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## Categorical Exclusion Form

**Project:** Install Temporary Office Modular Unit at Park Headquarters

**PEPC Project Number:** 32387

**Project Description:**

The National Mall and Memorial Parks (NAMA) Headquarters requires additional office space to accommodate staff recently hired to manage new and on-going construction and rehabilitation projects, as well as future hires that will be required for implementation of the National Mall Plan. Existing facilities are currently at maximum capacity and unable to accommodate any increases in staff. In order to address NAMA's immediate needs, a temporary modular office unit will be installed in front of the NAMA Headquarters "Annex" building (i.e. the historic U.S. Engineer's Storehouse) at 900 Ohio Dr., SW, Washington DC. The 128-foot-by-32-foot modular office will be placed on existing lawn and will include vegetation planting (a new pecan tree, 15 dragon lady hollies, and 15 cherry laurel) to ensure adequate screening. The installation will require the relocation of one non-historic flag pole and the removal of one cottonwood tree that is currently in a state of decline. The existing parking lot will not be expanded and the presence of the temporary modular office is not expected to noticeably increase the number of motor vehicles coming to the area.

The modular office is intended to provide temporary office facilities and will be removed once permanent accommodations become available; NAMA and the National Capital Region are currently in the information gathering phase of a comprehensive planning study to examine the long-term facility needs for NAMA, the National Capital Regional Office, and the two U.S. Park Police facilities located in East Potomac Park. This planning effort will consider a range of alternatives including renovation/expansion of the existing facilities, construction of new facilities, consolidation of facilities, as well as the leasing of office space outside of the park on a temporary or permanent basis.

On August 3, 2010, NAMA announced its intention to seek a Categorical Exclusion from further National Environmental Policy Act review for this project because it involves construction of a minor structure in a previously disturbed or developed area (NPS DO 12, Section 3-4, C.18), and initiated a 30-day public comment period. One letter with substantive comments was received in opposition to the proposed project (see the National Coalition to Save Our Mall letter, dated August 16, 2010). The table below summarizes and expands upon the NAMA staff's responses to these comments. For the reasons described in the table, the NPS does not feel that the proposed project is controversial and, therefore, warrants this Categorical Exclusion.

<b>National Coalition to Save Our Mall Comments and Questions</b>	<b>NAMA Response</b>
The public should be involved in the consultation process.	The public was involved in the consultation process. NAMA staff sent stakeholders email notifications of the proposal on August 3, 2010, initiating the public comment period. Staff's response to the comment letter was posted publicly via PEPC, as were other relevant consultation documents, and the email notification was sent out that same day on September 2, 2010. Further, this document provides a more detailed response to comments.
The proposed office should be treated as a permanent structure, given the prevalence of other buildings that were meant to be temporary in nature but have ultimately been in place for long periods.	NAMA Staff disagrees with this suggestion because the modular unit is removable and any effects would be reversible. Staff further disagrees because the NAMA Superintendent and the Tourmobile headquarters, two of the examples cited as temporary structures still being used for their intended purpose in East Potomac Park, will be analyzed along with the Regional Headquarters and the Park Police facilities in the comprehensive administrative space planning study which will analyze alternatives for creating permanent facilities for NPS administrative space. Additionally, the Police Stables mentioned in the comment letter in West Potomac Park were the subject of a study which was performed at the request of Congress and determined that the current location, though originally meant to be temporary, was in fact the best permanent location for such a facility.
What other alternatives were evaluated, given visual impacts on East Potomac Park and the site's location within a floodplain?	<p>Although NEPA and NPS policy does not require the evaluation of alternatives for Categorical Exclusions, staff did consider multiple locations for the trailer in East Potomac Park and ultimately chose this location because it does not displace recreation, is located outside of the tidal zone, and is less visually intrusive from across the river than other locations. The modular office is compatible with the scale of existing facilities. In addition, the selected site is consistent with historic use of the area: the vicinity between the U.S. Engineer's Storehouse and Ohio Drive was used as a driveway and service area during the 20<sup>th</sup> century.</p> <p>Regarding the location within a floodplain, staff consulted with the NPS Water Resources Division in Ft. Collins, Colorado and specifically asked if the proposed modular office would be in conflict with the NPS implementing policies in regard to Executive</p>

