


CONTENTS: SPECIFIC COMMENTS AND SUPPLEMENTAL RESPONSES

Cooperating Agencies

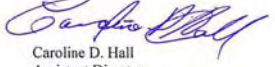
Letter 1. Advisory Council on Historic Preservation.....	30
Letter 2.1. Architect of the Capitol	32
Letter 2.2. Architect of the Capitol	33
Letter 3. District of Columbia Office of Planning.....	35
Letter 4. District of Columbia State Historic Preservation Officer	37
Letter 5.1. Federal Reserve Board.....	40
Letter 5.2. Federal Reserve Board.....	40
Letter 6.1. National Capital Planning Commission, Staff Recommendation.....	41
Letter 6.2. National Capital Planning Commission.....	73
Letter 7. Smithsonian Institution	75
Letter 8. U.S. Commission of Fine Arts.....	77
Letter 9. U. S. Environmental Protection Agency, Region III.....	78
Letter 10. U.S. General Services Administration	89
Letter 11. Washington Metropolitan Area Transit Authority.....	90


SPECIFIC COMMENTS AND SUPPLEMENTAL RESPONSES

COOPERATING AGENCIES

Comment	Letter 1. Advisory Council on Historic Preservation	Response
<p>A</p> <p>B</p>	<div style="text-align: center;">  <p>Preserving America's Heritage</p> </div> <p>March 17, 2010</p> <p>Ms. Susan Spain Project Executive, The National Mall Plan National Mall & Memorial Parks 900 Ohio Drive Washington, DC 20024-2000</p> <p>Ref: <i>Proposed National Mall Plan ACHP Comments on the Draft Environmental Impact Statement Washington, District of Columbia</i></p> <p>Dear Ms. Spain:</p> <p>The Advisory Council on Historic Preservation (ACHP) has reviewed the Environmental Impact Statement prepared by the National Park Service (NPS) for the proposed National Mall Plan. The plan promises to bring much-needed attention to stewardship of infrastructure while reinforcing the significant characteristics of the historic properties and landscapes. The challenge of pulling together the multiple layers of meaning and use of this special place is enormous. We do have concerns, however, that this document functions effectively as a set of coordinated action items but does not lead to a coherent and seamless experience for visitors of the mall as a whole, as these plans become implemented. We would like to make the following observations and suggestions regarding the Draft EIS:</p> <p>1. The scope of the National Mall Plan is limited by the areas over which the National Park Service has control. Yet the concept and the experience for visitors of the National Mall extends beyond those boundaries. We urge the National Park Service to place the highest priority on development of an updated National Register nomination that records and formalizes the entity of the Mall as a whole, using historic precedents and plans to set the most comprehensive meaningful boundary.</p> <p>2. The EIS contains a very useful chapter entitled "Interrelationships with Other Plans and Projects". ACHP believes that the National Mall Plan should not only describe these related plans, but should identify clearly and comprehensively the ways in which the National Mall Plan supports and responds to these plans, how the plans conflict and how this National Mall Plan proposes to resolve these conflicts.</p> <div style="text-align: center; font-size: small;"> <p>ADVISORY COUNCIL ON HISTORIC PRESERVATION 1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004 Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov</p> </div>	<p>A. To address your concerns, the National Park Service has proposed to update the nomination for the National Register of Historic Places. The updated national register nomination for the National Mall would at a minimum cover all areas within the NPS planning area, integrating cultural landscapes and historic districts.</p> <p>B. Because the National Park Service has been involved in vision planning simultaneously with various other planning organizations as specific plans are being developed, we believe there are no conflicts.</p>

NOTE: Comments have been printed as they were written, without correcting spelling or grammatical errors. Comments irrelevant to the plan have not been printed.

Comment	Letter 1. Advisory Council on Historic Preservation (cont.)	Response
<p>C</p> <p>D</p> <p>E</p> <p>F</p>	<p style="text-align: center;">2</p> <p>3. With a sizeable number of projects anticipated to be undertaken in the near future, we urge that this plan establish a consistent approach to these projects, and in particular, identify principles and priorities for decision making on individually funded projects. Examples of decisions which could be guided by such principles include: determining when utility will trump historic value, differentiating distinctive versus linking features, and so on.</p> <p>4. We urge the National Park Service to revisit the alternatives and, without necessarily changing the overall focus, bring these alternatives to life as thorough approaches with clear and distinctive outcomes fully distinguishable from the Preferred Alternative. For example, despite the fact that the National Park Service has no control over areas beyond NPS property boundaries, the alternatives can suggest ways in which relationships between parcels can be strengthened.</p> <p>We appreciate the opportunity to participate in this important initiative and we look forward to the next phase. If you have any questions or require our further assistance, please contact Louise Dunford Brodnitz at 202-606-8527, or via e-mail at lbrodnitz@achp.gov.</p> <p>Sincerely,</p>  <p>Caroline D. Hall Assistant Director Office of Federal Agency Programs Federal Property Management Section</p>	<p>C. The National Park Service is preparing priority listings.</p> <p>D. Principles for planning were listed in newsletter 2, which were used in the development of planning objectives presented in the <i>Draft Environmental Impact Statement</i> (beginning on p. 4). They have been updated and added as appendix F in the <i>Final Environmental Impact Statement</i>, as discussed in NHPA section 106 consultations. Priorities will be identified once a final plan has been approved.</p> <p>E. As described in the <i>Draft Environmental Impact Statement</i> (pp. 51–52), alternatives A, B, and C were developed as full alternatives before the preferred alternative was developed.</p> <p>F. Because the National Park Service has no control over adjacent areas that are managed by other entities, extra effort has been undertaken to work closely with cooperating agencies, as well as planning offices and agencies, to ensure that plans are coordinated, complementary, and cohesive.</p>

Comment	Letter 2.1. Architect of the Capitol	Response
A	<div data-bbox="625 232 730 345" data-label="Image"> </div> <p data-bbox="575 367 779 386">Washington, DC 20515</p> <p data-bbox="604 410 743 430">February 23, 2010</p> <p data-bbox="287 496 583 578">Mr. Marcel Acosta, Executive Director, National Capital Planning Commission 401 9th Street, NW, Suite 500 N Washington, DC 20004</p> <p data-bbox="287 602 422 621">Dear Mr. Acosta:</p> <p data-bbox="287 646 1058 704">I wanted to take a moment to thank key National Park Service (NPS) staff for their extensive efforts to coordinate work on The National Mall Plan with the Office of the Architect of the Capitol (AOC) throughout the planning process.</p> <p data-bbox="287 729 1058 833">Over the past several years, we have appreciated the opportunity to attend many of NPS Cooperating Agency meetings, to schedule and participate in briefings provided by NPS for Members of Congress and staff from several Congressional committees, to collaborate on the preparation of an informational brochure with NPS, the National Capital Planning Commission, and the DC Office of Planning, and to review and to comment on the <i>Draft National Mall Plan and Environmental Impact Statement</i>.</p> <p data-bbox="287 857 1058 980">We appreciate the NPS's work on this important document, which provides a vision and long-term management plan for the National Mall. As stewards of adjacent land — the U.S. Capitol complex — we look forward to our continued inclusion in the process to finalize The National Mall Plan. As the AOC moves forward with its own Capitol Complex Master Plan, we understand the value of looking toward the future in caring for our national assets, and we share a mutual goal to be good stewards of the natural treasures entrusted to our care.</p> <p data-bbox="287 1005 611 1149">Sincerely,  Stephen T. Ayers, AIA, LEED AP Acting Architect of the Capitol</p> <p data-bbox="287 1174 768 1193">cc: Ms. Susan Spain, Project Executive, The National Mall Plan</p> <p data-bbox="287 1234 426 1253">Doc. No. 100222-02-02</p>	<p data-bbox="1142 651 1896 716">[EDITOR'S NOTE: This is a copy of the letter from the Architect of the Capitol to the National Capital Planning Commission commenting on the <i>Draft National Mall Plan / Environmental Impact Statement</i>.]</p> <p data-bbox="1142 899 1915 941">A. The National Park Service appreciates the ongoing support of the Architect of the Capitol throughout this planning process and looks forward to continued cooperation.</p>

Comment	Letter 2.2. Architect of the Capitol	Response
<p>A</p> <p>B</p>	<div data-bbox="636 228 743 342" data-label="Image"> </div> <p data-bbox="590 367 798 386">Washington, DC 20515</p> <p data-bbox="632 402 758 422">March 18, 2010</p> <p data-bbox="321 480 596 586">Ms. Susan Spain, Project Executive National Mall and Memorial Parks ATTN: National Mall Plan 900 Ohio Drive, S.W. Washington, DC 20024-2000</p> <p data-bbox="321 610 449 630">Dear Ms. Spain:</p> <p data-bbox="321 654 1068 824">Thank you for the opportunity to comment on the Draft National Mall Plan and accompanying Environmental Impact Statement. The Architect of the Capitol (AOC) has participated in the National Mall Plan public process since the fall of 2006, and served as a Cooperating Agency throughout the Plan's development. As a framework for future decision-making and blueprint for recommended physical improvements to preserve and enhance continued public use of the National Mall, we applaud your efforts and your commitment to employing an inclusive process. Based on proximity to the Capitol complex, our comments focus on Union Square and proposals related to its future use and redesign.</p> <p data-bbox="321 849 1068 1040">Union Square is surrounded by Capitol complex property on three sides and prominently located on what is essentially the threshold of the United States Capitol. As such, we cannot stress enough the importance of a continued partnership as discussion progresses on potential redevelopment of the site. Of paramount interest are the issues of safety and security of those working and visiting the Capitol and its environs; attaining consensus on the appropriate density and type of use encouraged; providing appropriate coordination on use permit requests; preserving those elements of the space deemed important in terms of their inherent visual, cultural, and historical significance; and, ensuring the final design is both sensitive and complementary to existing and proposed land uses on adjacent Capitol complex property.</p> <p data-bbox="321 1065 1068 1192">We find the concept of exploring design scenarios through the employment of a national design competition compelling and support doing so as a cooperative effort between the National Park Service and the AOC. Further, to ensure success, it is our opinion that other key Capitol complex stakeholders – not just representatives of the AOC – will need to be involved throughout such a process, from development of design goals and guidelines, to membership on the selection committee.</p>	<p data-bbox="1142 943 1940 989">A. We appreciate your listing of important criteria for Union Square. We agree that a continued partnership is essential for the redevelopment of Union Square.</p> <p data-bbox="1142 1102 1940 1239">B. We are pleased that the idea of a design competition is of interest and support your suggestion that Capitol Complex stakeholders and the National Park Service jointly develop design goals and guidelines and participate in the selection process. We would further recommend that the U.S. Commission of Fine Arts, the National Capital Planning Commission, the Advisory Council on Historic Preservation, and the D.C. Historic Preservation Office be involved in drafting design goals and guidelines.</p>

Comment	Letter 2.2. Architect of the Capitol (cont.)	Response
	<p>Ms. Susan Spain March 18, 2010 Page 2</p> <p>In closing, thank you again for your interest in our comments. We look forward to continuing the dialogue and being a part of the Plan's implementation and future success.</p> <p>Sincerely,</p>  <p>Stephen T. Ayers, AIA, LEED AP Acting Architect of the Capitol</p> <p>Doc. No. 100309-13-01</p>	

Comment	Letter 3. District of Columbia Office of Planning	Response
---------	---	----------

District of Columbia Office of Planning



Office of the Director

March 18, 2010

Susan Spain
 Project Executive
 The National Mall Plan
 National Mall & Memorial Parks
 900 Ohio Drive, S.W.
 Washington, DC 20024-2000

Dear Ms. Spain:

The DC Office of Planning has completed its review of the DRAFT National Mall Plan/Environmental Impact Statement. Thank you for incorporating so many of the comments we previously shared with the National Park Service on this document. As an example, the additional language that links the experience of the National Mall to the broader urban experience of Washington, DC, has the potential to greatly influence many future incremental decisions that are based on this Plan. There are still a few outstanding issues to be addressed that will result in a document that strongly reinforces the importance of the National Mall as a resource for the nation, our visitors, and the residents of the District.

Access to the Mall


The *Preferred Alternative* states that “a coordinated strategy to limit visitor vehicle traffic and emphasize alternative modes of transportation would be developed with the city and other government agencies.” This added language moves us in the right direction toward resolving some of the access and traffic issues the District has previously raised. However, the *Preferred Alternative* could go further to guide how transportation stops and transfer points are integrated into the Mall. For example, the *Preferred Alternative* illustration (pg 95) should include and define key stops and transfer points shown on the *Circulation: Preferred Alternative* (pg 451). This will lay the ground work for an integrated transit system that works within the framework of the National Mall Plan, suggest how transit can be coordinated with the District’s mass transit system, and guide future locations for an integrated, regional bike-share system. Visitor Parking Lots and Metro stations are already included on the illustration and the addition of transit facilities that serve visitors coming to and circulating around the Mall will highlight the importance of a balanced transportation network.

2000 14th Street NW, 4th Floor, Washington, DC 20009 voice 202-442.7600 fax 202.442.7638



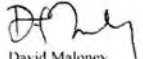
A



A. We tried to merge the maps but found that the result was too confusing graphically. To address your suggestion, a small inset map has been included on all alternative maps to show proposed visitor transportation routes and ongoing NPS projects.

Comment	Letter 3. District of Columbia Office of Planning (cont.)	Response
B	<p><u>Incorporating Active Recreation</u></p> <p>The District's suggestions for incorporating language to reinforce the importance of the National Mall as an integral part of the city's park and open space network have to some extent been added. However, the majority of these changes have been included in <i>The Affected Environment</i> chapter and not in the <i>Purpose and Need for the Plan</i> chapter that sets the tone of the entire plan. While this acknowledges that the National Mall plays a role in providing active recreation facilities for District residents and visitors, we would like to see a stronger statement about the National Mall being part of the District's park and open space network. This can be done by adding statements in the <i>Introduction</i> section as a "Plan Objective" (pg 4), and in the <i>Foundation for Planning and Management</i> section under "Purpose" (pg 9) and "Fundamental Values" (pg 11).</p> <p>That National Mall is one of the District's cultural treasures. The proposed plan is needed to restore this historic resource and return it to its full potential as a place of learning, recreation, and a valuable local and visitor destination. The District of Columbia is confident that the issues raised here, once addressed, will further refine the document, and we look forward to continuing our work with you. Should you have any questions, please contact Chris Shaheen of my staff at (202) 442-7616 or chris.shaheen@dc.gov.</p> <p>Sincerely,</p>  <p>Harriet Tregoning Director, Office of Planning</p> <p>HT/pz/cgb</p>	<p>B. In the "Foundation for Planning and Management" (DEIS, pp. 9-14) recreation is listed as both a purpose of the National Mall and as a significant component of the District's park system under fundamental values (p. 14). The plan objectives on page 7 of the <i>Draft Environmental Impact Statement</i> were revised to state that "the National Mall continues to function as an important part of the D.C. park and open space network." The Permitted Recreation map (DEIS, p. 331) has been revised and renamed to show the location of additional recreational opportunities.</p>

Comment	Letter 4. District of Columbia State Historic Preservation Officer	Response
<p>A</p> <p>B</p>	<p style="text-align: center;">GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER</p> <p style="text-align: center;">★ ★ ★ ■■■■</p> <p>March 18, 2010</p> <p>Mr. John Piltzecker Superintendent National Mall and Memorial Parks National Park Service 900 Ohio Drive, SW Washington, DC 20024-2000</p> <p>RE: Section 106 Review of the Draft National Mall Plan Environmental Impact Statement</p> <p>Dear Mr. Piltzecker:</p> <p>Thank you for providing the DC State Historic Preservation Office (SHPO) with an opportunity to review and comment on the Draft National Mall Plan Environmental Impact Statement (DEIS). We also appreciated the opportunity to meet with the National Park Service (NPS) and consulting parties on March 9th to discuss the Preferred Alternative in more detail. This letter provides our general comments regarding the potential effects of the DEIS on historic properties in accordance with Section 106 of the National Historic Preservation Act (NHPA). These comments are also being provided to assist the NPS in its efforts to meet the requirements of the National Environmental Policy Act (NEPA).</p> <p>To begin, we commend the NPS for producing such a thorough and comprehensive document. Given the significant scope of the National Mall Plan's objectives, the vast range of potential alternatives and the considerable extent of public comments, producing a document as exhaustive as this DEIS was certainly no easy task. It appears, however, that the NPS has addressed the vast majority, if not all of the comments that have been raised by the consulting parties and others throughout the consultation process. We appreciate the conscientious efforts of the NPS to consider and respond to the views of all who have expressed their concern for one of our nation's most important public spaces.</p> <p>In general terms, we agree with the Preferred Alternative as outlined in the DEIS. Since most of our previous technical comments have already been incorporated into the DEIS, this letter will summarize our remaining "big picture" concerns and suggest appropriate next steps rather than serving as an exhaustive list of detailed comments.</p> <p>The rehabilitation of Union Square remains, perhaps, the most substantial and highly visible alteration proposed under the National Mall Plan. Although we fully understand why the Preferred Alternative focuses on the future functionality of the envisioned space, we are concerned that the DEIS is too prescriptive in stating that turf would be "minimized, eliminated, or redesigned;" that reflective and interactive water features would be included; and that the area would be redesigned as a "paved square." We also remain concerned about the visual effects of proposals like "high capacity restrooms" and "shade structures." It is possible that more green space may be appropriate based upon historical precedents such as the Olmsted Plan, that a reflecting pool may not be suitable and that alternative locations for built structures should be considered to minimize adverse visual effects.</p> <p>Even though the approved design for the rehabilitation of Union Square may ultimately incorporate many of the suggestions of the Preferred Alternative, we urge the NPS to avoid adopting any language that could substantially restrict the subsequent consideration of alternatives to avoid, minimize or mitigate adverse effects on historic properties. Given the prominence of the location and the potential effects of such a substantial rehabilitation, we also support the suggestion that has been made to initiate an international design competition for this project.</p> <hr/> <p style="text-align: center;">2000 14th Street, N.W., 4th Fl., Washington, D.C. 20009 202-442-7600, fax 202-442-7638</p>	<p>A. Since it is impossible at this time to determine what the design for Union Square might include, we recommend ongoing consultation. As stated in response 2.2B, the Architect of the Capitol is interested in treating Union Square cooperatively and finds a design competition compelling.</p> <p>B. The goal of the preferred alternative is to provide sufficient guidance for future design teams without being too prescriptive. As described in responses 2.2A and B, the Architect of the Capitol has provided some criteria, and we suggest involvement by the U.S. Commission of Fine Arts, the National Capital Planning Commission, the Advisory Council on Historic Preservation, and the D.C. Historic Preservation Office to avoid, minimize, or mitigate adverse effects on historic properties.</p>

