Telework daily through October

From: de la Vega, Caridad <caridad_de_la_vega@nps.gov>
Sent: Wednesday, September 30, 2020 9:53 AM
To: Troccoli, Ruth (OP) <Ruth.Troccoli@dc.gov>
Cc: Lewis, Andrew (OP) <andrew.lewis@dc.gov>; Dewey, Catherine <Catherine_Dewey@nps.gov>
Subject: Peace Corps Memorial Status & Arch Investigations

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archaeological investigation. Does this recommendation still stand?

Cary

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