	<p>Order 11988. NAMA staff was advised that that such a structure would not be in conflict to the Executive Order because it is temporary and removable. It will also be elevated to limit damage from potential flooding and to allow any flood waters pass under it without impediment. The footprint is currently lawn, and thus the project avoids riparian vegetation, with the exception of a single cottonwood tree, for which additional vegetation will be planted. Impacts to both the function and value of the floodplain will not be measurable. In addition, in the event of a flood event, staff working in the modular unit will follow NAMA Headquarters' existing evacuation procedures and operational continuity measures.</p>
<p>How does NPS justify building near the historic U.S. Engineers Storehouse, which is a contributing feature of the National Register character of East Potomac Park?</p>	<p>The site location protects the most significant views of the U.S. Engineer's Storehouse from the Channel and the Southwest Waterfront. From Ohio Drive, the modular office is set back away from the U.S. Engineer's Storehouse and will be screened from the road by new and existing vegetation. The National Register nomination for East Potomac Park lists as contributing views those that allow unimpeded views to and from distant monuments, the Potomac River and adjacent waterfront, and the low skyline of the city. The modular office will not impede these views. Views to and/or from the U.S. Engineer's Storehouse are not listed. The DC SHPO concurs with staff's determination that the temporary facility will not impact historic properties, including the National Register of Historic Places-listed U.S. Engineer's Storehouse.</p>
<p>The proposal "ignores" NPS's 1982 Development Plan for East Potomac Park and impacts federal and District long-range goals for East Potomac Park and the waterfront.</p>	<p>The proposal is not inconsistent with the 1982 plan, which acknowledges that the property at NAMA headquarters is required for facilities dedicated to the administration of the park. This plan did not anticipate the significant increase in visitor use at NAMA (from 1.6 million visitors in 1997 to 3.6 million in 2009), which demonstrate the need for increased staff and facilities (and will be addressed during the space planning project). Due to the relatively flat terrain, distance, and screening by the marina (see NCPC photograph taken from Maine Avenue, SW), as well as the 14<sup>th</sup> Street bridge complex, the trailer will be barely visible from the DC waterfront, and the trailer's presence will not impede waterfront development. Nor would it impede development on East Potomac Park as</p>

	imagined in NCPC's framework plan "Extending the Legacy."
This proposal contributes to a long-term adverse cumulative effect on the character of East Potomac Park, the vicinity of Jefferson Memorial, the Tidal Basin, and other parts of the National Mall.	Relative to the size of East Potomac Park (327 acres) and relatively small and clustered arrangement of the existing NAMA headquarters compound, the impacts of the new modular offices would be localized and negligible to the rest of East Potomac Park. The proposed offices will be set up within the already fenced in compound. Existing and new vegetation and the existing infrastructure within the compound serve to reduce the visual impacts of the modular office to the immediate vicinity on Ohio Drive and the Channel (which, as discussed above, are minimal). Thus, the trailer will have negligible effects on the character of East Potomac Park, and will have no effect on the Jefferson Memorial, Tidal Basin, and National Mall. Staff agrees that the long-term, comprehensive space planning will need to consider any cumulative effects of future, and permanent facilities.

#### Project Locations:

##### Location

County: NA

State: DC

District:

Section:

Geo. Marker:

Other:

#### Mitigation(s):

- The DC SHPO concurs with the NPS determination of "no adverse effect" because the proposed office modular unit will be temporary, located in a relatively remote corner of East Potomac Park, not highly visible, and will be screened with additional vegetation to avoid any adverse visual effects. However, this determination is conditioned upon the removal of the temporary office modular unit once the permanent NAMA Headquarters facilities are designed, approved and constructed.

Describe the category used to exclude action from further NEPA analysis and indicate the number of the category (see Section 3-4 of DO-12):

C.18 Construction of minor structures, including small improved parking lots, in previously disturbed or developed areas.

On the basis of the environmental impact information in the statutory compliance file, with which I am familiar, I am categorically excluding the described project from further NEPA analysis. No exceptional circumstances (e.g. all boxes in the ESF are marked "no") or conditions in Section 3-6 apply, and the action is fully described in Section 3-4 of DO-12.

Signature

Superintendent: Stephen Lorenz Date: 10/21/10

NPS Contact:

Sean King Date: 10/21/10