Comment	Letter 4. District of Columbia State Historic Preservation Officer (cont.)	Response
<p>C</p> <p>D</p> <p>E</p> <p>F</p> <p>G</p>	<p>Mr. John Piltzecker Section 106 Review of the Draft National Mall Plan Environmental Impact Statement March 18, 2010 Page 2</p> <p>Examples of other substantial projects identified in the Preferred Alternative include the multipurpose center proposed for the site adjacent to the Sylvan Theater near the Washington Monument, the redesign and rebuilding of the Tidal Basin walkways and the rehabilitation of Constitution Gardens. As previously indicated, we generally support the preferred approaches identified in the DEIS for these projects but we reemphasize the importance of carefully considering the widest range of possible alternatives in order to ensure that effects on historic properties are fully considered in project planning.</p> <p>Although not included within the Preferred Alternative, some aspects of other DEIS alternatives may warrant further consideration as project planning continues. If these suggestions do not prove to be valid options, they may serve as appropriate mitigation measures for future adverse effects. Examples may include the differing approaches considered for rehabilitation of the lake in Constitution Gardens, subtle grading of the lawn panels to minimize visual effects on the primary east-west axis, reducing wear and tear on the National Mall by emphasizing connections to adjacent parks, and physically extending Constitution Avenue to the Belvedere.</p> <p>Not all "impacts" identified pursuant to NEPA translate equally into "effects" determined under the NHPA so we appreciate that the DEIS states that "actions proposed in the plan are conceptual and their actual impact on cultural resources cannot be determined at this time" and that further analysis of impacts on cultural resources is required in accordance with the NHPA. We point out that some of the impacts of the Preferred Alternative which are identified as being "beneficial" might ultimately be determined "adverse" under Section 106 despite their beneficial aspects. One example may be construction of the new multipurpose visitor service facility at the Washington Monument which could have adverse visual effects. Conversely, proposals which are identified as having adverse impacts such as providing a new multipurpose facility at the east end of Constitution Gardens, could be determined to have "no adverse effect" under Section 106 because that facility was proposed in the relatively recent Skidmore, Owings and Merrill plan for that area.</p> <p>The broad scope of actions proposed in the National Mall Plan will clearly result in adverse effects on historic properties. These effects are likely to be caused both by individual projects and by the cumulative impact of all of the proposed projects on the National Mall. Since it is not possible to identify all of the adverse effects until further review is conducted, we concur that a Programmatic Agreement (PA) which stipulates future consultation and the development of subsequent, project-specific Memoranda of Agreement is the best way to meet the requirements of Section 106. According to 36 CFR 800.14(b)(1)(ii) "programmatic agreements may be used when effects on historic properties cannot be fully determined prior to approval of an undertaking."</p> <p>Table 41 on page 547 of the DEIS contains a list of on-going and National Mall Plan actions that has been categorized into those actions which do, and those which do not require further consultation. While we generally agree with the determinations specified in the table, we point out that unforeseen effects can sometimes be identified only after detailed project planning has been initiated and all implications of the project have been ascertained. The potential for unforeseen effects can increase depending upon the proposed scope of work. Therefore, we would appreciate at least some minimal NPS coordination regarding the scopes of work for all of the actions identified in Table 41. The degree to which any such future coordination is carried out may be addressed in the upcoming PA.</p> <p>The PA should include a prioritized list of projects to the extent that it is possible to do so. This list could be based upon issues such as project cost, the likelihood of obtaining funding and the overall need for the project. Obviously, that list would be subject to change, but having identified priorities would serve as a useful tool for scheduling necessary meetings with consulting parties and allow for sufficient time to conduct thorough research or associated analyses. For example, elements of the Skidmore Owings and Merrill Plan for the National Mall may require further evaluation to determine their National Register eligibility so determinations of eligibility may yet be necessary.</p>	<p>C. We agree that within the preferred alternative there are many different ways to undertake a design. We believe that a programmatic agreement with your office and the Advisory Council on Historic Preservation should establish a framework for developing design alternatives that are consistent with the National Mall.</p> <p>D. Ongoing consultation should be able to address issues that may arise. In the case of subtle grading, research for the Mall turf project uncovered historic grading plans from the 1930s and designed by Frederick Law Olmsted Jr. These plans crowned the turf panels, which together with recessed walks, achieved the visual continuity of a tapis verte.</p> <p>E. We agree that the effects may not be fully determined until designs have been started. That is the purpose of ongoing consultations. The listing of projects in the <i>Draft Environmental Impact Statement</i> has been updated, and a priority listing will be developed once a plan has been approved.</p> <p>F. The proposed plan constitutes a coordinated vision for the National Mall that has been developed with cooperating agencies, including your office. Please also see response C to your letter.</p> <p>G. We suggest that a listing of priorities and development map accompany a programmatic agreement. Evaluation of the as-built Skidmore, Owings and Merrill plan elements of the National Mall can be included in the process that is developed for updating the National Mall nomination.</p>

Comment	Letter 4. District of Columbia State Historic Preservation Officer (cont.)	Response
<p>H</p> <p>I</p> <p>J</p>	<p>Mr. John Piltzecker Section 106 Review of the Draft National Mall Plan Environmental Impact Statement March 18, 2010 Page 3</p> <p>It has been suggested in earlier NPS newsletters and by some consulting parties and cooperating agencies that the PA should include protocols to better define how and when consultation will be conducted for future projects. We concur that protocols can be effective tools to achieve consensus and we would support reasonable efforts to develop general guidelines that could be applicable to the broad range of projects proposed in the National Mall Plan. Other topics that may be appropriate for such protocols include how and when historical plans for the National Mall area will be referenced, how alternatives for specific projects should be developed to respond and relate to current city plans such as the Framework Plan, and the manner in which cooperating agencies should jointly evaluate a given proposal.</p> <p>In our opinion, one of the most important components of the forthcoming PA should be a requirement for a National Historic Landmark (NHL) nomination or, at a minimum, a single, comprehensive National Register nomination, which includes everything that most Americans think of when they envision the National Mall. This nomination will clearly include properties beyond those which are managed by the NPS. We believe this action is necessary to respond to one of the most common and consistent concerns expressed by the consulting parties throughout the Section 106 review of the National Mall Plan. A specific observation about the DEIS which may illustrate this point is that the National Register-Listed Department of Agriculture Building is not highlighted on the map entitled "National Register Historic Districts and Properties." Although this is a minor point that can easily be corrected, it does emphasize the need for a comprehensive document to identify and evaluate all of the buildings, structures, monuments, open spaces, sites and other features which contribute to the national significance of the Monumental Core.</p> <p>We look forward to working closely with all parties to develop an appropriate Programmatic Agreement that will complete the Section 106 review of the National Mall Plan and we commend the NPS again for its efforts thus far. If you should have any questions or comments regarding this matter, please contact me david.maloney@dc.gov or 202-442-8850 or Andrew Lewis at andrew.lewis@dc.gov or 202-442-8841. Thank you for providing additional opportunities to review and comment on this important undertaking.</p> <p>Sincerely,  David Maloney DC State Historic Preservation Officer</p>	<p>H. We agree and suggest that the protocols address some issues that have come up repeatedly during the NHPA section 106 consultations, such as defining built and extant or removed historic elements versus elements that were proposed in a historic plan but were never built. When a priority list is complete, it may be possible to identify which projects would benefit from cooperating agency involvement in articulating program development.</p> <p>I. We agree; see response 1A.</p> <p>J. It was not the purpose of the <i>Draft Environmental Impact Statement</i> to list all historic structures. We agree that at a minimum a single comprehensive NRHP nomination may be a good place to fully articulate what is within the monumental core.</p>

Comment	Letter 5.1. Federal Reserve Board	Response
	 <p>Keith.F.Bates@frb.gov 12/28/2009 09:29 AM</p> <p>To Susan_Spain@nps.gov cc Marie.S.Savoy@frb.gov bcc Subject Re: Cooperating Agencies - National Mall Plan Draft EIS release this week</p> <p>History:  This message has been replied to.</p> <p>Susan:</p> <p>You have a wonderful document, it is very well done.</p> <p>We do not believe we need to meet again as a cooperating agency. If you have any more cooperating agency meetings we would be willing to participate. We hope we were of some value to your project, it is long overdue.</p> <p>Happy Holidays and good luck,</p> <p>Keith</p> <p>Keith Bates, P.E. Assistant Director for Facilities Tel 202-452-3720</p>	
Comment	Letter 5.2. Federal Reserve Board	Response
	<p>Keith.F.Bates@frb.gov 03/18/2010 04:40 PM</p> <p>To Susan_Spain@nps.gov cc Subj Re: National Mall Plan Comment Period ends today - March ect 18, 2010</p> <p>Susan</p> <p>We have no comments. We are looking forward to the changes.</p> <p>Keith</p> <p>Keith Bates, P.E. Assistant Director for Facilities Tel 202-452-3720</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation	Response
---------	--	----------

STAFF RECOMMENDATION



Witherell

NCPC File No. 7060

**THE NATIONAL MALL
DRAFT NATIONAL MALL PLAN**

The National Mall
Washington, DC

Submitted by the National Park Service

February 25, 2010

Abstract

The National Park Service has submitted a draft plan for the management and stewardship of the land in its jurisdiction on the National Mall. The plan is a framework for future decision-making and implementation of physical improvements for the protection of the National Mall's renowned natural and cultural resources, new visitor amenities and services, additional accommodations for First Amendment demonstrations and special events, better-linked circulation in a range of modes, accessibility throughout the Mall, additional opportunities for active and passive recreation, and improved visitor information and education. The National Park Service's goal for the National Mall is that it be a model in sustainable urban park development, resource protection, and management.

Commission Action Requested by Applicant

Approval of comments on the draft National Mall Plan, pursuant to 40 U.S.C. § 8722(b)(1) and (d)).

Executive Director's Recommendation

The Commission:

Comments favorably on the draft National Mall Plan as a well-considered plan that balances equally important requirements for this nationally preeminent public place: the stewardship of the natural and cultural resources of the symbolic, historic landscape; and the encouragement and accommodation of public access and use; as shown on NCPC Map File No. 1.41(00.00)42987.

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 2</p> <p>Commends the National Park Service for meeting the planning and management objectives for the National Mall within the broader planning context of Washington, and for complementing and reinforcing the Monumental Core Framework Plan, which protects the historic landscape of the National Mall by extending some of its qualities to adjacent areas and by creating linkages with the National Mall.</p> <p>Supports:</p> <ul style="list-style-type: none"> • Conservation of the National Mall’s nationally significant natural resources through the implementation of best practices for the improvement and long-term protection of the turf lawn and trees, including management of the intensity, duration, and location of special events. • Development of a visitor transportation system for the National Mall that offers optional interpretation and that is well-linked with transit service and has a coordinated fare structure. • Improvements in the appearance, number, and variety of visitor amenities and services through the redevelopment of appropriate sites with multi-purpose facilities dispersed throughout the National Mall. • Improvements to the National Mall as a civic stage to include the redevelopment of the Capitol Reflecting Pool as Union Square, with a comprehensive, high-caliber landscape plan that will connect the National Mall and the U.S. Capitol. • Provision of full accessibility throughout the National Mall. • Expansion and separation of the bicycle path system for recreation and circulation, and the rehabilitation of athletic fields to increase capacity, flexibility, and durability. • Development of new infrastructure so that the National Mall becomes a sustainable urban park. <p>Recommends that the National Park Service, in the development of the final National Mall Plan:</p> <p>A</p> <ul style="list-style-type: none"> • Add and update the maps and analysis with the projects now in development by the National Park Service, including the Martin Luther King, Jr. Memorial, the Vietnam Veterans Memorial Visitors Center, the Lincoln Memorial Reflecting Pool Rehabilitation, and the Potomac Park Levee. <p>B</p> <ul style="list-style-type: none"> • Prioritize short-term and long-term projects to support progress in the implementation of the Plan. <p>C</p> <ul style="list-style-type: none"> • Incorporate findings of the current National Mall Turf Study to support the proposed protection of vegetation that defines the historic plan and vistas of the National Mall. 	<p>A. An inset map has been added on all alternative maps to show proposed visitor transportation routes and ongoing NPS projects.</p> <p>B. We agree, and a listing has been developed and will accompany the record of decision.</p> <p>C. The following text has been added to the <i>Final Environmental Impact Statement</i> under “Purpose of and Need for the Plan: Interrelationships with Other Projects”:</p> <p><i>Mall Soil and Turf Study.</i> At the request of Secretary of the Interior Ken Salazar, a consultant design team with expertise in sports field development is developing a plan to restore the central Mall turf panels. The approach is to remove soil to a depth of about 2 feet and replace it with a compaction-resistant but drainable soil system. Turf panels would be crowned for good drainage, as they were designed in the 1930s by Frederick Law Olmsted Jr. The project includes the development of a durable irrigation system that would reuse captured rainwater stored in underground cisterns for irrigation. The system would also seek to use groundwater currently being removed from tunnels under the National Mall. This sustainable approach would help meet the requirements of Executive Order 13514 (“Federal Leadership in Environmental, Energy, and Economic Performance”) to reduce the use of potable water by 26% by 2020.</p> <p>This is an important goal because the National Mall is the highest user of potable water in the national park system.</p>

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
<p>D</p> <p>E</p> <p>F</p>	<p style="text-align: right;">NCPC File No. 6070 Page 3</p> <ul style="list-style-type: none"> • Amplify the discussion of objectives and strategies for improving sustainable resource management and for meeting the requirements and goals of Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance. <p>Further recommends that the National Park Service:</p> <ul style="list-style-type: none"> • Resume planning and development of the proposed visitor transportation system with its partners. • Implement the 2003 Olin landscape plan for the Washington Monument Grounds, revising it as warranted in concert with the Smithsonian Institution’s development of the National Museum of African American History and Culture and with other anticipated development on the Grounds. <p style="text-align: center;">* * *</p> <p>PROJECT DESCRIPTION</p> <p><u>Site</u></p> <p>The National Mall Plan Area is shown in Figure 1. The National Mall covers 684 acres and received 22.3 million visits in 2008. The Plan Area extends from the foot of the U.S. Capitol— at the Grant Memorial – to the Potomac River west of the Lincoln Memorial; and from Constitution Avenue to Independence Avenue, 15th Street, and the highway bridges south of the Jefferson Memorial.</p> <p>Much of the open space and commemorative landscape of the National Mall is under the jurisdiction of the National Park Service (NPS), but many government agencies and entities have jurisdiction over lands and roads within and adjacent to the National Mall, including the Architect of the Capitol, the National Gallery of Art, the Smithsonian Institution, the Department of Agriculture, the General Services Administration, the District of Columbia, and the Washington Metropolitan Area Transit Authority. In addition, federal and District of Columbia agencies, including the National Capital Planning Commission (NCPC), have review and approval authority for planning, historic preservation, commemorative works, and design.</p>	<p>D. The following text has been added in “Environmental Consequences: Park Operations — Methodology for Impact Analysis” to provide more detail.</p> <p>The National Park Service’s goal for the National Mall is to be a role model in sustainable urban park development, resource protection, and management, with a focus on six areas — requirements and policy, resource health, water use, circulation, facilities, and park operations.</p> <ol style="list-style-type: none"> 1. Requirements and Policy — Satisfy Executive Order 13514 (“Federal Leadership in Environmental, Energy, and Economic Performance”); satisfy NPS policy and program goals such as Climate Friendly Parks and meet minimum LEED silver standards. Achieve NPS goals to reduce energy use, reduce greenhouse gases, maximize energy efficiency, and improve building envelopes, mechanical systems, and glazing. 2. Resource Health — Implement the Sustainable Sites Initiative™; restore soils and reverse soil compaction; improve tree health and growing conditions; continue tree planting and replacement; reduce impacts from high use levels on natural resources; protect special status trees (elm, cherry, and witness trees); preserve or restore plant biomass; and improve ecosystem health. 3. Water Use — Conserve water; reduce the use of potable water in compliance with Executive Order 13514; reduce the use of potable water in large designed water bodies; use nonpotable water sources when feasible; capture, store, and reuse storm and gray water for irrigation; filter and reuse water; complete the Potomac Park levee; use a vegetated shoreline along the Potomac River where feasible; and rely more on natural methods to improve water quality. 4. Circulation — Facilitate pedestrian activities; use clean alternative fuel sources in visitor transportation; maximize use of public transportation; facilitate multimodal coordination; separate bicycle routes and offer rentals; use sustainable approaches to walkway surfacing to facilitate water reuse or increase percolation. 5. Facilities — Strive to achieve the highest LEED standards possible for new facilities (the minimum LEED standard for NPS facilities is silver). Facilities should provide information about sustainable technologies and approaches. 6. Park Operations — Reduce energy consumption and seek renewable energy sources; maximize energy efficiency and convert inefficient approaches (e.g., using LED lighting instead of incandescent bulbs); increase recycling, reduce amount of solid waste, and increase use of biodegradable products. Additionally, the National Park Service has incorporated a staff bike-sharing program and uses alternative fuel vehicles as part of its fleet. <p>In addition, an objective for sustainability has been added on page 8, Table 6 has been updated, and a planning principle for sustainability has been added (see final document, appendix F).</p> <p>E. The <i>Visitor Transportation Study</i> was completed on February 5, 2010, with the signing of the “Finding of No Significant Impact.” The National Park Service has started partnership discussions with public transportation providers.</p> <p>F. A description of the Olin landscape plan has been added in “Purpose of and Need for the Plan: Scope of this Document — Opportunities, Problems, and Challenges” (DEIS, p. 29), and an action has been added to the preferred alternative for the Washington Monument grounds (pp. 91 and 210, actions for row 13.1).</p>

Comment

Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)

Response

NCPC File No. 6070
Page 4

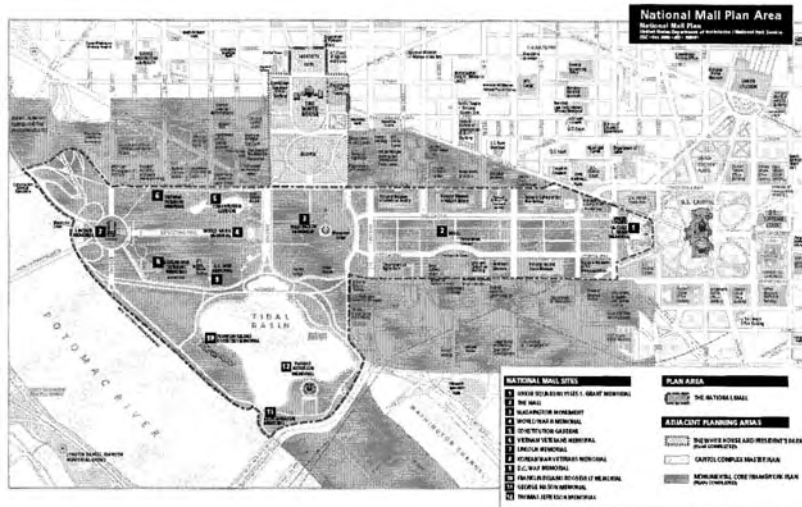


FIGURE 1: National Mall Plan Area

Planning Background and Context

The National Mall is the heart of Washington's Monumental Core. It is a place of inspiration, contemplation, pilgrimage, education, and recreation. It is a busy hub of local and national activities. It is open greenspace in the heart of Washington. It has been the subject of seminal plans by L'Enfant and the McMillan Commission, as well as significant landscape plans by Andrew J. Downing, Frederick Law Olmsted, Jr., Skidmore, Owens, and Merrill (SOM), and Laurie Olin, among others. National museums and memorials have reframed and reshaped the appearance and symbolic character of the Mall since the founding of the capital city. This evolutionary growth continues today with a new memorial under construction and sites for a new memorial visitor center and a new national museum selected.

The National Mall is a destination for millions of visitors and thousands of events and activities annually, and is serviced by a range of transportation modes. Ancillary buildings serving the needs of visitors have been a part of the Mall since the nineteenth century and include the historic Monument and Survey Lodges, the Sylvan Theater, and more contemporary restrooms and food kiosks.

