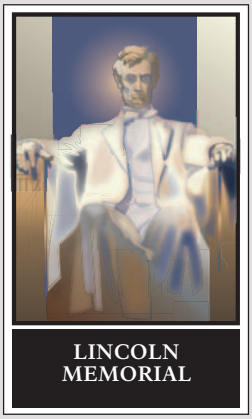
National Park Service
U.S. Department of the Interior

National Mall and Memorial Parks • Washington, D.C.

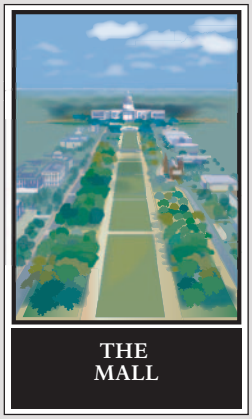

WASHINGTON MONUMENT

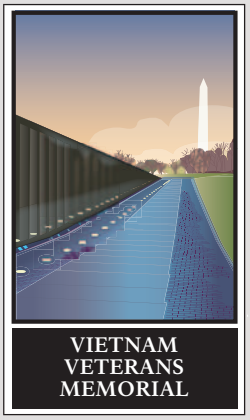

LINCOLN MEMORIAL


THOMAS JEFFERSON MEMORIAL


WORLD WAR II MEMORIAL


KOREAN WAR VETERANS MEMORIAL


THE MALL

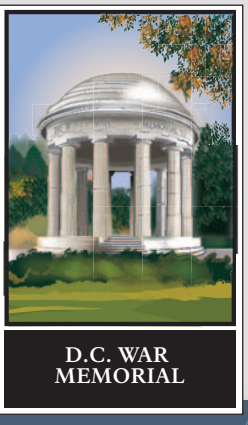

VIETNAM VETERANS MEMORIAL


ULYSSES S. GRANT MEMORIAL


CONSTITUTION GARDENS


FRANKLIN DELANO ROOSEVELT MEMORIAL


GEORGE MASON MEMORIAL


D.C. WAR MEMORIAL

©SM

FINAL
NATIONAL MALL PLAN / ENVIRONMENTAL IMPACT STATEMENT
VOLUME 2

THE NATIONAL MALL
Washington, D.C.

CONTENTS: FINAL NATIONAL MALL PLAN / ENVIRONMENTAL IMPACT STATEMENT

Volume 2

This version of the *Final National Mall Plan / Environmental Impact Statement* is the same as the printed copy. It has been broken into files for easier browsing. Each part name below is hyperlinked to that part of the main document. Each part is fully bookmarked and is also linked back to this contents page and to the next part.

Summary of Comments and Responses

Cooperating Agencies

Consulting Parties

Regional Governments and Organizations

Individuals

ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
ADAAG	Americans with Disabilities Act Accessibility Guidelines
AIA	American Institute of Architects
AOC	Architect of the Capitol
ASLA	American Society of Landscape Architects
CEQ	Council on Environmental Quality
CFA	U.S. Commission of Fine Arts
CUE	Center for Urban Ecology (NPS)
CFR	Code of Federal Regulations
DBID	Downtown Business Improvement District
DDOT	D.C. Department of Transportation
FHWA	Federal Highway Administration
GAO	Governmental Accounting Office
GSA	General Services Administration
LCS	List of Classified Structures
LEED	Leadership in Energy and Environmental Design
MWCOG	Metropolitan Washington Council of Governments
NAMA	National Mall and Memorial Parks
NCPC	National Capital Planning Commission
NCR	National Capital Region (NPS)
NHPA	National Historic Preservation Act
NEPA	National Environmental Policy Act
NPS	National Park Service
PMIS	project management information system (NPS)
SCS	Soil Conservation Service
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDI	U.S. Department of the Interior
US EPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USGS	U.S. Geological Survey
USPP	United States Park Police
WABA	Washington Area Bicyclist Association
WMATA	Washington Metropolitan Area Transit Authority
WMATC	Washington Metropolitan Area Transit Commission

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Final
National Mall Plan / Environmental Impact Statement
Volume 2

The National Mall • Washington, D.C.

Comments and Responses for the Draft National Mall Plan / Environmental Impact Statement

Volume 2 of the *Final Management Plan / Environmental Impact Statement* for the National Mall in Washington, D.C., includes all of the comments received on the *Draft Environmental Impact Statement,* along with responses to substantive comments.

The *Draft Management Plan / Environmental Impact Statement* was on review from December 18, 2009, to March 18, 2010. A total of 401 separate comments from 11 cooperating agencies, 12 consulting parties, 3 regional governments, 9 organizations, and 47 individuals, plus 41 individuals who wished to remain anonymous, were received.

