



UNITED STATES PARK POLICE STABLES REDEVELOPMENT AND SITE IMPROVEMENTS

Washington, DC

June 4, 2020

Finding of No Significant Impact

Pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), the Council on Environmental Quality Regulations (40 CFR, Parts 1500-1508), and the National Capital Planning Commission's Environmental Policies and Procedures, I have evaluated the preliminary and final site and building development plans for the United States Park Police (USPP) Stables Redevelopment and Site Improvements in Washington, DC, as shown on NCPC Map File No. 1.43(38.00)45116; and the U.S. Park Police Stables Redevelopment Environmental Assessment (EA) prepared by the National Park Service (NPS) along with the National Capital Planning Commission (NCPC) as a cooperating agency. I concur with the Finding of No Significant Impact (FONSI) prepared by NPS and signed on October 21, 2019. Based on the foregoing, I have determined that the selected Alternative B: Action Alternative with the Symmetrical Building Oriented Parallel to Ash Road and the Reflecting Pool Option, will not have a significant impact on the human environment.

Purpose and Need

The purpose of the proposed project is to redevelop the horse stable facilities essential to the USPP mission, as included in the approved National Mall Plan. The project is intended to improve horse living and stable conditions, provide adequate administrative space and storage, improve operational access, reduce vehicular and pedestrian conflicts, address drainage concerns, and engage the public through a limited education/interpretation program.

The project is needed to address the following concerns and ongoing issues affecting USPP's ability to carry out its mission:

- The appearance and quality of the existing facility is inconsistent with the character and quality of the National Mall identified in the National Mall Plan, and is directly visible from Ash Road and sensitive areas of the National Mall.
- The existing facility lacks adequate paddock space, stalls, and storage for horses and equipment.

- The existing storage facilities for food, bedding, hay, sawdust, and manure attract pests.
- Poor drainage and grading results in stormwater affecting manure and other storage areas.
- The existing interior office space and parking is insufficient.
- Existing access to the facility is insufficient for optimal operations, and creates safety hazards along Ash Road.
- The existing facilities are not energy-efficient or sustainable.

Proposed Action

The proposed action includes replacing the existing horse stables and office trailer and constructing a new building with horse stalls, an operations office, support service areas, and storage. The proposed building will also have a public visiting space with two public restrooms. Site improvements include construction of two public viewing paddocks, a training paddock, a parking lot, fencing, lighting, signage, and rain gardens. Vegetation will be preserved or removed and replaced in certain areas. Vehicular access to the site will be added from Independence Avenue and pedestrian access to the site will remain on Ash Road. A pedestrian social path to the east of the site will be formalized and provide a north-south connection between Ash Road and Independence Avenue.

Selected Alternative

Based on the analysis presented in the EA, Alternative B: Action Alternative is selected for implementation. The selected alternative will replace the four detached structures and office trailer with a single taller, larger, symmetrical stable building. The building will be oriented parallel to Ash Road and the Reflecting Pool. The building will accommodate 14 horse stalls; a quarantine stall; a show stall; a tack room; an operations office; a feed, tool, and outdoor storage area; and other features. An outdoor public visiting space centrally located on the north side of the building will include an educational component, but the project will not include a formal public engagement component. The public visiting space will connect to the tack room, show stall, and grooming stall. The public portion of the building will also house two public restrooms. The building will be approximately 24 feet tall and have a continuous pitched roof with five cupolas providing ventilation.

The single paddock will be replaced with four paddocks. Two paddocks, visible to the public from designed viewing areas, will be located between the north side of the building and Ash Road. One medical paddock will be located on the south side of the building out of public view. One private paddock, also out of public view, will be located to the west of the building.

The existing parking and loading area will be replaced with a new parking and loading area that accommodates additional employee parking spaces and trailer-parking spaces. A new vehicle entry driveway from Independence Avenue will provide access to the new parking and loading area for USPP, delivery, maintenance, and other official use vehicles. A supported turf entry

road from Ash Road will provide emergency vehicle access to the facility. The Action Alternative will also replace the existing social trail through Ash Woods with a designed path. No changes will occur to the existing water treatment plant.