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: center;">NCPC File No. 6070 Page 5</p> <p>NCPC's 1997 <i>Legacy Plan</i> is a vision plan for integrating the Monumental Core in the life of the city and extending the qualities and uses of the National Mall throughout the Core and Washington. The 2001 <i>Memorials and Museums Master Plan</i> furthers Legacy's goals for the protection of the National Mall's open space. It also advances the public discussion of how to accommodate the continued desire by many Americans to memorialize events and people deemed important to the nation. It recommends attractive and meaningful sites throughout the city, envisioning our capital city as the nation's premier commemorative landscape.</p> <p>The National Mall Plan observes Congress's establishment of the Reserve in 2003. NPS and NCPC are currently embarked on a joint study entitled <i>Washington as Commemoration</i>, which will guide future planning for national commemoration. The current study provides an inventory of the subjects and themes in Washington's commemorative landscape and investigates the commemorative policies and practices of other American and international capital cities.</p> <p>The <i>Monumental Core Framework Plan</i>, completed by NCPC and the U.S. Commission of Fine Arts (CFA) in April 2009, creates the framework for continued implementation of Legacy goals and concepts in three precincts surrounding the National Mall. It articulates specific planning objectives for extending some of the Mall's symbolic qualities and uses throughout the Monumental Core and creating and enhancing physical and visual connections between the National Mall and the surrounding city.</p> <p>The National Park Service's (NPS) draft National Mall Plan contributes significantly to these planning efforts. In addition to the <i>Monumental Core Framework Plan (Framework Plan)</i>, the draft National Mall Plan also complements NPS's 2000 <i>White House and President's Park Plan</i>; the District of Columbia's 2008 <i>Center City Action Agenda</i>, which redefines central Washington with the Mall as its centerpiece and advances Washington's identity as a waterfront city; and the <i>Capitol Complex Master Plan</i>, now in development by the Architect of the Capitol.</p> <p>The development of the draft Plan has been, in part, a response to increasing public and congressional concern in recent years for the physical appearance and uses of the Mall, awareness of and interest in commemorative works, and debate about the presence and appearance of security barriers.</p> <p>On April 12, 2005, former NCPC Chairman John Cogbill testified at the invitation of Senator Craig Thomas before the Senate Subcommittee on Natural Parks of the Committee on Energy and Natural Resources. Senator Thomas's interest was planning for future development and growth on the National Mall while "maintaining the National Mall as a place of national significance." Mr. Cogbill emphasized that the <i>Legacy Plan</i> is the guiding visionary plan for the next 50 - 100 years and noted Congress's creation of the Reserve on the cross-axis of the Mall in the 2003 reauthorization of the Commemorative Works Act. Mr. Cogbill also testified, "A new Mall master plan would be a valuable tool in preserving its historic landscapes, managing its physical development, and improving its maintenance and services for visitors and residents alike."</p> <p>NPS introduced the prospective development of the plan for the National Mall to the public in the fall of 2006 with a week-long public symposium in Washington and media events and</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: center;">NCPC File No. 6070 Page 6</p> <p>interest nationwide. NPS established a website and developed newsletters to inform the public and solicit suggestions and comments. The website now contains a great deal of information about past and current planning and management of the National Mall, including documents describing the historic memorials, features, and landscapes of the Mall; studies and findings on transportation planning, the condition of the elms, and visitor habits and preferences; and public correspondence and comments posted over the past three years.</p> <p>While developing the draft Plan, NPS staff has met with dozens of school, community, civic, business, and professional organizations, soliciting feedback and answering questions. The public process has been extensive and the public comments far-ranging, from the need for more restrooms and better food options to concern for the physical appearance of the landscape; and from the importance of First Amendment demonstrations on the Mall to the need for full visitor access.</p> <p>The draft National Mall Plan is contained within a 600-page draft Environmental Impact Statement (EIS) that is currently being read and commented on by the public, government agencies, and organizations during a 90-day comment period. The Commission's discussion and comments occur within this 90-day period and will be considered by NPS as it completes its EIS and final National Mall Plan. NCPC is a cooperating agency for purposes of the National Environmental Policy Act.</p> <p>NPS is also conducting historic preservation review and consultation under the requirements of the National Historic Preservation Act. Section 106 consultation has taken place during each phase of the Plan's development, most intensively and specifically in the spring of 2009, when a regular series of meetings was held to consider the potential effects of possible new structures and landscape alterations to the historic fabric and character of the National Mall. NPS anticipates that the historic preservation review will conclude this summer with the execution of a Programmatic Agreement drafted with the assistance of the District of Columbia State Historic Preservation Office and the Advisory Council on Historic Preservation.</p> <p>NPS anticipates returning to the Commission for review of the final National Mall Plan in September 2010.</p> <p>The National Mall Plan, once it is reviewed and approved, will be implemented with site-specific projects to achieve the Plan's objectives. Additional compliance with the National Environmental Policy Act and the National Historic Preservation Act will be conducted for individual projects. NPS anticipates a multiyear and multidisciplinary planning and design effort. Certain actions may require congressional authorization or revision of federal or park regulations.</p> <p><u>Planning Goals - National Mall Plan</u></p> <p>The National Mall must function efficiently and flexibly at many levels: as the physical and symbolic setting for our nation's government; as part of Washington's park and open space system; as an integral component of Washington's circulation and transportation networks; as the</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 7</p> <p>setting for many of the nation's most admired memorials and museums; and as a stage for First Amendment demonstrations, national celebrations, and national and regional special events.</p> <p>The public has expressed concern in recent years for the worn condition and deteriorated appearance of the Mall turf lawn, the stewardship of the natural and cultural resources of the Mall, the sometimes-shabby conditions of visitor facilities, the limited offerings of basic visitor amenities, less-than-full accessibility to and on the Mall, the lack of signs or the cluttered appearance of signs, and some current conditions that don't allow for more sustainable management practices. Current facilities can become overwhelmed by use. Vegetation cannot easily recover, and areas of lawn may be worn to the ground and soils heavily compacted, which in turn adversely affects the vigor of trees and other vegetation. Many walks are not wide enough for current levels of use, and adjacent lawn and trees may be damaged as a result.</p> <p>The National Mall Plan is intended to provide a comprehensive vision and framework to protect the historic character of the National Mall, to restore the health and beauty of its natural resources, to improve its function as our nation's premier civic space, and to meet the needs of local, national, and international visitors for enjoyment, education, and recreation.</p> <p>The completed Plan will facilitate the ability of National Mall and Memorial Parks to seek funding for the design and construction of projects; however, completing the Plan does not ensure that all actions will be funded or take place. As the Plan is implemented, most of the proposed projects will provide additional opportunities for public involvement and will undergo agency consultation and review. Some projects might require congressional action or changes in federal or park regulations.</p> <p>The National Mall Plan is a <i>framework</i> for future stewardship, development, design, and implementation. It is akin to the Monumental Core Framework Plan in that it provides a foundation of guidance for the planning and design of an individual project or sector, but within a framework that seeks to balance comprehensive stewardship and the requirements of intensive public use for national and local purposes.</p> <p>In the implementation of future projects, NPS intends to work with well-respected firms with design expertise commensurate with the national significance of the setting. One example is the work currently underway for the rehabilitation of the Lincoln Memorial Reflecting Pool and its surrounding setting. As another example, NPS has suggested that the proposed redevelopment of the Capitol Reflecting Pool at the east end of the Mall to create a new Union Square would be appropriate for a national design competition. The project will require a comprehensive consideration of desired and appropriate uses and will involve the Architect of the Capitol as well as other agencies and organizations. The project will be the subject of broad public consultation, as well.</p> <p>The draft National Mall calls for refurbishment of the Mall's resources so that (1) its memorials and historic landscapes can be preserved, (2) very high levels of use can be sustained in designated areas, and (3) the needs of visitors can be met.</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 8</p> <p>NPS's stated goals are to:</p> <ul style="list-style-type: none"> • Improve resource conditions; establish a standard of quality that invites respect and generates stewardship; and raise the standard of care and maintenance; • Prepare for intensive levels of use for First Amendment demonstrations, national celebrations, and special events; • Provide desired experiences, such as opportunities for education, contemplation, rest relaxation, recreation, entertainment, and social experiences; • Address user capacity, which for this plan is defined as the type and level of visitor use that can be accommodated while sustaining desired resource conditions and visitor experiences on the National Mall; • Provide for the physical needs, enjoyment, and convenience of visitors and park users, including information, restrooms, food, retail, drinking water, and access. <p><u>Other Projects on the National Mall</u></p> <p>NPS and the Smithsonian Institution are both proceeding this year with projects funded by the American Recovery and Reinvestment Act (ARRA).</p> <p>NPS is repairing a portion of the Tidal Basin seawall in front of the Jefferson Memorial. NPS is also rehabilitating the District of Columbia War Memorial, returning the memorial to its original function as a concert bandstand. The Commission favorably reviewed the concept plans for the memorial in October 2009.</p> <p>NPS's largest Recovery Act project is the comprehensive rehabilitation of the Reflecting Pool and the lower approachway to the Lincoln Memorial, including the provision of full accessibility and vehicle barriers on the east side of the memorial. The source and quality of the water in the Reflecting Pool will be addressed. The project will rehabilitate the Elm Walks and improve lighting. The Commission reviewed the concept design for this comprehensive project at its September 2009 meeting and commented favorably. NPS anticipates returning to the Commission in April for further review. All of these projects were designed in concert with the development of the National Mall Plan and reflect the Plan's goals.</p> <p>Construction is underway for the Martin Luther King, Jr. Memorial in West Potomac Park. The draft National Mall Plan recommends reviewing circulation and visitor use near the Tidal Basin after the memorial opens to assess if adjustments in access and visitor amenities are necessary. The potential location of another restroom facility near the Roosevelt Memorial and Ohio Drive is indicated in the draft Plan, since this part of West Potomac Park is expected to have greater visitation due to the memorials as well as increased recreational activity.</p> <p>NPS will install a comprehensive sign and wayfinding program for Mall and off-Mall destinations this spring and summer. The project is funded by the Centennial Fund, matched by</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 9</p> <p>funds raised by the Trust for the National Mall. Comprehensive wayfinding is a component of all alternatives in the Mall Plan's draft EIS.</p> <p>In 2009, the Commission approved plans for the reconstruction of a portion of the levee in West Potomac Park and its extension eastward across 17th Street, NW onto the Washington Monument Grounds. The approved site plan includes the opportunity to redesign circulation and landscape in the area between Constitution Gardens Lake and 17th Street, NW, and for programming the now-vacant Lockkeeper's House with some of the visitor amenities proposed for this area in the draft National Mall Plan. The draft Plan recommends constructing a multi-purpose building (similar to the National Gallery of Art's Sculpture Garden restaurant pavilion) for dining, recreation, relaxation, and entertainment on the plaza at the east end of the lake.</p> <p>NPS is proceeding with design development, consultation, and review of the proposed Vietnam Memorial Visitors Center, to be located on a site west of Bacon Drive.</p> <p>The Smithsonian Institution (SI) is using ARRA funds this year for necessary repairs to the Arts and Industries Building, including proposed replacement of the (non-original) roof and windows, and repair of exterior and interior building fabric. SI is considering possible future uses for the now-vacant building. The National Museum of the American Latino Community Commission Act was signed into law in 2008. The commission is assessing the building as a possible location for a new national museum.</p> <p>The Hirshhorn Museum has proposed a seasonal pavilion and enhanced programming of its courtyard during two months of every year.</p> <p>By far the most significant construction project by the Smithsonian Institution on the National Mall is the National Museum of African American History and Culture, to be constructed on the Washington Monument Grounds between Constitution Avenue and Madison Drive, and 14th and 15th Streets. The Smithsonian and NCPC are co-lead agencies in the development of an Environmental Impact Statement for the project, and SI has engaged many consulting parties and agencies in the ongoing historic preservation review.</p> <p><u>Proposal – The Draft National Mall Plan</u></p> <p>The nation's premier civic space will be refurbished so that high levels of use can be perpetuated and the needs of visitors met in an energy-efficient and sustainable manner. Its memorials and large areas of open space will be protected. The designed historic landscape will be protected and will continue to support significant national events and accommodate contemporary visitor needs and uses. A more coherent pedestrian environment within the park will be created.</p> <p>NPS will emphasize the National Mall as a year-round destination. The draft Plan addresses improvements in conditions and facilities for First Amendment demonstrations and special events. Individuals and families will find better access to the Mall's open space through better circulation and transportation modes. Visitors will be better informed by a comprehensive system of wayfinding and signs, and made to feel more welcome with additional, improved, and</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: center;">NCPC File No. 6070 Page 11</p> <ul style="list-style-type: none"> • Create a popular, active, and dignified day and evening destination • Design it so it can be easily transformed into a larger venue for First Amendment demonstrations and events. • Provide infrastructure for demonstrations and events • Determine the location, size and character of visitor amenities through a comprehensive design plan. • Consider a smaller reflecting pool to make the space more suited to various uses and reduce water use. • Consider shade structures for visitor comfort and relaxation. • Provide facilities (located outside view corridors) such as restrooms, drinking water and recreation equipment rentals. <p>The Mall</p> <ul style="list-style-type: none"> • Improve and protect the turf lawns and elm trees. • Remove compacted soils and replace with engineered soils capable of withstanding intensive use. • No longer make the elm tree panels available for temporary event facilities, such as tents, temporary structures, and vehicles. • Redesign areas in the 8th Street and 12th Street axes for higher levels of use and to support event logistical, operational, and temporary facilities. • Design a welcome area at the head of the Metro escalators at 12th Street and Jefferson Drive, SW, to include a visitor contact station, high-capacity public restrooms, multiple orientation maps, and a tactile model or pavement map of the National Mall, along with shaded seating. • Pave gravel pathways as part of a coordinated paving plan for the National Mall; the new surface (to be determined) should be a low-maintenance, sustainable, and universally accessible material to improve circulation, facilitate events, and maintain improved landscape conditions. • Widen some north-south sidewalks to accommodate demonstrations, events, visitor amenities, or recreation. • Design subtle grading of the turf panels to maintain the appearance of continuous turf in long views. <p><i>Washington Monument Grounds</i></p> <ul style="list-style-type: none"> • Reopen the Washington Monument to visitors in the evening. • Replace the Sylvan Theater with a multipurpose facility on the Washington Monument Grounds at the northwest corner of 15th Street and Independence Avenue, SW, in the swale below the level of adjacent roads. • Offer food service, retail, information, education, integrated exhibits, restrooms, and performance space in the new facility. • Protect and improve views of the Washington Monument and the north-south vista between the Thomas Jefferson Memorial and the White House by removing the current visitor facilities buildings at the Tidal Basin. 	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 12</p> <ul style="list-style-type: none"> • Provide utility infrastructure on the grounds for First Amendment demonstrations and special events. • Improve pedestrian circulation to areas north and south of Independence Avenue, including access to the southwest waterfront and East Potomac Park. • Construct a system of separate dedicated bike trails. • Adapt the historic Survey Lodge for services and parking for visitors with disabilities. • Provide bicycle and recreation equipment rentals. • Continue to provide visitor information and restrooms at the Monument Lodge. <p><i>West Potomac Park</i></p> <p>Constitution Gardens</p> <ul style="list-style-type: none"> • Construct a multipurpose visitor destination on the paved plaza at the east end of the lake. • Provide food service, restrooms, education, retail, recreation equipment rentals (model boats, portable lawn chairs), and space for partner activities • Provide a flexible performance space, stage, or gazebo. • Rebuild the lake to be self-sustainable, with a non-potable, sustainable water source. • Offer urban recreational activities, such as fishing and model boating. • Relocate the historic canal lockkeeper's house away from the corner of 17th and Constitution Avenue NW. • Adapt the lockkeeper's house to serve some of the amenities envisioned for this area, in concert with the proposed multi-purpose building. . <p>Vietnam Veterans Memorial</p> <ul style="list-style-type: none"> • Provide additional seating in the vicinity of the memorial for contemplation and rest. <p>Lincoln Memorial and Grounds</p> <ul style="list-style-type: none"> • Expand the restrooms within the Lincoln Memorial. • Develop a ceremonial use for the Watergate steps. • Construct a restroom in the vicinity of the south refreshment stand on French Drive. <p>Korean War Veterans Memorial.</p> <ul style="list-style-type: none"> • Widen the walks on the west side of the memorial to accommodate changing circulation patterns and group visitation. <p>Ash Woods</p> <ul style="list-style-type: none"> • Rebuild the U.S. Park Police stables and redesign the area to be compatible with the historic character and quality of the National Mall. • Make the paddocks part of the visitor experience, with educational exhibits about the Park Police and horse patrols. • Replace the Ash Woods restrooms with a new restroom building nearer the stables. • Provide food service near the new restroom, if warranted by increased visitation. 	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 13</p> <p>Tidal Basin</p> <ul style="list-style-type: none"> • Create a sense of arrival at the Tidal Basin by redesigning pedestrian circulation and parking. • Provide recreational experiences for strolling, sightseeing, bicycling, and boating. • Install pedestrian lighting in a manner that would not affect the ambience of the memorial's lighting. • Rebuild the Tidal Basin seawalls (based on future engineering recommendations) above tidewater. • Retain the seawalls' historic appearance while accommodating wider walks and improving bicycling/vehicle circulation and safety. • Develop a system of separate bicycle lanes or trails. • Widen and separate walks for pedestrians and bicyclists on or near Inlet, Outlet, and Kutz Bridges. • Remove the recreation equipment rental and refreshment facilities on northeast side of the Tidal Basin. • Construct a new structure or structures for these functions and restrooms and seating in same general location, avoiding the north-south axial viewshed. <p>Franklin Delano Roosevelt Memorial</p> <ul style="list-style-type: none"> • Assess new visitor use patterns after completion of the Martin Luther King, Jr. Memorial. • Provide a small food service and restroom facility near Ohio Drive, if warranted by demand. <p>West Potomac Park Riverfront</p> <ul style="list-style-type: none"> • Establish sustainable, vegetated shoreline along the Potomac River. • Provide areas for seating, fishing, and enjoyment of the river • Provide nodes for water taxi service or for launching small, hand-carried watercraft (such as canoes or kayaks). • Develop or separate bicycle lanes, trails, and improve pedestrian walkways along Ohio Drive. <p>Thomas Jefferson Memorial and Grounds</p> <ul style="list-style-type: none"> • Allow no special event stage, roof, or walls to obstruct the view to the White House from the north plaza of the memorial. • Redesign the parking area south of the memorial for demonstrations and special events; provide utilities. • Construct bicycle lanes or trails for safer or improved access near the memorial and to the I-395/14th Street bridges. • Construct perimeter security for the memorial, handicap parking, and tour bus access. • Rebuild the refreshment stand and provide restrooms, outdoor seating, and tables. 	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
---------	--	----------

NCPC File No. 6070
Page 14

Conservation of the Natural Resources of the National Mall

The Conservation Zoning Map at Figure 3 illustrates how NPS manages its stewardship responsibilities for the natural and cultural resources of the Mall and balances them with accommodation of high intensity First Amendment demonstrations, events, and recreational activities. The draft Plan seeks to accommodate as much activity as possible in the most sustainable manner possible. NPS proposes that, in future, special events be directed to areas of the Mall designated for "High Use". The soils in these areas will be reengineered and the health of the turf protected through appropriate periods of activity and rest. The center panels of the Mall will continue to be a focus for permitted special events. As distinguished from permits for *special events*, permits for *First Amendment demonstrations* will continue to be issued by NPS for areas throughout the Mall, as requested by demonstration organizers.

The Conservation Zoning map also shows "Character Protection" areas, including the elm panels, collectively one of the most significant compositional elements of the Mall. Conceived by the McMillan Commission, the panels frame the central axial greensward and shape the universally recognized scale and formal qualities of the National Mall. While Dutch elm disease affected stands of elms throughout the country in the past half-century, NPS preserved most of its elms through research and careful treatment. Following removal of the temporary office buildings (the tempos) by the 1970s, the elm panels were finally fully planted. Individual trees are replaced as necessary, but most of the elms are mature and contribute to the landscape composition envisioned by the McMillan Commission.