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

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ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
AOC	Architect of the Capitol
ASLA	American Society of Landscape Architects
ARRA	American Recovery and Reinvestment Act
ASTM	American Society for Testing and Materials
CEQ	Council on Environmental Quality
CFA	U.S. Commission of Fine Arts
CFR	*Code of Federal Regulations*
DBID	Downtown Business Improvement District
DDOT	D.C. Department of Transportation
DEIS	*Draft Environmental Impact Statement*
FHWA	Federal Highway Administration
FR	*Federal Register*
GSA	General Services Administration
LEED	Leadership in Energy and Environmental Design
NAMA	National Mall and Memorial Parks
NCPC	National Capital Planning Commission
NGA	National Gallery of Art
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
NRHP	National Register of Historic Places
USBG	U.S. Botanic Garden
USC	*United States Code*
US EPA	U.S. Environmental Protection Agency
USPP	United States Park Police
WMATA	Washington Metropolitan Area Transit Authority

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COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

This volume summarizes the comments received on the *Draft National Mall Plan / Environmental Impact Statement* (DEIS), which was released to the public on December 18, 2009. All comments were considered during the preparation of the *Final Environment Impact Statement*, in accordance with the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (40 CFR 1503). The comments allowed the study team, NPS decision-makers, and other interested parties to review and assess the views of other agencies, organizations, and individuals related to the preferred alternative, the other alternatives, and potential impacts. It is important to note that the selection of the alternative that will be implemented as the plan is not based on how many people supported a particular alternative.

Substantive comments have been summarized and responses provided; where appropriate, changes to the final document have been made. Comments from all cooperating agencies, consulting parties, regional governments, organizations, and individuals are reprinted in this volume. Comments simply expressing a preference for an alternative or action within an alternative were not responded to, nor were questions and comments that did not directly address issues relevant to the plan.

The Council on Environmental Quality's regulations for implementing the National Environmental Policy Act require that the National Park Service respond to substantive comments, which are defined in *Director's Order #12: Handbook for Environmental Impact Analysis* (NPS 2001b) as those that do one or more of the following:

(a) question, with reasonable basis, the accuracy of information in the environmental impact statement

(b) question, with reasonable basis, the adequacy of environmental analysis

(c) present reasonable alternatives other than those presented in the environmental impact statement

(d) cause changes or revisions in the proposal

In other words, they raise, debate, or question a point of fact or policy.

The notice of availability of the *Draft Environmental Impact Statement* was printed in the *Federal Register* on December 18, 2009 (74 FR 67206) and a press release was also issued. The public comment period lasted until March 18, 2010. A total of 175 printed copies of the *Draft Environmental Impact Statement* were sent out. In addition, nearly 13,000 e-mails were sent to people announcing the availability of the document on the park website; 2,580 people (23%) opened the e-mail, and 6% of these clicked on the link to the plan website; about 1,500 (11%) e-mails bounced. About 6,850 CDs of the document were mailed, of which 1,275 (18.6%) were returned as undeliverable. Tweets were sent out to announce the availability of the draft document on December 21, 2009, and to remind people to comment on December 30, 2009, and on January 27 and March 15, 2010.

A media release and an e-mail alert announced a public meeting on February 18, 2010, in Washington, D. C. The meeting provided an overview of the agency preferred alternative, answered questions from the public, provided information on what constituted substantive comments, and encouraged attendees to submit comments.

RANGE OF COMMENTS

The National Park Service received written comments on the *Draft Environmental Impact Statement* from 11 cooperating agencies, 12 consulting parties, 3 regional governments, 9 organizations, and 47 individuals (see Table 4). In addition, 41 individuals who wished to remain anonymous submitted comments online.

A total of 401 distinct comments were coded within the comment letters. Comments were coded based on the four categories above (accuracy of information, adequacy of the environmental analysis, other reasonable alternatives,

and comments that prompted revisions or changes to the preferred alternative), plus general comments. To avoid overcounting, comments repeated multiple times in a single letter were only counted once. This allowed the frequencies and percentages to accurately indicate the number/percentage of different letters that reflected similar ideas. Table 1 summarizes comments by category, theme, and subtheme.

Comments that called into question the accuracy of the information presented in the *Draft National Mall Plan / Environmental Impact Statement* comprised 14.2% of the total. Remarks that queried the adequacy of the analysis made up 8.7% of the comments. Observations that suggested other potential alternatives were made in 5.5% of the comments. Comments that prompted revisions to the preferred alternative comprised 17.0% of the total. The final category — general comments — encompassed 54.6% of the remarks. These comments stated issues and concerns that had already been addressed in the *Draft Environmental Impact Statement*.