A secure perimeter will surround the new building, paddocks, parking and loading area, and water treatment plant. The public paddocks will be enclosed by two wood post and rail fences located eight feet apart for the protection of the horses and the public. A five-foot tall paddock fence will face the horses and a four-foot public fence will face the National Mall. The remainder of the facility will be enclosed by a physical barrier combined with a partial or full visual barrier. Gates will be located at the Independence Avenue entry driveway and the entry road from Ash Road.

A buffer of vegetation will surround the facility and the Action Alternative will result in no net loss of trees on the project site. The Action Alternative will retain the existing water treatment plant in its current location. During the 12- to 18-month construction period for the Action Alternative, a portion of the John F. Kennedy (JFK) hockey fields to the north of the project site will likely be used as a staging area.

Other Alternatives Evaluated

The EA analyzed a No Action Alternative and three additional alternatives for the USPP Stables during scoping. These alternatives were ultimately dismissed from further consideration. A description of these concepts is provided in Appendix A of the EA.

Standard for Evaluation

Under NEPA, the Council on Environmental Quality (CEQ) regulations, and NCPC Environmental Policies and Procedures, an EA is sufficient and an Environmental Impact Statement need not be prepared if the EA supports the finding that the major federal action will not significantly affect the human environment. The EA for this project was prepared in accordance with this standard.

Potential Impacts

As documented in the EA, the selected alternative has the potential for adverse impacts on historic structures and visitor use and experience; however, the selected alternative can be implemented without significant adverse effects, as defined in 40 CFR §1508.27.

Implementing the selected alternative will result in detectable adverse impacts on historic structures, including direct, adverse impacts on the L'Enfant Plan and indirect, adverse impacts on the National Mall and East and West Potomac Parks Historic Districts; Washington Monument; Lincoln Memorial; Korean War Veterans Memorial; Martin Luther King, Jr. Memorial; District of Columbia War Memorial; and World War II Memorial. The addition of a new structure, trail, and vehicle entry driveway in West Potomac Park and the National Mall will

be visible in the park and from historic resources or their contributing resources. The new facility's design will minimize impacts on historic structures by using building materials that have an earth-toned color palette and are compatible with the color and texture of other buildings on the National Mall. The stables building will also be oriented parallel to Ash Road and the Reflecting Pool, reinforcing the spatial definition of the National Mall. The new facility will also have a symmetrical layout and incorporates design considerations such as roof configuration and height and overall massing of the building. The use of the JFK hockey fields as a construction staging area will have temporary adverse impacts on the L'Enfant Plan, National Mall and East and West Potomac Parks Historic Districts, Washington Monument, Lincoln Memorial, Korean War Veterans Memorial, District of Columbia War Memorial, and World War II Memorial. However, the impacts will be short-term and within a site-specific area of the JFK hockey fields. Following construction, construction materials and equipment will be removed from the JFK hockey fields, impacted grass will be re-vegetated, and recreational use of this portion of the fields could resume. Overall, changes to historic structures will be noticeable but will not result in their delisting from the National Register of Historic Places (NRHP) or their eligibility for NRHP listing.

Implementing the new vehicle entry driveway at Independence Avenue will also have detectable indirect, adverse impacts on the Tidal Basin Cultural Landscape. The driveway will add a break to the existing structure of the view corridor characterized by a sidewalk, vegetated strip, and vegetated site area at the intersection with West Basin Drive. The new intrusion of a driveway, curb cut, and apron will be visible, but would be similar in character to other curb cuts in the view corridor. The driveway will also be visible from the Martin Luther King, Jr. Memorial and American Elms lining Independence Avenue. Views from the memorial and trees to the facility would be partially filtered through the remaining and newly planted trees. The impact will lessen as the newly planted trees mature. The new facility's design will minimize impacts on cultural landscapes by using building materials that have an earth color palette and are compatible with the color and texture of other buildings on the National Mall. The selected alternative will also result in temporary adverse impacts on the Lincoln Memorial Grounds, Washington Monument Grounds, and the District of Columbia War Memorial Cultural Landscapes during construction; however, the impacts will be short-term and within a site-specific area of the JFK hockey fields. Following construction, construction materials and equipment will be removed, impacted grass will be re-vegetated, and recreational use of this portion of the fields could resume.