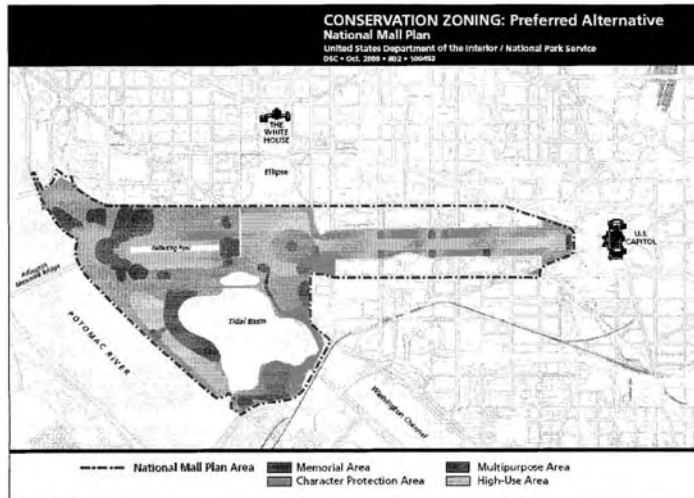


FIGURE 3: Conservation Zoning

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: center;">NCPC File No. 6070 Page 15</p> <p>The enjoyment of the Elm Panels by individuals or groups of visitors in walking, sitting, and picnicking in the elm panels will be welcomed by the addition of benches and possibly small water features on the north-south paths. The draft Plan proposes that the elm panels no longer be available for temporary facilities for special events, such as tents, temporary structures, and vehicles.</p> <p>NPS issues permits for temporary <i>special events</i> on the Mall, with conditions for use by the events' organizers. Tents, vehicles, and hundreds or thousands of event participants walking to or standing in line at events tents and vehicles (such as for food service) further compact the soil around the elm roots, damage or kill turf underneath the tents if they are covered for a prolonged period, and contribute to the creation of trash in these areas. Temporary utilities are often installed along the ground and covered with matting to prevent tripping, which further damages the grass.</p> <p>The Center for Urban Ecology, a research center for the National Park Service, has recently published a history and management plan for the elms of the Monumental Core that recommends preferred treatment for the protection of the elms. In addition, NPS has also retained the firm Hellmuth, Obata, and Kassabaum (HOK), in collaboration with nationally noted landscape experts, to research and produce a detailed treatment and protection plan for the turf of the National Mall. The National Mall Turf Study, which NPS considers one of the first and most significant implementation measures of the National Mall Plan, will be completed in the fall of 2010.</p> <p>"Multipurpose" areas on the map in Figure 3 indicate where amenities for visitors will be constructed, expanded, or improved. The dearth of restrooms on the National Mall has been particularly noted by the public in comments to NPS. Additional locations for food service will be provided, usually in proximity to restrooms. Information for visitors will be more readily available. NPS's strategy is to disperse visitor amenities throughout the Mall, but to aggregate the types of amenities, as appropriate, where they will occur. Multi-purpose facilities are proposed for the east end of the National Mall, for the east end of Constitution Gardens Lake, in a new structure to replace the Sylvan Theater, and in a new building or buildings to replace the paddle boat rental facility at the north side of the Tidal Basin. A small restroom building is proposed near the food kiosk in front of the Air and Space Museum, in an area within the Elm Panel where the trees are less mature and construction can be accommodated.</p> <p><u>Circulation</u></p> <p>The Circulation Map at Figure 4 graphically summarizes existing, improved, and proposed new routes, modes of circulation, and linkages on and around the National Mall. It includes two proposed visitor transportation routes that are described further in a Finding of No Significant Impact dated February 5, 2010 for NPS's 2006 <i>Washington, DC Visitor Transportation Study for the National Mall and Surrounding Park Areas</i>.</p> <p>The construction of separate, safer paths for pedestrians, bicycles, and vehicles is a prominent feature of the circulation plan. Routes on Ohio Drive, on Independence Avenue, around the Tidal Basin, on 15th Street, and on Madison Drive will receive particular attention. Unsafe</p>	

NCPC File No. 6070
Page 16

chokepoints at the Kutz, Inlet, and Outlet Bridges will be altered or redesigned. Bicycle connections between the Jefferson Memorial and the I-395/14th Street bridge corridor will be created or improved.

Crosswalks improvements will provide better pedestrian visibility and safety, especially near the Tidal Basin, Maine Avenue, and 15th Street, NW -- an area where the *Framework Plan* also recommends adding or improving pedestrian connections.

Tidal Basin boat service will be implemented, both for excursions and for drop-offs at various points. A proposed circulation route across the Basin is shown on the map.

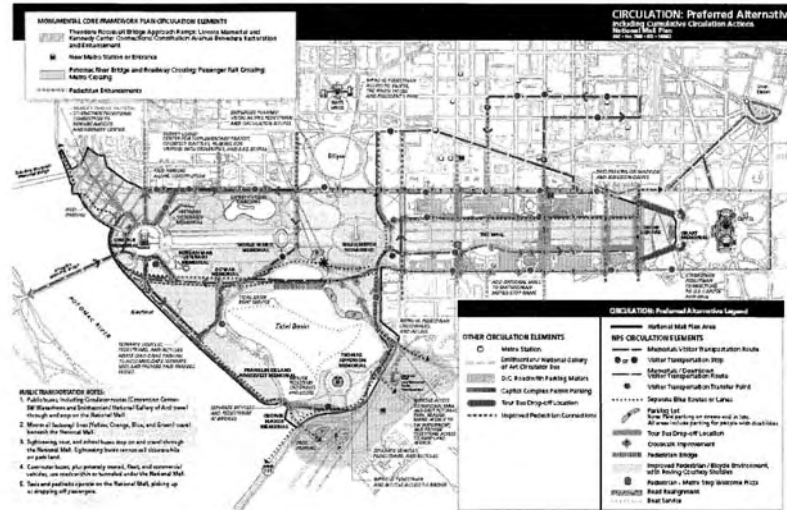


FIGURE 4: Circulation

Parking meters will be added on Madison and Jefferson Drives, on Constitution Avenue, and in all parking lots to encourage alternate means of arrival to the National Mall and to create revenue to subsidize other transportation modes, such as the proposed visitor transportation system. (3rd, 4th, and 7th Streets, NW are District of Columbia roads that already contain parking meters.) The map also designates four bus drop-off locations.

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 17</p> <p>Visitors with limited mobility will experience welcome improvements in access and services. The Survey Lodge, near the southwest corner of the Washington Monument Grounds, will be dedicated to providing supplementary transit such as electric scooters and courtesy shuttles to sites around the Mall. Handicap parking will be provided at this location, as well as in all parking lots. The repurposing of the Survey Lodge is another example of the improved circulation linkages in the draft Plan; the lodge will become a node that links transit, handicap parking, courtesy shuttles and electric scooters, a bicycle trail, bicycle racks and rental, and tour bus drop-off.</p> <p>NPS proposes that the name “National Mall” be added to the Smithsonian Metrorail station name. A visitor welcome area with orientation maps, information, and restrooms will be sited and designed near the top of the Metro escalators.</p> <p>Pennsylvania and Maryland Avenues, NW, adjacent to the Capitol Reflecting Pool, indicated in brown, are used for permit parking for the Capitol Complex. The draft Mall Plan recommends strengthening pedestrian connections to the U.S. Capitol and the Mall in these corridors.</p> <p>The D.C. Circulator’s seasonal route is shown in yellow on the map. Two proposed visitor transportation routes, with stops, are indicated in red and blue on the map and are described further in the following section of this report.</p> <p><i>Transportation Study Finding of No Significant Impact (FONSI)</i></p> <p>NPS recently released its Finding for its 2006 <i>Visitor Transportation Study</i>. The purpose of the study was to develop a range of convenient transportation services coordinated with long-term transit planning for Washington, DC. NPS found that its preferred alternative best met the purpose of the study by “providing convenient two-way transportation service, maximizing interconnection points, providing choices in level of interpretation, and expanding service to a greater number of desired visitor destinations.”</p> <p>NPS selected a hybrid solution that offers many of the advantages of public transit with flexible options for interpretation, if desired by visitors. The preferred alternative calls for two proposed new interconnected routes in the Monumental Core. (Service to Arlington National Cemetery will be extended to the U.S. Marine Corps War Memorial.) A one-way loop (shown in red in Figure 4) would connect Downtown, the Federal Triangle, the Mall, and West Potomac Park. A two-way route (shown in blue) would connect Union Station with the length and breadth of the National Mall and would extend to sites across Memorial Bridge.</p> <p>Access will be provided to 39 visitor destinations on and off the Mall. New transit stops will be located within easy walking access of Metrorail destinations. NPS envisions that service will provide basic visitor orientation by drivers or brochures. Riders will have a choice of additional educational or interpretive services through a range of potential audio/electronic options, including handheld devices or headphone plug-ins at each seat.</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
---------	--	----------

NCPC File No. 6070
Page 18

NPS's preferred alternative does not preclude some route or stop modifications or the potential for pay-per-ride options. NPS intends to make ticketing options as seamless as possible for visitors through the integration of the SmarTrip card with future services.

Vehicles and interpretive materials will be universally accessible. Additional access will be allowed for Segways and electric scooters along the existing trail system on the Mall, as well as on Ohio Drive, SW and Pennsylvania Avenue, NW. When used as a mobility assistive device, Segways and electric scooters are permitted throughout the Mall, including all facilities, sidewalks, and trails. NPS already has a policy of universal access for bicyclists within the parks; improvements in trails will improve conditions for bicyclists.

Recreation

Permitted activities on athletic fields are shown in Figure 5. NPS issues permits for fields or courts. Under a memorandum of agreement with the District of Columbia government, the District also issues permits for field use. NPS regulations restrict use in case of wet grounds, and activities are permitted at the discretion of the superintendent. Activities include softball, soccer, football, kickball, Frisbee, kite flying, rugby, and catch. The fields are well worn and most lack an irrigation system.

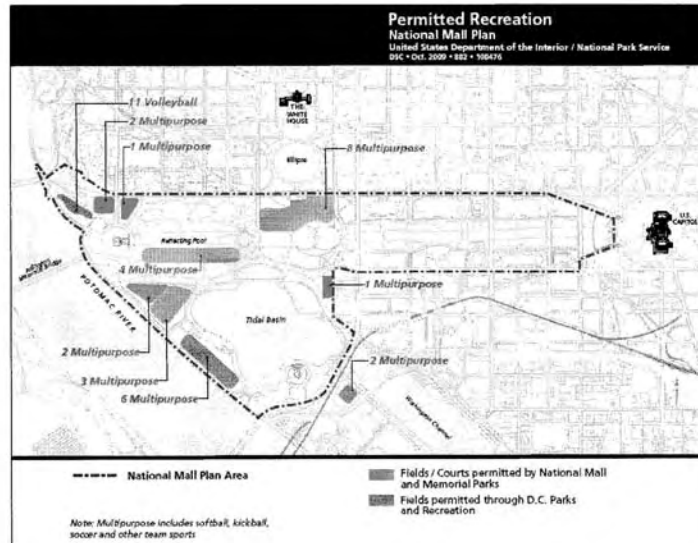


FIGURE 5: Permitted Recreation

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 19</p> <p>The draft Plan proposes improvements to the condition of the soil and turf so that the fields can durably withstand a high intensity of use, thereby increasing capacity for games. The fields are multi-purpose fields, with the intended purpose of allowing flexibility in the scheduling and type of sport played on them. One of the goals of <i>CapitalSpace</i> is to increase capacity for athletic fields in federal and District of Columbia open space.</p> <p>NPS notes that it will continue working with NCPC to mitigate the loss of one multipurpose field for the construction of the Vietnam Veterans Memorial Visitors Center.</p> <p>For passive and informal recreation, the Circulation map indicates proposed improvements in the addition and type of facilities and recreational opportunities, in improved surfaces and separated paths, in more points of access, and in safer conditions for bicycling, walking, jogging, in-line skating, and boating of various kinds. Equipment rentals (including boats, kites, and bicycles) and bicycle racks are proposed at several locations in West Potomac Park.</p> <p>PROJECT ANALYSIS</p> <p>The staff recommends that the Commission comment favorably on the draft National Mall Plan as a well-considered plan that balances equally important requirements for this nationally preeminent public place: the stewardship of the natural and cultural resources of the symbolic, historic landscape and the encouragement and accommodation of public access and use.</p> <p>The National Mall Plan complements the Monumental Core Framework Plan and is one component in the broader planning initiative for the Monumental Core and surrounding urban precincts.</p> <p>The draft Plan constitutes a framework plan for the stewardship and management of visitors to the memorials and open space on the National Mall under the jurisdiction of the National Park Service. It is a framework for future detailed site planning and subsequent project design and implementation. With an approved National Mall Plan, NPS will be in a position to seek funding to begin the fine-grained programming and design that will lead to improvements in the health of natural resources, the appearance of facilities, and access and circulation to and around the Mall.</p> <p>Staff commends NPS for a draft Plan that reflects and responds to comments that the staff has heard in meetings or read in correspondence during the past three years. The draft Plan has benefitted greatly from a high level of local and national engagement and public comment.</p> <p>The National Mall is not only a physical place but a conceptual place, one that Americans respond to with pride and emotion during visits to memorials or participation in demonstrations and events, but also with concern and frustration at the sometimes shabby physical conditions and the dearth of visitor services and amenities of the type that are taken for granted in other public parks or venues.</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 20</p> <p>The Commission's comments and recommendations will assist NPS in further development and refinement of the draft Plan, in the successful and meaningful conclusion of the environmental and historic preservation outcomes, and in the submission of a final National Mall Plan to the Commission that is responsive to recommendations made by the Commission and many others during the current public comment period.</p> <p>The Project Analysis section of this report provides staff comments in support of major proposals in the draft Plan, in the order in which they appear in the Executive Director's recommendations.</p> <p><i>Conservation of Natural Resources</i></p> <p>Staff supports the protection of the character-defining natural resources of the National Mall. Even aside from the historic and symbolic qualities of the Mall, the landscape should be a beautiful and welcoming environment. The health and appearance of the trees and turf lawn of the Mall are high priorities for the National Park Service and the Department of the Interior, and for Congress. NPS undertook comprehensive Mall planning in 2005 in response to public and official concern for the worn appearance of the National Mall. Preservation of the turf and trees through appropriate permitting of special events on the Mall is a responsible and reasonable way to manage these significant natural resources and allow them to recover after heavy use.</p> <p>NPS has long experience in and scientific observation of the care of the elm panels that have led it to recommend that the panels and other parts of the Mall with trees of special status no longer be available for the installation of temporary structures for special events. Special events organizers will continue to use the center panel of the Mall and other "high use" areas such as the Washington Monument Grounds and open space in West Potomac Park (illustrated in the Conservation Zoning Map at Figure 3).</p> <p>Staff recommends that NPS incorporate the research and recommendations of HOK's National Mall Turf Study in its environmental Record of Decision for the National Mall Plan and in the final National Mall Plan itself.</p> <p>While supporting the active use of the National Mall for national festivals and large events that bring visitors to the city and to the Mall, staff notes that the Monumental Core Framework Plan envisions other locations near the Mall and in East Potomac Park for holding national celebrations and events. The Framework Plan recommends landscape improvements to the character and quality of the nearby public spaces (such as 10th Street, SW) and associated improvements to pedestrian and transit connections so that these public spaces will be considered by the public to be desirable, convenient, and inspiring locations for special events. The Framework Plan's recommendations are intended to reduce the heavy demand for <i>special events</i> on the National Mall and to protect the natural and cultural resources of the Mall's historic landscape.</p> <p>NPS's practice of reviewing and issuing permits for <i>First Amendment demonstrations</i> at locations requested by demonstration organizers will continue.</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 21</p> <p><i>Visitor Transportation</i></p> <p>Staff supports the implementation of visitor transportation routes to and through the National Mall that will replace the current tour system. NPS proposes a transportation system with clean fuel vehicles that will run regular, marked routes with transit stops, and that will be linked to other modes such as the DC Circulator, Metrorail, Metrobus, tour buses (parked at Union Station and elsewhere), and bicycle paths and lanes on and near the Mall. While basic orientation will be provided by the driver and brochures or maps, interpretation will be optional and provided by electronic means. The use of handheld devices or plug-in headphones allows interpretation to be flexibly tailored for content, language, and age group. The staff supports NPS's proposal to install parking meters on several of the park roads to produce revenue that can be used to subsidize the cost of the transportation service.</p> <p>NPS has released its decision in a Finding. Important details about the vehicles and the costs still must be developed. Staff recommends that NPS resume discussions with its partners to plan the development of the new system. Staff recommends that the new system be well-linked with transit service, that the fare structure be coordinated and include pay-per-ride options, and that ticketing options be as seamless as possible through integration of the SmarTrip card.</p> <p><i>Improvements in Visitor Amenities</i></p> <p>Insufficient in number, location, type, and quality, current visitor amenities will be overhauled through implementation of the Mall Plan. Staff supports the co-location of food service and restrooms where possible, and the development of multi-purpose facilities at several nodes throughout the National Mall that will provide amenities to visitors and residents. These amenities can include food service, rest rooms, education and information, and entertainment or performances in some venues.</p> <p>Staff agrees with NPS that dispersal of these amenities throughout the Mall, located and designed appropriately, is the correct approach. Suggestions for the reuse of the Smithsonian's Arts and Industries Building as a visitor center for the Mall have been made. Regardless of the fact that the building is currently vacant or that future ideas for the building will be considered by the Smithsonian Institution, the National Mall is two miles long, and visitors should expect to find well-located restrooms, food service, and information within a reasonable walking distance. The proposed multi-purpose facilities have suggested uses in the draft Plan, including food service, restrooms, education and information, and even entertainment or performances in some venues.</p> <p>Furthermore, one of the draft Plan's goals -- and one of the Monumental Core Framework Plan's goals -- is to increase the number of accepted and well-used entry points to the National Mall and the flow of visitors to, through, and throughout the Mall. The comprehensive wayfinding system has been designed with that object in mind. Dispersed locations for amenities, information, and education will encourage the public to visit and experience all parts of the National Mall.</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: center;">NCPC File No. 6070 Page 22</p> <p>Staff strongly supports the development of a facility similar to the National Gallery of Art's Sculpture Garden Pavilion at the east end of Constitution Gardens and recommends that NPS make it an implementation priority. Along with additional proposals for small boating on the lake, the east end of Constitution Gardens has the potential to be a significant contribution to the recreational use and enjoyment of the lake by local residents and visitors.</p> <p><i>Redevelopment of the Capitol Reflecting Pool as Union Square</i></p> <p>Staff considers this draft Plan proposal to be one of the linchpins of the National Mall Plan. The area is now used for both First Amendment demonstrations and permitted special events, but the area is not adequately equipped to support the equipment typically required for large events. The draft Plan proposes providing utilities, public restrooms, food service, and other services so that the east end of the Mall at the foot of the U.S. Capitol can become as attractive in appearance as it is prominent in location. The provision of a public square designed for special events and demonstrations (or designed to be convertible to such uses) will attract groups as well as individual visitors to this prominent location and help reduce wear on the turf and trees of the National Mall.</p> <p>The McMillan Plan's vision of a formal French garden landscape here was never implemented. Some trees from the later Olmsted, Jr. landscape plan of the 1930s do survive at the periphery. In the early 1970s, following the construction of the Center Leg Freeway, the reflecting pool was built over the highway, but the pool was not integrated through a compelling landscape design with the surrounding land managed by the Architect of the Capitol. The Capitol Reflecting Pool provides a beautiful image of the Capitol dome but the area around it can seem austere, shade is insufficient in the summer, and circulation through the site is peripheral. Although the Grant Memorial draws visitors, as does the U.S. Botanic Garden to the south, visitors usually do not linger once they have taken photographs. The area is not commensurate in quality with other areas on the central axis of the National Mall. .</p> <p>The site demands the highest achievement in comprehensive landscape planning, programming, and design. The redevelopment must involve the active participation of the Architect of the Capitol, the National Gallery of Art, the Smithsonian Institution, and the General Services Administration, among others. The American public and the nation's most talented and capable designers must be engaged. NPS intends to do just that, and has suggested that a national design competition would be appropriate for this site. When plans for redesign begin, a public discussion of desirable design qualities and uses (such as the degree of formality, type of water features, location and type of visitor amenities, the nature of the programmed uses) will inform the redesign process.</p> <p>Staff recommends that the redesign and redevelopment of the Capitol Reflecting Pool as Union Square be an early priority and supports a comprehensive design plan of the highest quality, perhaps through a national design competition.</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 23</p> <p><i>Accessibility</i></p> <p>NPS welcomes the opportunity in this Plan to address comprehensively the needs of mobility-impaired visitors to the Mall through the establishment of a convenient central location at the Survey Lodge for courtesy shuttles, electric scooters, and handicap parking. Full accessibility at the west end of West Potomac Park between the Reflecting Pool and the Lincoln Memorial will be provided through the current ARRA-funded rehabilitation project. The draft Plan also recommends paving the gravel paths of the Mall to create a more even and dust-free walking surface. This is a subject that has engaged public opinion and comments for many years. NPS must develop its proposals for the paths in consultation with the public and a range of experts. Staff supports the provision of services and vehicles for visitors needing mobility assistance throughout the Mall, but encourages NPS to fully inform the public as it develops and designs its plans for Mall paths.</p> <p><i>Improvements to the Bicycle Path Network and Athletic Fields</i></p> <p>The National Mall is located at the center or confluence of a regional network of bicycle routes. The draft Plan recognizes the need to add, improve the condition of, and separate bicycle paths for the region's many bicyclists who ride on the Mall for recreation or who commute across the Mall. Placing bicycle racks throughout the Mall, especially near transit nodes, and developing a program for bicycle rental will significantly improve access to the Mall, reduce the intrusion of paved parking lots, and improve the health and appearance of the Mall's natural resources.</p> <p>The public's concern for the appearance of the Mall's turf extends to the athletic fields. Local leagues sometimes experience the poor quality of the fields, and NPS and the District experience difficulties in scheduling games. If the soil is re-engineered so that the fields are more durable, the result will be greater capacity for athletic use, since the fields will recover quickly from high-intensity use.</p> <p>Staff supports the use of the Mall for bicycle circulation on designated and well-designed paths, and the improvement of playing fields so that they will have better appearance and health, and support a greater capacity, which are <i>CapitalSpace</i> goals.</p> <p>The Executive Director noted in his Finding of No Significant Impact for the Vietnam Veterans Memorial Visitor Center that mitigation for the loss of athletic fields on the site of the Center would be required. At the June 4, 2009 meeting, at which the Commission commented on the revised concept design for the Center, the Commission noted that NPS had not yet responded to this requirement. The draft Plan states that NPS will continue to work with NCPC on mitigation.</p> <p><i>The National Mall as a Sustainable Urban Park</i></p> <p>Staff supports NPS's goal for the National Mall as a model of sustainable urban park development, resource protection, and management. The National Mall should be a healthy and beautiful park as well as a symbolic manifestation of our democratic history. Staff recommends</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 24</p> <p>that the final National Mall Plan be amplified to include more specific information about how NPS intends to meet the requirements and goals of the October 5, 2009 Executive Order 13514, Federal Leadership in Environment, Energy, and Economic Performance.</p> <p>NPS summarizes its sustainability goals as follows:</p> <p>Sustainable Water Use – conserve water; reduce use of potable water for large designed water bodies; use non-potable water sources when feasible; capture, store and reuse storm and grey water for irrigation; filter and reuse water; complete the Potomac Park Levee; use a vegetated shoreline for Potomac where feasible, and rely more on natural methods to improve water quality.</p> <p>Resource Health – implement the Sustainable Sites Initiative ©; restore soils and reverse soil compaction; improve tree health and growing conditions; reduce impacts from high use levels; protect special status trees (elm, cherry, and witness trees); preserve or restore plant biomass; and improve ecosystem health.</p> <p>Circulation – facilitate pedestrian activities; use clean alternative fuel sources in visitor transportation; maximize use of public transportation; facilitate multi-modal coordination; separate bicycle routes and offer rentals; use sustainable approaches to walk surfacing to facilitate water reuse.</p> <p>Sustainable Facilities – new facilities should achieve highest LEED standards possible, minimum LEED standard for NPS is silver; reduce energy consumption and seek renewable energy sources; maximize energy efficiency and convert inefficient approaches (LED lighting) facilities; increase recycling, reduce amount of solid waste, and increase use of biodegradable products.</p> <p>Meeting Requirements and Policy – meet Executive Order 13514 - Federal Leadership in Environmental, Energy, and Economic Performance; meet NPS policy and program goals (Climate Friendly Parks; meet minimum LEED silver standards; achieve NPS goals – reduce energy use; reduce greenhouse gases, maximize energy efficiency, improve building envelopes, mechanical systems and glazing).</p> <p>The Executive Director’s recommendations also include a reference to the approved 2003 Olin landscape plan for the grounds of the Washington Monument (Figure 6). The landscape plan called for the planting of hundreds of additional trees to improve the appearance, health, and shade of the Grounds, to complement the revised circulation pattern, and to frame the Grounds and reinforce viewsheds. With the coming National Museum of African American History and Culture, staff has discussed with both SI and NPS staffs the value of fully integrating landscape planning for the Washington Monument Grounds. In light of additional approved or proposed changes to the Washington Monument Grounds, staff recommends that NPS review the Olin landscape plan for continued compatibility and renew efforts to implement it.</p>	