TABLE 1: COMMENT CATEGORIES, THEMES AND SUBTHEMES, FREQUENCIES AND PERCENTAGES

Category / Theme and Subtheme	Frequency	Percent
Accuracy of Information		
Agency Cooperation	20	
Balancing Use and Preservation	6	
Civic Space	5	
Facilities (information)	7	
Gravel Walkways	8	
Planning Area	7	
Temporary vs. Permanent Structures	4	
Subtotal	**57**	**14.2**
Adequacy of Environmental Analysis		
Accessibility	4	
Climate Change	1	
Elm Trees	1	
Events	1	
Future Changes (level/amount)	3	
Level of Detail	4	
Restrooms	7	
Transportation	9	
Visitation	5	
Subtotal	**35**	**8.7**
Other Reasonable Alternatives		
Access and Circulation	4	
Artificial Turf	1	
ATMs	1	
D.C. War Memorial	1	
Education	2	
Public Restroom Standards	6	
Recreation	3	
Statues / Additional Commemoration	3	
U.S. Park Police Stables	1	
Subtotal	**22**	**5.5**
Revisions / Changes to the Preferred Alternative		
Access and Circulation		
•Potomac River Bridges	1	
•Metro Access	2	
Cultural Resource Effects and Ongoing Consultations	4	
•National Register of Historic Places (NRHP) Nomination	4	
Map Corrections/Updates	3	
Paving	4	
Principles and Standards Needed	8	
Priorities for Implementation and Development Guide Map	6	
Recreation (revisions)	2	
Recycling and Sustainability	14	
Safety and Security	3	
Status of Ongoing NPS Projects	2	
•Wayfinding signs	2	
•Soil and turf study (ongoing)	1	
•*Visitor Transportation Study* FONSI	3	
•Martin Luther King, Jr. Memorial	2	
Update Request — ARRA projects	2	
•D.C. War Memorial	1	
•Lincoln Memorial Reflecting Pool area	1	
•Thomas Jefferson Memorial plaza seawalls	1	
Washington Monument (revisions)	1	
Water Taxis	1	
Subtotal	**68**	**17.0**
General Comments		
Access and Circulation	18	
Civic Stage (First Amendment)	22	
Cultural Resources and Consultations	8	
Health and Safety	6	
National Mall Purpose and Concepts	13	
Natural Resources	10	
•Landscape	17	
•Water quality	6	
Park Operations	1	
•Infrastructure	1	
•Maintenance (NPS)	5	
•Volunteers	2	
Visitor Facilities and Amenities	22	
Visitor Information, Education, Enjoyment	12	
•Bicycling	3	
Specific Park Areas	5	
•Union Square	15	
•Mall (between 3rd and 14th streets)	6	
•Washington Monument and Grounds (plan comment topics)	3	
•Constitution Gardens	5	
•Lincoln Memorial and Grounds	3	
•Other West Potomac Park — north of Independence Avenue	1	
•Tidal Basin	3	
•Other Areas	3	
Other Comments	15	
•Costs and Funding	14	
Subtotal	**219**	**54.6**
TOTAL	**401**	**100**

Frequently mentioned issues or concerns are addressed generally in the "Summary of Comments and Responses." All specific comments are responded to starting on page 30.

Comments were received from 31 states, the District of Columbia, and Guam (see Table 2). Comments came from every region of the 48 contiguous states, as well as Alaska and Hawaii. The vast majority of the online comments came from residents of Virginia and the District of Columbia.

Comments from cooperating agencies, consulting parties, regional governments, and organizations originated almost exclusively from offices in the District of Columbia (see Table 3).

TABLE 2: GEOGRAPHIC DISTRIBUTION OF COMMENTS

Location	Frequency	Location	Frequency
AL	2	MO	1
AK	1	NC	3
AR	1	NE	1
AZ	1	NH	1
CA	7	NJ	1
CO	1	NV	1
CT	3	NY	3
DC	18	OH	1
FL	2	OK	1
GA	1	OR	1
GU	1	PA	5
HI	1	TN	1
IL	1	TX	1
KY	1	UT	1
LA	1	VA	20
MD	5	VT	1
MI	2	WV	1

TABLE 3: GEOGRAPHIC DISTRIBUTION OF STAKEHOLDER COMMENTS

Location	Frequency
CO	1
DC	27
MD	3
MI	1
OR	2
VA	3

COMMENTERS AND TOPICS

Cooperating agencies, consulting parties, regional governments, organizations, and individuals who provided comments are listed in Table 4. Copies of their comments are included in "Specific Comments and Supplemental Responses," beginning on page 30. Identifying information is not shown for individuals who requested that their information be kept private.