The selected alternative will implement several improvements throughout the project site and 100-year floodplain and will decrease the total impervious surface area at the project site. Although the project will be located within the 100-year floodplain, it does not include critical actions such as schools or hospitals. The redevelopment of the stables will also not alter the natural resources in the floodplain. Structures within the floodplain will incorporate elements of construction to increase flood resiliency and minimize flood damage, as contained in the National Flood Insurance Program Floodplain Management Criteria for Flood-Prone Areas (44 CFR 60.3). The project will adhere to the requirements of Executive Order 11988 and NPS Procedural Manual 77-2: Floodplain Management and all necessary federal and District permits

for projects occurring in the 100-year floodplain will be obtained. The project will also adhere to all applicable requirements set forth in the permits and develop an evacuation plan in the event of a flood.

Implementing the selected alternative will have beneficial impacts on visitor use and experience through the construction of new elements within that site that will create opportunities for the public to view and learn about the history and function of USPP Mounted Patrol, reduce pedestrian, bicycle and vehicle conflicts along Ash Road, and provide formal pedestrian access between Ash Road and Independence Avenue. These improvements will prohibit visitor use on a portion of the JFK hockey fields, including during large events such as the Presidential Inauguration, and could alter circulation along Ash Road during the construction phase, resulting in temporary noticeable adverse impacts on visitor use and experience; however, the impacts will be short-term and within a site-specific area of the JFK hockey fields and Ash Road.

Mitigation Measures

Historic Structures

The original facility that is being replaced was evaluated and determined not historic. The design and construction of the new facility will be compatible with the design of other buildings and facilities on the National Mall as well as and is consistent with the *Secretary of Interior's Standards for the Treatment of Historic Properties*. Design of the new facility will use building materials that have an earth-toned color palette and are compatible with the color and texture of other structures on the National Mall. The stables building will also be oriented parallel to Ash Road and the Reflecting Pool, reinforcing the spatial definition of the National Mall. Symmetrical layout, roof configuration and height, as well as the overall massing of the building were also used to carefully refine the design. After construction is complete, revegetation of the JFK hockey fields will be undertaken in a way that is consistent with the *Secretary of Interior's Standards for the Treatment of Historic Properties* and *National Mall and Memorial Parks (NAMA) Turf Plan*. Construction routes and methods will be planned to avoid damage to large trees and to minimize vegetation disturbance. Ash Road could be temporarily closed to allow construction access to the site, rerouting visitors to memorials and maintenance staff to the water treatment plant.

Cultural Landscapes

Design and construction of the new facility will be compatible with the documented cultural landscapes of the National Mall and West Potomac Park. Design, new construction efforts, and tree plantings will be consistent with the *Secretary of Interior's Standards for the Treatment of Historic Properties* and the *Guidelines for the Treatment of Cultural Landscapes*. The new facility's design will use building materials that have an earth color palette and are compatible with the color and texture of other buildings on the National Mall. After construction is complete, revegetation of the JFK hockey fields will be undertaken in a way that is consistent with the *NAMA Turf Plan*. Construction routes and methods will be planned to avoid damage to large trees and to minimize vegetation disturbance. Ash Road could be temporarily closed to allow

construction access to the site, rerouting visitors to memorials and maintenance staff to the water treatment plant.

Floodplains

Structures within the floodplain will incorporate elements of construction to increase flood resiliency and minimize flood damage, as contained in the National Flood Insurance Program Floodplain Management Criteria for Flood-Prone Areas (44 CFR 60.3). The project will also:

- Adhere to procedures set forth in Procedural Manual 77-2: Floodplain Management to eliminate or minimize impacts on the 100-year floodplain to the extent possible
- Develop an evacuation plan in event of a flood
- Obtain all necessary federal and District permits for projects occurring in the 100-year floodplain, and will adhere to applicable requirements set forth in the permits to avoid, mitigate, or otherwise minimize floodplain impacts
- Adhere to requirements of Executive Order 11988

Visitor Use and Experience

During construction, Ash Road could be temporarily closed to allow construction access to the site, rerouting visitors to the Korean Veterans War Memorial and maintenance staff to the water treatment plant. Following construction, construction materials and equipment will be removed, impacted grass will be re-vegetated according to the *NAMA Turf Management Plan*, and active recreation use of the portion of the JFK hockey fields closed during construction could resume.



Marcel Acosta
Executive Director



Date