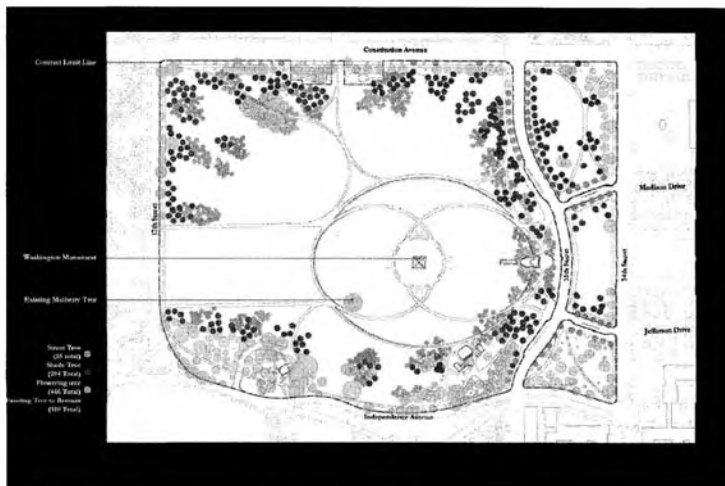


FIGURE 6: Olin Landscape Plan for the Washington Monument Grounds

CONFORMANCE

Comprehensive Plan for the National Capital: Federal Elements

The Comprehensive Plan for the National Capital (Comprehensive Plan) provides goals and policies that guide the Commission in evaluating and acting on plans and projects in the National Capital. By providing improved stewardship of the cultural and natural resources on the National Mall as our nation's symbolic gathering place; by improving the physical conditions and visitor amenities for permitted and informal activities on the National Mall and for active and casual uses; by offering improved education, interpretation, and wayfinding on and beyond the Mall; by expanding circulation paths and modes on the Mall and improving connections to areas around the Mall; and by improving the sustainability of resources and management practices, the draft National Mall Plan supports the three major themes of the Comprehensive Plan:

1. Accommodate federal and national capital activities
2. Reinforce smarter, more coordinated growth
3. Support coordination with local and regional governments

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: center;">NCPC File No. 6070 Page 26</p> <p>The staff finds the draft National Mall Plan to be in conformance with the goals and policies of federal elements of the Comprehensive Plan, as follows.</p> <p><i>Parks and Open Space Element</i></p> <p>The Parks and Open Space Element establishes policies to protect, enhance, and expand the region's parks and open space system. With the adoption of the National Mall Plan, NPS will seek funding for ongoing and future projects to improve amenities, recreation, programs, and access for visitors. Creating paved surfaces and utilities in selected places on the Mall (while an alteration of the current greensward in some locations), and issuing events permits for areas designated for high use, will allow NPS to improve and maintain the health and appearance of the turf lawn and trees. NPS will continue to review and issue permits for First Amendment demonstrations at locations requested by demonstration organizers. The transition to multi-purpose ball fields will allow permitted recreation to continue while maintaining the appearance and unprogrammed use of those areas when ball games are not scheduled.</p> <p><i>Environment Element</i></p> <p>The Federal Environment Element promotes the federal government as an environmental steward and identifies the Commission's planning policies related to the maintenance, protection, and enhancement of the region's natural environment. The draft National Mall Plan identifies measures for the reduction or elimination of potable water for the pools and lake. NPS anticipates that new structures will incorporate geothermal technology, that new paths will be constructed of more sustainable materials and be more permeable, that reengineered soil will improve the health and appearance of the turf and the elms and that they will be maintained with gentler means. Improved transit and bicycling opportunities and, notably, significant improvement in the provision of a central facility and small vehicles for use by visitors who are disabled, will reduce the current dependency on private automobiles to reach and move around the National Mall.</p> <p><i>Preservation and Historic Features Element</i></p> <p>The Preservation and Historic Features Element helps to strengthen the significant architectural and planning character that makes our nation's capital a unique place. The institution of best management practices for the protection of the turf lawn and trees will help NPS achieve its stewardship responsibilities for the preeminent historic landscape. The memorials on the National Mall will continue to be protected and their surrounding open space maintained. Proposed facilities are located away from major viewsheds, and must be designed appropriately. The draft Plan also recommends removing buildings that are close to major viewsheds, such as the facilities at the north side of the Tidal Basin.</p> <p><i>Transportation Element</i></p> <p>The Transportation Element promotes a balanced, multi-pronged strategy to maximize federal employees' and facilities' access to the region's extensive transit system. The continuation and</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 27</p> <p>expansion of a low-cost transportation system to and around the Mall from major transit hubs, improvements in orientation and wayfinding at the Metro station on the Mall and throughout the Mall, and the provision of separate bicycle paths and bicycle rentals on the Mall are encouraged by this element.</p> <p><u>National Environmental Protection Act (NEPA)</u></p> <p>The National Park Service has prepared a draft Environmental Impact Statement (EIS), in which NCPC is participating as a cooperating agency. NCPC is a federal agency with its own NEPA obligations set forth in its Environmental and Historic Preservation Policies and Procedures.</p> <p>NPS's planning documents combine park plans with their Environmental Impact Statements (EIS). The two purposes are combined in one document, the draft National Mall Plan. The Commission is currently reviewing and commenting on the draft Plan within a public comment period. The Executive Director will also respond to the National Park Service with additional comments on the draft EIS. NPS anticipates completing its Environmental Impact Statement and a Record of Decision in the summer of 2010, with submission of the final National Mall Plan for review by the Commission at the September meeting.</p> <p>The draft Plan is referred to as the "Preferred Alternative" in the draft EIS, and is a compilation of proposed actions and focus in the three action alternatives, each of which emphasizes to different degrees the resources and uses of the National Mall. The three alternatives were developed with public input and emphasize focus on: Historic Landscape and Education; Welcoming National Civic Space for Public Gatherings, Events, and High-Level Uses; and Urban Open Space, Urban Ecology, Recreation, and Healthy Lifestyles.</p> <p>Staff concurs with the National Park Service that the Preferred Alternative achieves a balance between the protection of the natural and cultural resources that have come to symbolize and characterize the National Mall and the adaptation of the National Mall to meet current and future needs of all visitors. These may sometimes appear to be at odds and, in the staff's judgment, the draft Plan has carefully considered the need for facilities and amenities while protecting the Mall's well-known historic resources and landscapes, protecting and improving the vistas, reversing the damage to natural resources and improving the health and appearance of the turf lawn and trees. Visitor transportation options will reduce reliance on automobiles. NPS is also committed to making improvements in the health and appearance of its designed water features, water source management, and the incorporation of sustainable materials and practices in the construction of facilities and in its maintenance operations.</p> <p><u>National Historic Preservation Act (NHPA)</u></p> <p>The National Park Service has led consultation with agencies, organizations, and individuals pursuant to Section 106 of the National Historic Preservation Act. The National Mall's component landscapes and its memorials have been listed in the National Register of Historic Places over the years, and the most recent comprehensive listing occurred with the designation of the Plan of Washington in 1996 (the L'Enfant Plan). In addition, NPS has produced Cultural</p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
---------	--	----------

NCPC File No. 6070
Page 28

Landscape Inventories or Cultural Landscape Reports for portions of the National Mall. The map at Figure 7, below, indicates Identified Cultural Landscapes within the National Mall Plan area. NPS acknowledges that more research and analysis should be completed as funds become available for that purpose. Completed documents related to the National Register of Historic Places are available to the public on the National Mall Plan website.

Several consulting parties, including the National Trust for Historic Preservation, have recommended that a comprehensive National Register nomination for the National Mall be prepared, and NPS is considering this as a future step.

The National Mall, however, is a well-known and well-documented site of preeminent national interest and significance for historic events and persons, landscape, and architecture. It's been the subject of much research and scholarship. Many primary sources are available for research, including records in the holdings of federal and District of Columbia agencies; at repositories such as the Library of Congress and the National Archives; and in library, university, and private collections. The Section 106 consulting parties have benefitted from reviewing historic photos of the National Mall that have illustrated the history of the development of the National Mall and how people have used it and enjoyed it in different eras.

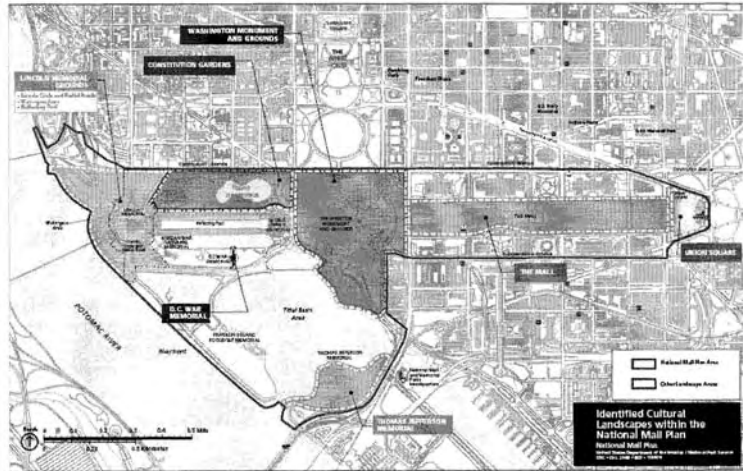


FIGURE 7: Identified Cultural Landscapes within the National Mall Plan

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: center;">NCPC File No. 6070 Page 29</p> <p>NPS invited approximately 60 organizations with an interest in the National Mall plan or historic preservation to be consulting parties under the National Historic Preservation Act section 106 process. In addition to NCPC, the following organizations and agencies responded that they would like to participate: Advisory Council on Historic Preservation, American Civil Liberties Union of the National Capital Area, American Institute of Architects, American Society of Landscape Architects, U.S. Commission of Fine Arts, the Committee of 100 on the Federal City, Cultural Tourism DC, District of Columbia Historic Preservation Office, D.C. Preservation League, Downtown Business Improvement District, Dwight D. Eisenhower Memorial Commission, Equal Honor for All, Friends of the National World War II Memorial, Guest Services, Inc., Guild of Professional Tour Guides, Landmark Services, Inc., Martin Luther King, Jr. National Memorial Project Foundation, Inc., National Association for Olmsted Parks, National Coalition to Save Our Mall, National Mall Conservancy, National Parks Conservation Association, National Trust for Historic Preservation, Organization of American States, Smithsonian Institution, Society of Architectural Historians-Latrobe Chapter, Trust for the National Mall, Washington DC Convention and Tourism Corporation, and the Willard Hotel.</p> <p>Beginning in January 2008, consulting parties met with the National Park Service, the Advisory Council on Historic Preservation, and the D.C. Historic Preservation Office to examine the ramifications of planning alternatives on cultural landscapes, the NPS List of Classified Structures, historic districts, on sites listed in or eligible for listing in the National Register of Historic Places. The consultation process is ongoing, and at least 10 meetings or opportunities to participate were held by April 1, 2009. A bus tour was provided in May 2007 to familiarize participants with planning issues. Background materials, maps, and studies were posted on the website and handed out at meetings. Consulting parties provided comments in April 2008 on the range of alternatives, to which NPS responded.</p> <p>Commission staff has participated in NPS meetings with consulting parties at each phase of the Plan's development, particularly in the spring of 2008 and the spring 2009. Last year NPS introduced a pre-Draft Preferred Alternative, for which consulting parties provided detailed comments on anticipated effects to historic built and landscape features and vistas. Staffs of the District of Columbia State Historic Preservation Office (DC SHPO) and the Advisory Council on Historic Preservation (ACHP) have participated fully in the meetings and have met with NPS to consider the content of a future Programmatic Agreement that will address the potential for effects to historic resources and how to proceed with further Section 106 consultation in the implementation of individual projects after the draft Plan is revised and finalized later this year.</p> <p>Staff emphasizes again that the Plan is a long-range framework for potential future improvements and development. NPS will implement the Plan as funding permits in future years. Almost all of the individual projects will be the subject of further Section 106 consultation. It's not possible to determine conclusively at this time if any of the projects will have an adverse effect or not, but the DC SHPO has asked that a Programmatic Agreement be developed to make clear the future public process for consultation on determining effects and how to avoid or minimize them.</p> <p><i>Table 41 from the draft Plan, below, lists the many potential projects envisioned in the National Mall Plan and notes where further historic preservation consultation and compliance will likely</i></p>	

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response																																																																				
	<p style="text-align: right;">NCPC File No. 6070 Page 30</p> <p><i>be required. This Table is also a useful summary of the projects that may result from implementation of the National Mall Plan.</i></p> <p style="text-align: center;">TABLE 41: ACTIONS REQUIRING ADDITIONAL COMPLIANCE UNDER THE NATIONAL HISTORIC PRESERVATION ACT, SECTION 106</p> <p>Highlighted areas require additional compliance.</p> <table border="1" data-bbox="485 532 884 1260"> <thead> <tr> <th colspan="2" style="text-align: center;">Ongoing NPS Actions</th> </tr> </thead> <tbody> <tr> <td>Rehabilitate Lincoln Reflecting Pool, pave elm walkways, complete security perimeter</td> <td style="text-align: center;">Yes, ongoing</td> </tr> <tr> <td>Complete Thomas Jefferson security perimeter</td> <td style="text-align: center;">Yes, ongoing</td> </tr> <tr> <td>Construct Vietnam Veterans Memorial Center</td> <td style="text-align: center;">Yes, ongoing</td> </tr> <tr> <td>Construct Martin Luther King, Jr. Memorial</td> <td style="text-align: center;">Yes, ongoing</td> </tr> <tr> <td>Replace sign system</td> <td style="text-align: center;">Yes, ongoing</td> </tr> <tr> <td>Washington Monument security screening</td> <td style="text-align: center;">Yes, ongoing</td> </tr> <tr> <td>Renovate Lincoln Memorial restrooms, relocate bookstore, and rehabilitate / replace exhibits</td> <td style="text-align: center;">No, not needed</td> </tr> <tr> <td>Rehabilitate D.C. War Memorial and restore grounds</td> <td style="text-align: center;">No, not needed</td> </tr> <tr> <td>Correct problems at Thomas Jefferson plaza</td> <td style="text-align: center;">No, not needed</td> </tr> <tr> <th colspan="2" style="text-align: center;">National Mall Actions</th> </tr> <tr> <td>Develop coordinated palette of paving materials, crosswalks, and site furnishings*</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Develop bike routes</td> <td style="text-align: center;">Yes</td> </tr> <tr> <th colspan="2" style="text-align: center;">Specific Areas</th> </tr> <tr> <th colspan="2" style="text-align: center;">Union Square</th> </tr> <tr> <td>Redesign Union Square</td> <td style="text-align: center;">Yes</td> </tr> <tr> <th colspan="2" style="text-align: center;">Mall</th> </tr> <tr> <td>Develop welcome plaza / 12th Street corridor</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Rehabilitate soil, grass, irrigation for center panels</td> <td style="text-align: center;">No</td> </tr> <tr> <td>Install curbs, protection for elm tree panels</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Provide restrooms</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Provide civic infrastructure</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Pave walkways, enhance pedestrian environments*</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Provide additional lighting</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Install parking meters / kiosks</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Provide underground parking garage</td> <td style="text-align: center;">Yes</td> </tr> <tr> <th colspan="2" style="text-align: center;">Washington Monument</th> </tr> <tr> <td>Construct visitor facility / multipurpose facility</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Provide civic infrastructure (utilities, etc.)</td> <td style="text-align: center;">Yes</td> </tr> <tr> <th colspan="2" style="text-align: center;">World War II Memorial</th> </tr> <tr> <td>Relocate Lockkeeper's House</td> <td style="text-align: center;">No</td> </tr> <tr> <th colspan="2" style="text-align: center;">Constitution Gardens</th> </tr> <tr> <td>Relocate Lockkeeper's House</td> <td style="text-align: center;">Yes</td> </tr> <tr> <td>Construct multipurpose area or food service facility</td> <td style="text-align: center;">Yes</td> </tr> </tbody> </table>	Ongoing NPS Actions		Rehabilitate Lincoln Reflecting Pool, pave elm walkways, complete security perimeter	Yes, ongoing	Complete Thomas Jefferson security perimeter	Yes, ongoing	Construct Vietnam Veterans Memorial Center	Yes, ongoing	Construct Martin Luther King, Jr. Memorial	Yes, ongoing	Replace sign system	Yes, ongoing	Washington Monument security screening	Yes, ongoing	Renovate Lincoln Memorial restrooms, relocate bookstore, and rehabilitate / replace exhibits	No, not needed	Rehabilitate D.C. War Memorial and restore grounds	No, not needed	Correct problems at Thomas Jefferson plaza	No, not needed	National Mall Actions		Develop coordinated palette of paving materials, crosswalks, and site furnishings*	Yes	Develop bike routes	Yes	Specific Areas		Union Square		Redesign Union Square	Yes	Mall		Develop welcome plaza / 12th Street corridor	Yes	Rehabilitate soil, grass, irrigation for center panels	No	Install curbs, protection for elm tree panels	Yes	Provide restrooms	Yes	Provide civic infrastructure	Yes	Pave walkways, enhance pedestrian environments*	Yes	Provide additional lighting	Yes	Install parking meters / kiosks	Yes	Provide underground parking garage	Yes	Washington Monument		Construct visitor facility / multipurpose facility	Yes	Provide civic infrastructure (utilities, etc.)	Yes	World War II Memorial		Relocate Lockkeeper's House	No	Constitution Gardens		Relocate Lockkeeper's House	Yes	Construct multipurpose area or food service facility	Yes	
Ongoing NPS Actions																																																																						
Rehabilitate Lincoln Reflecting Pool, pave elm walkways, complete security perimeter	Yes, ongoing																																																																					
Complete Thomas Jefferson security perimeter	Yes, ongoing																																																																					
Construct Vietnam Veterans Memorial Center	Yes, ongoing																																																																					
Construct Martin Luther King, Jr. Memorial	Yes, ongoing																																																																					
Replace sign system	Yes, ongoing																																																																					
Washington Monument security screening	Yes, ongoing																																																																					
Renovate Lincoln Memorial restrooms, relocate bookstore, and rehabilitate / replace exhibits	No, not needed																																																																					
Rehabilitate D.C. War Memorial and restore grounds	No, not needed																																																																					
Correct problems at Thomas Jefferson plaza	No, not needed																																																																					
National Mall Actions																																																																						
Develop coordinated palette of paving materials, crosswalks, and site furnishings*	Yes																																																																					
Develop bike routes	Yes																																																																					
Specific Areas																																																																						
Union Square																																																																						
Redesign Union Square	Yes																																																																					
Mall																																																																						
Develop welcome plaza / 12th Street corridor	Yes																																																																					
Rehabilitate soil, grass, irrigation for center panels	No																																																																					
Install curbs, protection for elm tree panels	Yes																																																																					
Provide restrooms	Yes																																																																					
Provide civic infrastructure	Yes																																																																					
Pave walkways, enhance pedestrian environments*	Yes																																																																					
Provide additional lighting	Yes																																																																					
Install parking meters / kiosks	Yes																																																																					
Provide underground parking garage	Yes																																																																					
Washington Monument																																																																						
Construct visitor facility / multipurpose facility	Yes																																																																					
Provide civic infrastructure (utilities, etc.)	Yes																																																																					
World War II Memorial																																																																						
Relocate Lockkeeper's House	No																																																																					
Constitution Gardens																																																																						
Relocate Lockkeeper's House	Yes																																																																					
Construct multipurpose area or food service facility	Yes																																																																					

Comment

Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)

Response

NCPC File No. 6070
Page 31


Rehabilitate lake	No
Rehabilitate / redesign walk areas*	Yes
Remove / rehabilitate concession facility	Yes
Vietnam Veterans Memorial	
Rehabilitate existing walkways; provide seating	Yes
Lincoln Memorial	
Add restroom near south concession stand	Yes
Korean War Veterans Memorial	
Revise walks	Yes
Ash Woods	
Replace / relocate restroom	Yes
Replace USPP stables / add new road entry	Yes
Potentially add new concession facility	Yes
Revise road/walks*	Yes
Tidal Basin Area	
Rebuild Tidal Basin walls, widen walks and bridges, and provide pedestrian amenities*	Yes
Install pedestrian lighting	Yes
Provide concession food service / restrooms	Yes
Provide new recreation equipment rental facility	Yes
Provide bike lanes	Yes
West Potomac Park Riverfront Area	
Add bike lanes	Yes
Rehabilitate shoreline	Yes
Redesign parking	Yes
Add walks	Yes
George Mason Memorial	
Rehabilitate Fountain 4	No
Franklin Delano Roosevelt Memorial	
Potentially provide concession facility	Yes
Improve ballfields	No
Thomas Jefferson Memorial	
Provide civic infrastructure	Yes
Add restroom	Yes
Provide concession facility	Yes

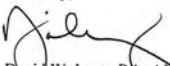
CONSULTATION


Coordinating Committee

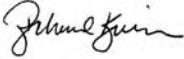
NPS, the author of the draft National Mall Plan, is a member of the Coordinating Committee, which coordinated the draft National Mall Plan for the March 4 meeting. All of the other member agencies are either cooperating agencies for purposes of review under the National Environmental Policy Act or have participated in the planning process for the draft Plan. In addition to consulting with federal and District agencies throughout the development of the draft Plan, NPS released hard and electronic copies of the draft Plan to the agencies in December and invited their comments during this 90-day public comment period. The other Coordinating Committee member agencies are: NCPC, the General Services Administration (GSA); the District of Columbia Office of Planning and Department of Transportation; and the Washington Metropolitan Area Transit Authority.

Comment	Letter 6.1. National Capital Planning Commission, Staff Recommendation (cont.)	Response
	<p style="text-align: right;">NCPC File No. 6070 Page 32</p> <p><u>Consultation and Coordination with other agencies</u></p> <p>In April 2006 the National Park Service invited the following federal and D.C. agencies to cooperate in the preparation of a National Mall Plan: Advisory Council on Historic Preservation, Architect of the Capitol, D.C. Department of Transportation, D.C. Office of Planning, D.C. Historic Preservation Office, The Federal Reserve Bank, General Services Administration, National Archives, National Capital Planning Commission, National Gallery of Art, Smithsonian Institution, U.S. Bureau of Engraving and Printing, U.S. Commission of Fine Arts, U.S. Department of Agriculture, U.S. Holocaust Memorial Museum, U.S. Park Police, U.S. Secret Service, Department of Homeland Security, and the Washington Area Metropolitan Transit Authority.</p> <p>The agencies contributed to the development of goals and planning principles for the National Mall Plan, which were shared with the public on the project website.</p> <p><u>U.S. Commission of Fine Arts</u></p> <p>The staff of the Commission (CFA) has participated in public meetings and Section 106 consultation on the draft Plan as it was being developed. CFA commissioners commented favorably on the draft Plan at its February 18, 2010 meeting, asking questions in particular about NPS's plans for improving the sustainability of new facilities on the National Mall. The Commission's letter will be provided after it is made available by CFA.</p>	

Comment	Letter 6.2. National Capital Planning Commission	Response
<p>A</p> <p>B</p> <p>C</p>	 <p data-bbox="464 342 1094 358">401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel 202.482.7200 Fax 202.482.7272 www.ncpc.gov</p> <p data-bbox="331 431 480 472">In Reply Refer To: NCPC File No. 7060</p> <p data-bbox="331 488 447 508">March 18, 2010</p> <p data-bbox="331 526 594 643">Ms. Susan Spain Project Executive, National Mall Plan National Mall and Memorial Parks National Park Service 900 Ohio Drive, SW Washington, DC 20024-2000</p> <p data-bbox="331 662 888 683">Re: Comments on Draft Environmental Impact Statement, National Mall Plan</p> <p data-bbox="331 699 447 719">Dear Ms. Spain:</p> <p data-bbox="331 740 1050 813">The National Capital Planning Commission (NCPC) reviewed the draft National Mall Plan at its March 4, 2010 meeting and voted to approve the Executive Director's Recommendation for comments on the draft Plan. The Commission's comments have been mailed to the National Park Service (NPS) under separate cover.</p> <p data-bbox="331 834 1050 875">The following observations and recommendations are additional, staff comments on the draft Environmental Impact Statement (draft EIS).</p> <p data-bbox="331 894 1050 1027">We commend the National Park Service for producing a draft EIS that reflects extensive public scoping and consultation and that contains a broad range of alternatives. The draft EIS is a significant advancement on the earlier draft document we reviewed; we appreciate reading a document that is responsive to our earlier comments and well-written and well-illustrated. We look forward to a final Plan and Record of Decision that incorporate the recommendations of the Commission and Executive Director. We conclude that the document will be sufficient for NCPC's use in complying with the National Environmental Policy Act.</p> <p data-bbox="331 1047 1050 1180">The draft EIS incorporates information and goals from other planning documents recently completed or now underway for the Monumental Core. In particular, we appreciate the map indicating cumulative projects planned for the area. We recommend that the projects on that map, combined with other major projects with site approvals on National Park Service land, be illustrated to the extent feasible on the Preferred Alternative map. That map—a development guide for the National Mall—will be the most referenced page in the EIS after it is completed and should illustrate all of the known development projects.</p> <p data-bbox="331 1200 1050 1320">The Monumental Core Framework Plan Opportunities map could benefit from further development, especially in indicating points of access to the National Mall and connections between the National Mall and adjacent areas. The legend on this map should include the area indicated in yellow near the Jefferson Memorial. Similarly, the Urban Design Framework map could note secondary vistas such as those from the Vietnam Veterans Memorial and the potential for axial views northward from the District of Columbia War Memorial. Since the design of the Martin Luther King, Jr. National Memorial is</p>	<p data-bbox="1142 1057 1629 1078">A. Maps have been revised as explained in response 6.1A.</p> <p data-bbox="1142 1170 1906 1192">B. Changes have been made to the Monumental Core Framework Plan Opportunities map.</p> <p data-bbox="1142 1219 1869 1240">C. Additional secondary vistas have been added to the Urban Design Framework map.</p>

Comment	Letter 6.2. National Capital Planning Commission (cont.)	Response
	<p>Page 2 – Ms. Spain</p> <p>D established, key vistas and symbolic connections to and from the memorial could be made. We also recommend that many more of the side yards of the museums of the Smithsonian Institution be considered in the category “gardens/sculpture gardens.” Doing so would allow opportunities for further analysis of the character and value of these gardens, not only to the character of the National Mall but in furtherance of Framework Plan concepts and goals for linking open space.</p> <p>E We recommend that the final Plan and Record of Decision make clear the importance of the National Mall for passive and active recreation for District of Columbia and regional residents as well as visitors. A map that combined the playing fields with the range of recreational opportunities indicated on other maps (from biking and jogging paths to canoeing and model boats) would illustrate the importance of the National Mall to the open space park system of the Monumental Core and city.</p> <p>F We suggest that NPS continue to maintain the very informative and useful public website for the National Mall Plan after it is adopted and throughout implementation. The documents currently posted on the website, including historic resource documentation, natural resource management reports, transportation and visitor studies, and photographs illustrating the development of the National Mall over time, are easy to find and access. Your website can continue to be the authoritative source for current and new documents and information.</p> <p>G We suggest posting the eventual National Mall Plan map (currently called the Preferred Alternative Map) and the Circulation Map on the website and updating them periodically as projects on the National Mall are implemented and relevant projects in adjacent areas are developed. We encourage continued discussions with our staff and others about ways to keep the National Mall Plan’s progress current and easily available to the public.</p> <p>H In preliminary discussions on the content of a future Programmatic Agreement with the District of Columbia State Historic Preservation Office, you and other Park staff have proposed writing a National Register nomination for the National Mall. We support this initiative. We also support use of the design principles in Newsletter #2 as a basis for the Programmatic Agreement and for moving forward with consultation, design development, and implementation of individual undertakings.</p> <p>I Thank you for this opportunity to comment further. We look forward to participating with NPS and other entities as well as the public in realizing the goal of making the National Mall a model urban park befitting our Nation’s Capital for the preservation of natural and cultural resources, provision of welcoming visitor amenities, sustainable management, education, and recreation. If you have any questions regarding these comments, please contact Nancy Witherell at (202) 482-7239 or nancy.witherell@nps.gov.</p> <p>Sincerely,</p>  <p>David W. Levy, RA, AICP Director, Urban Design and Plan Review</p>	<p>D. Secondary vistas have been added to the Urban Design Framework map.</p> <p>E. The Permitted Recreation map (DEIS, p. 331) has been revised to show additional opportunities, and the title has been changed to Recreational Opportunities.</p> <p>F. Your suggestion will be taken under consideration since it may be helpful in the future.</p> <p>G. Your suggestion seems appropriate. The intent is to prepare a summary plan once a record of decision has been signed, and that plan would only include the proposed actions.</p> <p>H. We agree; see response 1.A.</p> <p>I. The design principles have been updated and added to the <i>Final Environmental Impact Statement</i> as appendix F.</p>

Comment	Letter 7. Smithsonian Institution	Response
<p>A</p> <p>B</p>	 <p>Smithsonian Institution Dr. Richard Kurin Under Secretary for History, Art, and Culture</p> <p>DRAFT NATIONAL MALL PLAN & ENVIRONMENTAL IMPACT STATEMENT</p> <p>COMMENT BY THE SMITHSONIAN INSTITUTION</p> <p>As a resident of the National Mall for more than 160 years and a long-time partner of the National Park Service, the Smithsonian Institution applauds the work being done to plan for the National Mall's future. We appreciate the opportunity to comment on the Draft National Mall Plan and Environmental Impact Statement. The Mall between 3rd and 14th Streets is our "front yard" and as such we share the concerns about its condition and its future.</p> <p>The Smithsonian has actively participated in the National Park Service's planning meetings and has provided comments as a cooperating agency in the NEPA process. We envision the National Mall as an integrated part of the Washington, D.C. landscape that attracts diverse audiences to what is the most symbolically significant space for public expression in the United States. From the Rev. Martin Luther King's "I Have A Dream" speech during the March on Washington to the Inauguration of President Obama, from the various gatherings and demonstrations to the annual celebrations of our Independence and our living cultural heritage, the Mall is our national town square. We believe the history of the Mall and its place in our national consciousness calls for a bold, forward-looking plan. It is our opinion that this Draft Plan, while admirable in large part, falls short on several counts.</p> <p>First, the plan focuses on the Mall as parkland. It does not explore ways in which surrounding museums, businesses, and agencies interact with the greensward and thus might more effectively contribute to public life on the National Mall. The NPS-conducted visitor survey by its own terms was designed to assess the National Mall as a separate entity from the museums and attractions in the area. Assessing the Mall in isolation from its surroundings leads to a foregone conclusion that the Mall should become a landscape, rather than incorporating any opportunities for its use as an active, educational space.</p> <p>Second, we are concerned that the conclusions in the plan have been reached without careful scientific study and analysis, contrary to the President's directive stating that public policy decisions should be based on sound science. Absent a systematic study of events on the Mall and their impacts, or lack thereof, the plan seeks to protect the Mall's landscape by limiting all events, rather than striving for a balance between use and preservation. Without up to date studies regarding turf and trees on the Mall, conclusions and</p> <p>Smithsonian Castle 1000 Jefferson Drive, SW, Art Room 219 MRC 040 PO Box 37012 Washington DC 20013-7012 (202) 633-5240 Telephone (202) 357-7031 Fax kurin@si.edu Email</p>	<p>A. The proposed National Mall plan seeks to balance use and preservation, as mandated by the NPS Organic Act. We agree that the National Mall is an important public space, and we have sought to develop a plan that considers the needs of all agencies responsible for adjacent areas, including the Smithsonian Institution, the National Gallery of Art, the Architect of the Capitol, and the U.S. Department of Agriculture.</p> <p>B. Additional data about events have been added to the <i>Final Environmental Impact Statement</i>. The National Park Service mapped 2009 permitted events (except the Presidential Inauguration) with an estimated total volume of use of more than 1,000. Areas of use, seasons of use, and use-days are shown. This information has been added to the "Affected Environment." A table has also been developed for 2008/2009 events based on permit applications.</p> <p>As stated in the document, nine studies of soil conditions conducted since 1975 (see DEIS, p. 298) and the draft "Elms of the Monumental Core" (2009) recommend that passive use and general enjoyment activities are appropriate activities under elm trees; one study did not support this conclusion. The 2009 report and the <i>Management Program for the Perpetuation of the American Elm Tree in the National Capital</i> (Save-the-Elms Task Force 2007) have been added to the bibliography. The National Park Service is currently working with a consultant, HOK, to study ways to restore the Mall turfgrass panels. In addition, the National Park Service will be undertaking an additional peer-reviewed scientific study to examine the health of elm trees, soil conditions, and appropriate levels of use and protection. We would be happy for the Smithsonian Institution to join this effort.</p>

Comment	Letter 7. Smithsonian Institution	Response
<p>C</p> <p>D</p>	<p>March 18, 2010 Page 2</p> <p>prohibitions are assumed that are likely unwarranted. We agree wholeheartedly that the National Mall needs to be better maintained, but believe that there are means by which the Mall's turf, walkways, and infrastructure can be restored and maintained without compromising the welcoming, democratic cultural values of this important public space.</p> <p>Third, the Draft National Mall Plan lacks an implementation plan which provides a logical sequence or prioritization of projects. While the Smithsonian is well aware of the vagaries of funding, we believe that it is essential to detail how the National Park Service proposes to order its work and how long it may take to complete.</p> <p>While the Smithsonian applauds many aspects of the plan, including the redevelopment of Union Square and incorporation of the Sustainable Sites Initiative, we encourage the National Park Service to call upon the expertise that exists in other agencies, including the Smithsonian, and also within the private sector, prior to issuing the plan. In particular, we ask that you reconsider that portion of the plan that prohibits use of the elm tree panels for temporary events (Page xi of the Plan). In our opinion this prohibition is not justified, and will seriously diminish the public's enjoyment of important national celebrations, and limit the public use and enjoyment of the Mall.</p> <p>The Smithsonian Institution has successfully collaborated with the National Park Service for generations and we look forward to renewing that collaborative spirit in order to forge a vibrant future for the National Mall. Again thank you for providing this opportunity to comment on the Draft Plan.</p> <p>On behalf of the Smithsonian Institution</p>  <p>Richard Kurin Under Secretary for History, Art, and Culture</p>	<p>C. A priority listing of projects will be included in either a record of decision, a programmatic agreement with the Advisory Council on Historic Preservation and the D.C. Historic Preservation Office under NHPA section 106, or in an appendix to these documents. Since approval of the plan does not ensure funding, the priorities will be used to guide NPS funding requests. At the same time, the need is so large that all funding opportunities must be explored.</p> <p>D. Please see response B to your letter.</p>

U.S. COMMISSION OF FINE ARTS

ESTABLISHED BY CONGRESS 17 MAY 1910
 401 F STREET NW SUITE 312 WASHINGTON DC 20001-3728 202-504-2200 FAX 202-504-2195 WWW.CFA.GOV

26 February 2010

Dear Ms. O'Dell:

In its meeting of 18 February, the Commission of Fine Arts reviewed the draft of the *National Mall Plan*, commending the National Park Service (NPS) on its continuing work. The Commission expressed overall support for the initiative and offered several recommendations as NPS continues to develop the plan. The Commission encouraged NPS in its efforts to preserve the qualities that make the Mall a place for national pilgrimage and calm reflection, commenting on the importance of balancing carefully the need to accommodate innumerable events and activities on the Mall with the need to maintain its dignity and beauty.

In their discussion, the Commission members supported the effort to promote a healthy and sustainable ecosystem for the Mall. They recommended reducing the amount of potable water used in the Mall's water features and suggested that NPS consider using solar energy to provide power for lighting within this historic landscape, perhaps sponsoring a design competition to develop a new solar-powered light fixture. The Commission strongly recommended further consideration of using compacted gravel and stone dust for the Mall's walks; if correctly built, such walks provide effective surfaces with limited maintenance. The Commission also encouraged further development of visitor mobility and transit options on the Mall, and urged NPS to undertake decisive action to rehabilitate the Mall's central lawn panels.

The Commission looks forward to future presentations of the *National Mall Plan* and individual design proposals, such as the possible redesign of Union Square and the rehabilitation of the Mall walkways. As always, the staff is available to assist you with future submissions.

Sincerely,



Thomas E. Luebke, AIA
Secretary

Margaret O'Dell, Regional Director
National Park Service, National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242


cc: Peter May, National Park Service

- A. We appreciate your support for a healthy ecosystem and sustainable approaches proposed in the National Mall plan.
- B. A reduction in the use of potable water for both irrigation and within designed water features has been proposed. This will require a comprehensive and ongoing examination.
- C. Considering solar power for lighting needs is included in the *Draft Environmental Impact Statement* (pp. 88 and 190, actions for row 9.5), and we appreciate the interesting suggestion of a design competition to develop a new solar-powered light fixture. The plan also proposes that sustainable power sources might be located adjacent to the National Mall.
- D. We understand that commission members feel strongly that compacted gravel or stone dust is an appropriate material for surfacing pathways, and we want to assure them that the proposal to remove gravel from the walkways was not made lightly.

As you know, one of the planning goals is for the National Mall to be a showcase of sustainable design, and the National Park Service is highly interested in sustainable approaches to paving materials. There are many ways to approach sustainability. In this case we feel that paving can be sustainably used to maximize rainwater capture for reuse in irrigation. (See response F below.)

As a result of public comments, the issue related to compacted gravel or stone dust was reexamined. The present compacted gravel pathways are not permeable since they were placed over former roadbeds. Claims that gravel walkways require limited maintenance are counter to 40 years of experience by NPS crews trying to maintain the pathways. Maintenance problems are further exacerbated by high use levels as well as vehicles being driven on pathways for both maintenance and permitted events. Constant gravel migration results in humps and depressions, and snow cannot be removed without digging into the gravel. Locations where stone dust or gravel has been successfully used do not have the same levels of use by pedestrians or heavy vehicles as the National Mall. Please see the discussion of gravel walkways under "Summary of Comments and Responses" (beginning on page 12) for more information.

- E. The *Visitor Transportation Study* was completed February 5, 2010, with the signing of the "Finding of No Significant Impact." Discussions have started with potential public transportation partners.
- F. The National Park Service has begun to take "decisive action to rehabilitate the Mall's central turfgrass panels." A consultant design team with expertise in sports field development is starting designs to restore the central turfgrass panels. The approach will remove soil to a depth of about 2 feet and replace it with a compaction-resistant but drainable soil system. Turf panels would be crowned for good drainage, as they were in the 1930s in accordance with designs by Frederick Law Olmsted Jr. The project includes the development of a durable irrigation system that would reuse captured rainwater stored in underground cisterns for irrigation. The system would have the capacity to capture and store water from surrounding resources, such as groundwater currently being removed from tunnels under the National Mall. This sustainable approach would help meet the requirements of Executive Order 13514 ("Federal Leadership in Environmental, Energy, and Economic Performance") to reduce the use of potable water by 26% by 2020. This is an important goal because the National Mall is the highest user of potable water within the national park system. Upon completion of the sidewalk plan, water collection and reuse of rainwater would be maximized.

Comment	Letter 9. U. S. Environmental Protection Agency, Region III	Response
	<div data-bbox="338 298 447 402" data-label="Image"> </div> <div data-bbox="478 285 896 358" data-label="Text"> <p>UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029</p> </div> <div data-bbox="625 397 747 418" data-label="Text"> <p>March 15, 2010</p> </div> <div data-bbox="344 457 600 561" data-label="Text"> <p>Ms. Susan Spain, Project Executive The National Mall Plan National Mall & Memorial Parks 900 Ohio Drive, S.W. Washington, D.C. 20024</p> </div> <div data-bbox="340 579 1012 625" data-label="Text"> <p>Re: National Mall Plan, To Prepare a Long-Term Plan that will Restore National Mall, Implementation, Draft Environmental Impact Statement, Washington, D.C. (CEQ #20090432)</p> </div> <div data-bbox="340 641 464 664" data-label="Text"> <p>Dear Ms. Spain:</p> </div> <div data-bbox="340 682 1024 768" data-label="Text"> <p>In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1509), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the National Mall Plan in Washington, D.C.</p> </div> <div data-bbox="340 784 1029 951" data-label="Text"> <p>The National Mall covers approximately 684 acres and each year the National Park Service (NPS) receives over 6,000 applications for public gathering permits, resulting in around 3,000 events. In one year (2008), for instance, the National Mall received approximately 22.3 million visits. The purpose and need for the proposed action is to develop a long-term plan that will restore the National Mall so that it may continue to symbolize the ideals and greatness envisioned for the United States of America. The approved plan will be followed by site-specific implementation plans including additional compliance with the NEPA and National Historic Preservation Act (NHPA), as needed.</p> </div> <div data-bbox="340 967 1024 1172" data-label="Text"> <p>The DEIS examines five alternatives for the management of the National Mall in Washington, D.C. They are: the No-Action Alternative which would continue current conditions; Alternative A would focus on the historic landscape with its memorials and planned vistas; Alternative B would focus on creating a welcoming national civic space for public gatherings, events, and high-use levels; Alternative C would focus on urban recreation and use plus a sustainable urban ecology; and the Preferred Alternative which combines ideas from all of the other alternatives considered. It would establish a sense of place and an overall identity for the National Mall, creating a coherent pedestrian environment that would complement and balance the natural environment, formal and informal features, and national commemorative works.</p> </div> <div data-bbox="340 1243 989 1286" data-label="Text"> <p> Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474</p> </div>	

In general, the Preferred Alternative would involve refurbishing the premier civic space so that very high levels of use could be perpetuated and the needs of visitors met in an energy-efficient and sustainable manner. Its memorials and landscapes would be protected, with large areas of open space as defining features of the historic landscape. Lawns and elm trees would be improved and protected. Compacted soils would be removed and replaced with engineered soils capable of better withstanding intensive use. Visitor amenities would be added throughout the Mall including the addition of a multipurpose facility to include food service, restrooms, education exhibits, information, a book store, retail, recreation equipment rentals (model boats, portable lawn chairs). Pedestrian circulation would be improved including constructing separate bicycle and pedestrian trails and redesigning the tour bus drop-off area, widening walkways, and paving gravel walkways. The Preferred Alternative would incorporate additional recreational opportunities and improved playing fields, more shaded seating, additional pedestrian lighting, and an emergency notification system. In addition, the Tidal Basin seawalls would be rebuilt; a vegetated shoreline would be established along the Potomac River. The lake at Constitution Gardens would be rebuilt to be self-sustainable, with potentially a nonpotable, sustainable water source. A small reflecting pool is considered at Union Square which may be constructed for various uses.

EPA supports the purpose and need for the proposed action and the Preferred Alternative. However, as a result of our review of the DEIS, EPA developed comments and questions (presented in the attached Technical Comments). Specific concerns are expressed regarding water resources, fish and wildlife, and soils; in particular impacts to habitat in the Tidal Basin. EPA rated the DEIS an EC-2 (Environmental Concerns/Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of the EPA's rating system is enclosed for your information.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,





Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs


Enclosures (4)

A

A. Specific concerns are addressed below.

Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
	<p style="text-align: center;">Technical Comments</p> <p><u><i>Water Resources</i></u></p> <p>It is stated on page 392, "...under the preferred alternative nonpotable water sources would be used in ornamental features where feasible..." EPA commends the NPS for its plan to seek sustainable water use and reuse of graywater. It is suggested that if a specific water quality standard for graywater is required for the ornamental features that it be stated and the process for adhering and managing the standard is specified in the FEIS. (Is signage required to identify graywater for awareness purposes especially since children are inclined to expose themselves to the water in ornamental features? If not required, it may be a tool to emphasize the NPS's approach to seeking sustainable water which would also serve to inform the public of the type of water used within the ornamental features.)</p> <p>The NPS plans to rebuild the Tidal Basin seawalls and widen the walkways. Widening the walkways could require moving the basin wall into the basin, resulting in the loss of about 5 acres of warm and shallow water habitat used by fish and other aquatic organisms. The Tidal Basin is 107-acres and is 6-foot-deep. The water is slightly brackish due to tidal inflows from the Chesapeake Bay and supports a variety of native and nonnative fish. The FEIS should specify the rationale for selecting fill as the NPS option and discuss other alternatives that may have been analyzed.</p> <p>The water quality of the Tidal Basin was not discussed; however, as noted in the comment below under Fish and Wildlife it would be reasonable to assume that the water quality of the Tidal Basin is influenced by the Potomac River which may have PCBs and other chemical contaminants. The FEIS should specify the water quality of the Tidal Basin. In addition, construction of the seawall could result in increased levels of sediment being released into the water. The use of appropriate erosion and sediment control measures would prevent the sediment from reaching the Tidal Basin. To ensure that appropriate measures are used for the installation of the seawall, a description and discussion of the specific erosion and sediment control measure(s) should be identified.</p> <p>In addition, EPA encourages coordination with the Baltimore District U.S. Corps of Engineers to discuss the necessity of permitting requirements for work in the Tidal Basin.</p> <p>The Cumulative Impacts section on page 393 does not reference the NPS's proposal to consider rehabilitating the water system for the Lincoln Reflecting Pool. Also, the DEIS does not mention the Environmental Assessment to Repair and Control Settlement at Thomas Jefferson Memorial Seawall. The impacts on water resources in combination with those water-related projects proposed for the National Mall should be discussed. It is suggested that the FEIS reflect these projects and state why they are addressed separately and not included in the National Mall Plan.</p> <p style="text-align: center;"> Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474</p>	<p>B. We concur with the need for standards for nonpotable water use, which would be addressed as water features were rehabilitated or redesigned. Standards for nonpotable water use for the Lincoln Reflecting Pool are District of Columbia Water Quality Standards, Class B -- Secondary Contact Recreation and Aesthetic Enjoyment.</p> <p>C. Moving the Tidal Basin walls is one possible method of widening the walkways. As the document states, there could be a short-term adverse impact from siltation during construction. Standard operating procedures for construction in a water body would be employed to keep this impact to a minimum.</p> <p>D. It is the policy of the National Park Service to consult with the U.S. Fish and Wildlife Service. This consultation would occur on a project-specific basis prior to construction.</p> <p>E. The National Park Service will consult with the U.S. Army Corps of Engineers as designs progress.</p> <p>F. The Lincoln Reflecting Pool and the Thomas Jefferson Memorial plaza seawall projects were in early stages when the <i>Draft Environmental Impact Statement</i> was issued. They were shown as cumulative projects on page 359 and described on pages 361 and 362. Project updates have been included in the final document.</p>

Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
G	<p><u><i>Fish and Wildlife</i></u></p> <p>Page 301 states that recreational fishing is allowed in the Tidal Basin. "However, urban pollution has adversely affected regional fish diversity and population numbers. PCBs and other chemical contaminants continue to be found in some fish caught in the Potomac and Anacostia rivers and their tributaries, including Rock Creek." With the proposal to move the Tidal Basin walls into the Basin, the FEIS should specify the habitat that would be affected by this disturbance and how the work can impact the habitat in the basin? In addition, since fish may already be compromised by contaminants, what measures will the NPS incorporate to protect habitat during construction?</p>	<p>G. The Tidal Basin is relatively shallow and sluggish, so its water tends to get warm in the summer, creating reduced quality aquatic habitat (reduced oxygen, increased algal growth, etc.). Nothing in the preferred alternative would increase the amount of other contaminants in the Tidal Basin or surrounding waterways.</p>
H	<p>The Fish and Wildlife Coordination Act provides that whenever the waters or channel of a body of water are modified by a department or agency of the U.S., the department or agency first shall consult with the U.S. Fish and Wildlife Service and with the head of the agency exercising administration over the wildlife resources of the state where construction will occur, with a view to the conservation of wildlife resources. Thus, it is imperative that the U.S. Fish and Wildlife Service be consulted when necessary.</p>	<p>H. During preparation of the <i>Draft Environmental Impact Statement</i>, NPS staff informed the U.S. Fish and Wildlife Service Field Office for the District of Columbia area of the planning effort and requested a list of endangered or threatened species that might be in the area. A response was received in September 2007 that stated no federally listed endangered or threatened species are known to exist in the planning area.</p> <p>In accordance with section 7 of the Endangered Species Act and relevant regulations at 50 CFR Part 402, the National Park Service determined that implementing the preferred alternative in this plan would have no effect on listed species, so formal consultation is not required.</p>
I	<p><u><i>Soils/Vegetation</i></u></p> <p>The NPS is proposing to improve soil conditions in heavily used areas in the center of the Mall by replacing or augmenting soils or implementing other sustainable technologies. In doing so, the hope would be to decrease soil compaction, increase soil quality and productivity by increasing the soils capacity to hold water and air. There is no mention of the kinds of sustainable technologies that may be used to improve soils. However, the NPS is planning to prepare an EA to address the alternatives for improving the growing conditions for turf and trees and an evaluation of options will be addressed. EPA is interested in receiving the proposed EA to assess the NPS alternatives. In the meantime, EPA poses the following questions:</p> <p>With replacing or augmenting soils or implementing sustainable technologies, can it be projected how long the improved soil conditions are expected to last and a plan developed to incorporate a timetable for scheduled monitoring or maintenance? Has the NPS considered implementing soil stabilization (seeding or covering areas that have been disturbed, tilled, etc) during construction? It is suggested that the NPS consider infiltration trenching (adding a sub-layer of permeable material such as gravel, to increase infiltration) as well as consider directing run off from paved areas to the permeable ones.</p>	<p>I. The Mall soil and turf study is ongoing, and an environmental assessment is being prepared. A consultant design team with expertise in sports field development is starting designs to restore the central turf panels. The approach will remove soil to a certain depth and replace it with a compaction-resistant but drainable soil system. Turf panels would be crowned for good drainage, as they were in the 1930s in accordance with designs by Frederick Law Olmsted Jr. The project includes the development of a durable irrigation system that would reuse captured rainwater stored in underground cisterns for irrigation. The system would also seek to use groundwater currently being removed from tunnels under the National Mall. This sustainable approach would help meet the requirements of Executive Order 13514 ("Federal Leadership in Environmental, Energy, and Economic Performance") to reduce the use of potable water by 26% by 2020. This is an important goal because the National Mall is the highest user of potable water within the national park system. Upon completion of the sidewalk plan, water collection and reuse of rainwater would be maximized.</p>
J	<p>In an effort to protect the hundreds of American elm trees and many acres of turf affecting the historic tapis verte (grass panels) which is the essential feature of the 1930 version of McMillan Plan, it would seem prudent to implement a monitoring plan to ensure permeability of soils and overall health of turf and trees. EPA commends the NPS for its discussion and commitment (page 66, Monitoring and Adaptive Management) to propose undertaking implementation plans to lay out how to achieve desired resource conditions as well as monitor progress. EPA suggests that an in depth discussion of the monitoring plans for the proposed alternatives to improve soils, turf and trees be outlined and compared in the proposed EA.</p> <p> Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474</p>	<p>J. Two studies that were not included in the <i>Draft Environmental Impact Statement</i> have been added to the bibliography and referenced in the final document. The 2009 "Elms of the Monumental Core: History and Management Plan" (NPS 2009f) and <i>Management Program for the Perpetuation of the American Elm Tree in the National Capital</i> (Save-The-Elms Task Force 2007). Monitoring programs being conducted by the National Mall and Memorial Parks are based on work with the Center for Urban Ecology. Current turf studies propose quick couplers to allow for consistent watering and will rely primarily on rainwater reuse. In addition, visual as well as physical conditions (such as soil compaction) will be monitored before, during, and after events.</p>

Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
K	<p><u>Pollution Prevention</u></p> <p>Page 453, discusses the need for a comfortable, walkable environment utilizing a coordinated hierarchy of paving materials to unify the National Mall. Although the paving materials would be commensurate with the importance of the National Mall and include surfaces appropriate for runners and joggers, EPA suggests looking into the possibility of using eco-friendly materials made of recycled materials.</p>	K. We believe these ideas are captured within recommendations of the Sustainable Sites Initiative™.
L	<p>To prevent runoff from newly developed areas from eroding steep areas, good environmental design should be employed to minimize and control runoff. Detention basins or paving with permeable asphalt or crushed stone may be appropriate where applicable.</p>	L. Please see response 8D to the U.S. Commission of Fine Arts regarding crushed stone and permeable pathway surfaces and the discussion of gravel walkways under “Summary of Comments and Responses,” beginning on page 12.
M	<p>Since new restrooms are planned, it is suggested to conserve water consumption by installing low-flow toilets. To ensure adequate supply and quality of water, monitoring of the water table and chemical testing of the water should be conducted.</p>	M. We agree that low-flow toilets are appropriate and are consistent with sustainable practices.
N	<p><u>Energy Efficiency</u></p> <p>This project does present an excellent opportunity to implement the President’s Executive Order 13423, Strengthening Federal Environmental Energy and Transportation Management by incorporating energy efficiency into the planning efforts. Enclosed with this letter is information that we recommend the NPS to consider when planning the various phases of the project.</p>	N. Executive Order 13423 is discussed on page 39 of the <i>Draft Environmental Impact Statement</i> , and energy efficiency has been incorporated into NPS management directives. Executive Order 13514 (“Federal Leadership in Environmental, Energy, and Economic Performance”) has been added to “Environmental Consequences: Park Operations — Methodology for Impact Analysis,” as well as Executive Order 13423.
O	<p><u>Waste Management and Recycling</u></p> <p>While incineration or burning the waste to generate electricity is a higher use in EPA waste hierarchy than landfilling, see http://www.epa.gov/epawasate/nonhaz/municipal/index.htm, it is recommended that the NPS recycle as much of their solid waste as possible.</p>	O. The National Park Service is seeking ways to recycle as much as possible. Different approaches are proposed for visitors, staff, concessioners, and event sponsors.
P	<p>While it may not be practical or cost effective to place recycling containers near all of the Mall’s 650-700 trash receptacles, the NPS should try to have recycling containers placed next to as many waste receptacles as possible and post signage encouraging people how and where to recycle on the Mall.</p>	P. Park managers have been working with the city, the Smithsonian Institution, and others on recycling, including appropriate education and messaging.
Q	<p>On page 352, Waste Management and Recycling section, the text reads “A recycling program conducted by a corporate donor in the early 1900s....” The text should probably be corrected to read “1990s” instead of 1900s.</p>	Q. Thank you. The correction has been made.
R	<p>If the NPS has not already done so, EPA suggests that they discuss their recycling and composting program with the following contacts in the DC area. They are as follows:</p> <p>The Department of Public Works:</p> <p>William B. Easley, Jr. Recycling Program Officer Office of Recycling 3220 Pennsylvania Avenue, S.E.</p> <p> Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474</p>	R. Park staff have been working with some of the listed contacts and have attended numerous programs to coordinate recycling efforts.

Comment

Letter 9. U. S. Environmental Protection Agency, Region III (cont.)

Response

Washington, D.C. 200020
202-646-8513 (direct)
202-645-8245 (hotline)
Email: william.easley@dc.gov

Russell Klein, Environmental Education Program Coordinator
Office of Recycling
3220 Pennsylvania Avenue, S.E.
Washington, D.C. 20020
202-645-8245 (hotline)
202-645-7191 (main)
202-645-8518 (fax)
Email: Russell.klein@dc.gov

The Metropolitan Washington Council of Governments:


John M. Snarr, Principal Environmental Planner
Metropolitan Washington Council of Governments
Department of Environmental Programs
777 North Capitol Street, N.E., Suite 300
Washington, DC 20002
202-962-3359
202-962-3203 (fax)

Email: jsnarr@mwkog.org
<http://www.mwkog.org/environmental/recycling/>


Brenda Platt, Institute for Local Self-Reliance
927 15th Street, N.W., 4th floor
Washington, DC 20005
202-898-1610 ext. 230
Email: bplatt@ilsr.org
www.ilsr.org


The most important step in setting up a waste collection and recycling program is negotiating a good contract with the waste/recycling hauler. EPA has enclosed tips that are essential to negotiating a good contract with the hauler.

[EDITOR'S NOTE: This particular attachment has not been reprinted.]

 Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474

Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
	<p style="text-align: center;">Environmental Impact Statement (EIS) Rating System Criteria</p> <p style="text-align: center;">RATING THE ENVIRONMENTAL IMPACT OF THE ACTION</p> <p>LO (Lack of Objections) - The review has not identified any potential environmental impacts requiring substantive changes to the preferred alternative. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposed action.</p> <p>EC (Environmental Concerns) - The review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact.</p> <p>EO (Environmental Objections) - The review has identified significant environmental impacts that should be avoided in order to adequately protect the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). The basis for environmental Objections can include situations:</p> <ol style="list-style-type: none"> 1. Where an action might violate or be inconsistent with achievement or maintenance of a national environmental standard; 2. Where the Federal agency violates its own substantive environmental requirements that relate to EPA's areas of jurisdiction or expertise; 3. Where there is a violation of an EPA policy declaration; 4. Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or 5. Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts. <p>EU (Environmentally Unsatisfactory) - The review has identified adverse environmental impacts that are of sufficient magnitude that EPA believes the proposed action must not proceed as proposed. The basis for an environmentally unsatisfactory determination consists of identification of environmentally objectionable impacts as defined above and one or more of the following conditions:</p> <ol style="list-style-type: none"> 1. The potential violation of or inconsistency with a national environmental standard is substantive and/or will occur on a long-term basis; 2. There are no applicable standards but the severity, duration, or geographical scope of the impacts associated with the proposed action warrant special attention; or 3. The potential environmental impacts resulting from the proposed action are of national importance because of the threat to national environmental resources or to environmental policies. <p style="text-align: center;">RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)</p> <p>1 (Adequate) - The draft EIS adequately sets forth the environmental impacts(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.</p> <p>2 (Insufficient Information) - The draft EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the proposal. The identified additional information, data, analyses, or discussion should be included in the final EIS.</p> <p>3 (Inadequate) - The draft EIS does not adequately assess the potentially significant environmental impacts of the proposal, or the reviewer has identified new, reasonably available, alternatives, that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. The identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. This rating indicates EPA's belief that the draft EIS does not meet the purposes of NEPA and/or the Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS.</p>	

Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
	<p style="text-align: center;">ENERGY EFFICIENCY</p> <p>The Federal government has made significant progress in improving environmental and energy performance through a series of executive orders, Memoranda of Understanding, and other guidance. Executive Order (EO) 13423: Strengthening Federal Environmental, Energy, and Transportation Management, intends to build on that body of work and success by integrating and updating prior practices and requirements into a cohesive, strategic approach to further ensure enhanced performance and compliance with statutory and other legal requirements. Section 2 of the EO directs Federal agencies to implement sustainable practices for:</p> <ul style="list-style-type: none"> • Energy efficiency and reductions in greenhouse gas emissions. • Use of renewable energy. • Reduction in water consumption intensity. • Acquisition of green products and services. • Pollution prevention, including reduction or elimination of the use of toxic and hazardous chemicals and materials. • Cost-effective waste prevention and recycling programs. • Increased diversion of solid waste. • Sustainable design/high performance buildings. • Vehicle fleet management, including the use of alternative fuel vehicles and alternative fuels and the further reduction of petroleum consumption. • Electronics stewardship. <p>Each agency shall use a variety of energy and water management strategies and tools to meet the goals of EO 13423. These strategies and tools include, but are not limited to, the following:</p> <p><u>Distributed Generation</u></p> <p>Where life-cycle cost effective, each agency shall implement distributed generation systems in new construction or retrofit projects, including renewable systems such as solar electric, solar lighting, geo (or ground-coupled) thermal, small wind turbines, as well as other generation systems such as fuel cell, cogeneration, or highly efficient alternatives. In addition, agencies are encouraged to use distributed generation systems when a substantial contribution is made toward enhancing energy reliability or security.</p> <p><u>Metering</u></p> <p>To the maximum extent practicable, agencies should install metering devices that measure consumption of potable water, electricity, and thermal energy in Federal buildings and other facilities and grounds. Data collected shall be incorporated into Federal tracking systems and be made available to Federal facility managers. Agencies should consider inclusion of metering requirements in all Energy Savings Performance Contracts (ESPC) and Utility Energy Services Contracts (UESC), as appropriate.</p> <p style="text-align: center;"> <i>Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474</i></p>	

Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
	<p><u>Auditing</u></p> <p>Agencies should conduct energy and water audits of at least 10 percent of facility square footage annually and conduct new audits at least every 10 years, thereafter. This audit requirement can be met by audits done in conjunction with ESPC or UESC projects.</p> <p><u>Energy Star® Tools</u></p> <p>For applicable facilities, agencies should meet Energy Star® Building criteria, and score the energy performance of buildings using the Energy Star® Portfolio Manager rating tool as part of comprehensive facility audits. Agencies may use the Energy Star Portfolio Manager rating tool to track energy and water use in all facilities.</p> <p><u>Energy Purchasing</u></p> <p>Agencies should purchase electricity and thermal energy from sources that use high efficiency and low-carbon generating technologies in order to reduce greenhouse gas intensity to the extent possible.</p> <p><u>Water Efficient Products</u></p> <p>Where applicable, agencies should purchase WaterSense (SM) labeled products and choose irrigation contractors who are certified through a WaterSense labeled program. EPA's WaterSense program is a voluntary public-private partnership that identifies and promotes high performance products and programs that help preserve the nation's water supply.</p> <p><u>Procurement</u></p> <p>Each agency shall give preference in their procurement and acquisition programs to the purchase of:</p> <ul style="list-style-type: none"> • Recycled content products designated in EPA's Comprehensive Procurement Guidelines. • Energy Star® products identified by DOE and EPA, as well as Federal Energy Management Program (FEMP) designated energy-efficient products. • Water-efficient products, including those meeting EPA's WaterSense standards. • Energy from renewable sources. • Biobased products designated by the U.S. Department of Agriculture in the BioPreferred Program. • Environmentally preferable products and services, including Electronic Product Environmental Assessment Tool (EPEAT) registered electronic products. • Alternative fuel vehicles and alternative fuels required by Energy Policy Act (EPAAct). • Products with low or no toxic or hazardous constituents, consistent with Section 7(a) of the EO. • Non-ozone depleting substances, as identified in EPA's Significant New Alternatives Program. <p> <i>Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474</i></p>	

Energy Efficient Standby Power Devices

When purchasing commercially available, off-the-shelf energy-consuming products, agencies shall purchase products that use no more than one watt of standby power as defined and measured by International Electrotechnical Commission (IEC) code 62301, or otherwise meet FEMP specifications for low standby power consumption. If FEMP has not specified a standby power level for a product category, agencies shall purchase products with the lowest standby power consumption available. Agencies shall adhere to these requirements, when life-cycle cost effective and practicable, and where the relevant product's utility and performance are not compromised as a result.

Recycling Programs

Each agency shall maintain waste prevention and recycling programs in all of its facilities in the most cost-effective manner possible, and where appropriate, leased facilities and facilities managed by the General Services Administration (GSA). In GSA managed facilities, GSA shall manage the recycling program, but agencies shall work with GSA to ensure that there is a recycling program that meets the agencies' needs.


Sustainability


Building construction and operation have an enormous direct and indirect impact on the environment. Buildings not only use resources such as energy and raw materials, they also generate waste and potentially harmful atmospheric emissions. As economy and population continue to expand, designers and builders face a unique challenge to meet demands for new and renovated facilities that are accessible, secure, healthy, and productive while minimizing their impact on the environment.

The main objectives of sustainable design are to avoid resource depletion of energy, water, and raw materials; prevent environmental degradation caused by facilities and infrastructure throughout their life cycle; and create built environments that are livable, comfortable, safe, and productive.

While the definition of what constitutes sustainable *building* design is constantly changing, there are six fundamental principles generally agreed on.

- **Optimize Site Potential**
 Creating sustainable buildings starts with proper site selection, including consideration of the reuse or rehabilitation of existing buildings. The location, orientation, and landscaping of a building affect the local ecosystems, transportation methods, and energy use. Siting for physical security has become a critical issue in optimizing site design. The location of access roads, parking, vehicle barriers, and perimeter lighting must be integrated into the design along with sustainable site considerations. Site design for security cannot be an afterthought. Along with site design for sustainability, it must be addressed in the preliminary design phase to achieve a successful project. See WBDG Balancing Security/Safety and Sustainability Objectives.

 Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
 Customer Service Hotline: 1-800-438-2474

Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
	<ul style="list-style-type: none"> • <u>Optimize Energy Use</u> With America's supply of fossil fuel dwindling, concerns for energy security increasing, and the impact of greenhouse gases on world climate rising, it is essential to find ways to reduce load, increase efficiency, and utilize renewable energy resources in federal facilities. • <u>Protect and Conserve Water</u> In many parts of the country, fresh water is an increasingly scarce resource. A sustainable building should reduce, control, or treat site-runoff, use water efficiently, and reuse or recycle water for on-site use when feasible. • <u>Use Environmentally Preferable Products</u> A sustainable building should be constructed of materials that minimize life-cycle environmental impacts such as global warming, resource depletion, and human toxicity. These environmentally preferable materials are defined by Executive Order 13101 to be "products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose." As such, they contribute to improved worker safety and health, reduced liabilities, reduced disposal costs, and achievement of environmental goals. • <u>Enhance Indoor Environmental Quality (IEQ)</u> The indoor environmental quality (IEQ) of a building has a significant impact on occupant health, comfort, and productivity. Among other attributes, a sustainable building should maximize daylighting; have appropriate ventilation and moisture control; and avoid the use of materials with high-VOC emissions. Additional consideration must now be given to ventilation and filtration to mitigate chemical, biological, and radiological attack. • <u>Optimize Operational and Maintenance Practices</u> Incorporate operating and maintenance considerations into the design of a facility will greatly contribute to improved working environments, higher productivity, and reduced energy and resource costs. Designers are encouraged to specify materials and systems that simplify and reduce maintenance requirements; require less water, energy, and toxic chemicals and cleaners to maintain; and are cost-effective and reduce life-cycle costs. <p>We realize that all of the recommendations listed above may not be applicable to this specific project but please consider these issues as you proceed through project design</p> <p style="text-align: center;"> <i>Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free. Customer Service Hotline: 1-800-438-2474</i></p>	

Comment	Letter 10. U.S. General Services Administration	Response
	<p>Suzanne Hill (suzanne.hill@gsa.gov) U.S. General Services Administration</p> <p>The U.S. General Services Administration's (GSA) National Capital Region, is appreciative of the opportunity to participate in the planning process for the National Mall Plan and to provide comments regarding the Draft Environmental Impact Statement (EIS). Overall, GSA finds that any of the proposed alternatives for the National Mall Plan would not adversely affect GSA operations or facilities. GSA offers the following comments regarding the information contained within the Draft EIS.</p> <p>Floodplains and Stormwaters: GSA is pleased that the flood control solution for 17th Street, NW that is under development is acknowledged in the Draft EIS and would be implemented under all alternatives. GSA supports the development of a flood control solution at 17th Street, NW.</p> <p>A Please clarify if the reference to the Potomac Park Levee on p.523 is for the future flood control solution or for the existing structure. If the reference on p.523 is referring to the future flood control solution on 17th Street, NW, GSA concurs that the downtown area would be benefited by greater flood protection.</p> <p>B P.354, Jurisdictional Issues: GSA is aware of the need to coordinate improvements of the steamlines with the National Park Service (NPS) and will continue to coordinate any efforts regarding any activities related to the steamlines.</p> <p>C P.364, Other Reasonably Foreseeable Actions: GSA started and completed the section of steamline work under the Ellipse in 2008, please correct the text accordingly.</p> <p>D P.364, Please correct the text regarding the steamline work at the Washington Monument to be consistent with the letter dated February 25, 2010, that GSA sent to the NPS regarding the status of the steamline work around the Washington Monument.</p> <p>E P. 376, Reasonably Foreseeable Actions, last paragraph: Please acknowledge the steamline work around the Washington Monument. In addition, the steamline work at the Ellipse concluded in 2008 and the text should be updated accordingly.</p> <p>F Appendix E: The floodplain map shown in Figure SOF-1, p. 578 indicates 100-yr floodplains located northeast of 17th Street, NW, extending across the Federal Triangle. GSA understands this is still preliminary mapping and contingent upon actions related to future construction of a 17th Street, NW flood control solution. Please revise figure or text to more accurately reflect the current status of floodplain mapping in the District of Columbia.</p> <p>GSA looks forward to continued coordination with NPS during the planning process for the National Mall Plan. Should you have any questions regarding the comments provided, please contact Ms. Suzanne Hill, National Environmental Policy Act Lead, at (202) 205-5821.</p>	<p>[EDITOR'S NOTE: The U.S. General Services Administration commented online and provided the following in response to question 6 ("Is there anything else you think NPS needs to consider with respect to the <i>Draft National Mall Plan</i>?").]</p> <p>A. The text refers to the future flood control solution. The text has been clarified.</p> <p>B. We appreciate your cooperation.</p> <p>C. The text on page 364 of the <i>Draft Environmental Impact Statement</i> referring to the Ellipse steamline has been deleted since this project has been completed..</p> <p>D. The text on page 364 in the <i>Draft Environmental Impact Statement</i> has been corrected based on your comments and the letter from your agency dated February 25, 2010.</p> <p>E. The text has been updated as you suggest.</p> <p>F. The map has been updated.</p>

Comment	Letter 11. Washington Metropolitan Area Transit Authority	Response
	<p>Ms. Susan Spain Project Executive National Park Service National Mall and Memorial Parks 900 Ohio Drive, SW Washington, DC 20024</p> <p>Dear Ms. Spain:</p> <p>The Washington Metropolitan Area Transit Authority (Metro) would like to congratulate the National Park Service (NPS) on the completion of the DRAFT National Mall Plan/Environmental Impact Statement (DEIS). The NPS goal of making the park areas and the National Mall more accessible is a laudable goal for access, regionally and nationally. Metro's ability to serve the National Mall for future First Amendment demonstrations and national celebrations is going to decrease over time as capacity on our system becomes more constrained. A key element to enhancing National Mall access is having a multi-modal, regional transit network that reliably moves people in and around the Mall. We invite NPS to participate in the current Metro studies underway, which include analysis of premium and express bus, light rail systems and regional streetcar services designed to meet the needs of the traveling public. As we evaluate these alternative modes, we are particularly interested in addressing access to activity centers — such as the National Mall — from a systems perspective.</p> <p>In response to the DRAFT National Mall Plan DEIS, below are our recommendations to support the access and circulation items identified in the National Mall Plan alternatives:</p> <p>District of Columbia Metrorail Station Name Change. The National Mall Plan recommends the name change of the Smithsonian Metrorail Station to include, "National Mall", so as to improve wayfinding and access for visitors to the National Mall. As per the Washington Metropolitan Area Transit Authority Board procedure adopted on September 30, 1987 and codified in section P/I 4.1/2 of Attachment B (enclosed), the NPS must submit to the District of Columbia a request for a Metrorail station name change, which will be reviewed as outlined also in Attachment B and forwarded for action/non-action to WMATA. Should the name change be approved, the NPS would be responsible for the significant costs associated with the name change on all system maps and pylons. To minimize costs, the NPS could coordinate the timing of this name change with the scheduled December 2013 opening of the initial segment of the Dulles Corridor Metrorail Project. Depending upon a visitor's particular location on the National Mall, several other Metrorail stations can be more convenient than the Smithsonian station. Metro recommends that wayfinding be employed so that visitors can be informed of the various access and circulation options provided by other Metrorail stations so that ridership can be more evenly distributed among several stations, particularly during major events.</p> <p>New Metrorail Station and/or New Metrorail Entrance. To provide increased access and capacity for future visitors to the National Mall, the National Capital Planning Commission's Legacy Plan recommends the construction of a new Metrorail Station at East Potomac Park and additional entrances be added to the Archives and Federal Triangle Metrorail Stations along the Blue and Orange Lines. Although the recommended plan does not include these proposals, they are discussed briefly in the DEIS. In accordance with Washington Metropolitan Area Transit Authority Board procedures, any new facilities outside of the Adopted Regional System (ARS) must be paid for by the entity requesting the improvement/enhancement. To initiate this process, the NPS would submit to the District of Columbia a request to perform: 1.) A feasibility study for the construction of a new Metrorail station at East Potomac Park; and 2.) Demand and capacity analysis to determine the need and associated costs for station access improvements, including a new entrance, at both Archives and Federal Triangle Metrorail Stations.</p>	<p>[EDITOR'S NOTE: The Washington Metropolitan Area Transit Authority commented online and provided identical responses to question 2 ("Within each category, indicate the extent to which you agree with the specific elements of the Preferred Alternative vision to restore the National Mall?") and question 6 ("Is there anything else you think NPS needs to consider with respect to the <i>Draft National Mall Plan</i>?").]</p> <p>A. Text in the <i>Draft Environmental Impact Statement</i> on page 443 ("Environmental Consequences: Access and Circulation — Impacts Common to all Alternatives") has been updated to reflect your statement about Metro's ability to serve the National Mall in the long-term.</p> <p>B. Thank you for reiterating the process and recommending coordinated timing with a 2013 scheduled update for the initial segment of the Dulles Corridor Metrorail Project. The wayfinding program identifies multiple Metro stations.</p> <p>C. As stated in your comment, the National Capital Planning Commission has proposed these enhancements of the Metrorail system, which the National Park Service supports. Thank you for information about procedures for getting new facilities approved.</p>

Comment	Letter 11. Washington Metropolitan Area Transit Authority (cont.)	Response
	<p>Bus Circulation Access for Visitors. The National Mall Plan DEIS presents several opportunities to enhance access to the great number of memorials and parks on the National Mall. Several Metro staff members were active participants in the development of the National Park Service 2006 <i>Environmental Assessment and Visitor Transportation Study</i> and its recommendations for enhanced transportation circulation on the National Mall. We are pleased to see that the National Mall Plan DEIS also includes the <i>Visitor Transportation Study</i> recommendations in its access and circulation alternatives. Metro will continue to support the NPS and the District of Columbia to ensure that the Metrobus and Metrorail services complement the existing DC Circulator bus service and the two planned <i>Visitor Transportation Study</i> routes: the Memorials Visitor and the Memorials/Downtown Transportation Routes, which will serve the National Mall area in the near future.</p> <p>Metro appreciates the opportunity to have participated in this effort as a cooperating agency, and looks forward to working with the NPS and District of Columbia on improvements to the National Mall.</p> <p>Sincerely,</p> <p>Tom Harrington Director, Office of Long Range Planning Department of Planning and Joint Development</p> <p>Attachment</p> <p>cc: Jim Hamre, WMATA, BPLN Alexa Viets, National Park Service Aaron Overman, DDOT, Mass Transit Administration</p>	