TABLE 4: COMMENTS RECEIVED ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Letter No.	Name	Comment Topics
Cooperating Agencies		
1.	Advisory Council on Historic Preservation	Agency cooperation; NRHP nomination; implementation priorities and development guide map; principles and standards; other comments
2.1.	Architect of the Capitol (comments to NCPC, 2/23/2010)	Agency cooperation
2.2.	Architect of the Capitol (comments to NPS, 3/18/2010)	Agency cooperation; Union Square
3.	D.C. Office of Planning	Map corrections/updates; recreation (revisions)
4.	D.C. State Historic Preservation Office	Effects and ongoing consultations; NRHP nomination; implementation priorities and development guide map; principles and standards; Union Square
5.1.	Federal Reserve Board	No comments
5.2.	Federal Reserve Board	No comments
6.1.	National Capital Planning Commission (staff recommendation, 2/25/2010)	Transportation; map corrections/updates; implementation priorities and development guide map; recycling and sustainability; soil and turf study (ongoing); Washington Monument (revisions)
6.2.	National Capital Planning Commission (comments to NPS, 3/18/2010)	Map corrections/updates; NRHP nomination; other comments (website)
7.	Smithsonian Institution	Balancing use and preservation; implementation priorities and development guide map; update request (ongoing NPS projects)
8.	U.S. Commission of Fine Arts	Balancing use and preservation; gravel walkways; D.C. War Memorial; recycling and sustainability; other comments (overall support)
9.	U.S. Environmental Protection Agency	Agency cooperation; recycling and sustainability; Thomas Jefferson Memorial plaza seawalls; landscape; water quality; other comments (aquatic habitat)
10.	U.S. General Services Administration	Agency cooperation; other comments (flood control)

Letter No.	Name	Comment Topics
11.	Washington Metropolitan Area Transit Authority	Agency cooperation; transportation; *Visitor Transportation Study* FONSI; Metro
Consulting Parties		
12.	American Society of Landscape Architects (comments to NCPC, 3/4/2010)	Agency cooperation; facilities (information); gravel walkways; elm trees; recycling and sustainability; wayfinding signs; other comments (soil and design competition support); costs and funding
13.	The Committee of 100 on the Federal City	Agency cooperation; balancing use and preservation; civic space; facilities (information); planning areas; accessibility; transportation; climate change; restrooms; visitation; D.C. War Memorial; recycling and sustainability; update request (ongoing NPS projects, Martin Luther King, Jr. Memorial, ARRA projects); D.C. War Memorial; safety and security; cultural resources and consultations; natural resources; civic stage (First Amendment); Union Square; Mall (between 3rd and 14th streets); Washington Monument and grounds (plan comment topics); Lincoln Memorial and grounds; West Potomac Park – north of Independence; Tidal Basin; other areas; other comments (define National Mall)
14.1.	D.C. Preservation League (comments to NCPC, 3/4/2010)	Agency cooperation; Lincoln Memorial Reflecting Pool area; Union Square; Mall (between 3rd and 14th streets); Washington Monument and grounds (plan comment topics); Constitution Gardens; other areas
14.2.	D.C. Preservation League (comments to NPS, 3/18/2010)	Agency cooperation; balancing use and preservation; planning area; temporary vs. permanent structures; transportation; level/amount of change; events; restrooms; visitation; statues and additional commemoration; principles and standards needed; safety and security; civic stage; Union Square; Constitution Gardens
15.	Downtown DC Business Improvement District (comments to NCPC, 3/4/2010)	Balancing use and preservation; transportation; restrooms; access and circulation (roads); public restroom standards; National Mall purpose and concepts; visitor facilities and amenities; maintenance (NPS); costs and funding
16.	Eisenhower Memorial Commission (comments to NCPC, 3/4/2010)	Statues and additional commemoration; effects and ongoing consultations; National Mall purpose and concepts
17.	Guest Services, Inc.	No comments
18.	Guild of Professional Tour Guides	Other areas (Lockkeeper's House)
19.1.	National Coalition to Save Our Mall (comments to NCPC, 3/4/2010)	Agency cooperation; facilities (information); gravel or stone dust paving; planning area; level of detail; paving; implementation priorities and development guide map; principles and standards needed; National Mall purpose and concepts
19.2	National Coalition to Save Our Mall (comments to NPS, 3/18/2010)	Agency cooperation; civic space; facilities (information); gravel or stone dust paving; planning area; restrooms; public restroom standards; effects and ongoing consultations; NRHP nomination; paving; principles and standards needed; Metro; National Mall purpose and concepts; Union Square; Mall (between 3rd and 14th streets); Washington Monument and grounds
20.	National Parks Conservation Association	Agency cooperation; civic space; gravel walkways; planning area; temporary vs. permanent structures; accessibility; level/amount of change; level of detail; restrooms; public restroom standards; principles and standards needed; cultural resources and consultations; civic stage (First Amendment); visitor facilities and amenities; Union Square; Constitution Gardens
21.	National Trust for Historic Preservation	Agency cooperation; facilities (information); planning area; temporary vs. permanent structures; level/amount of change; visitation; effects and ongoing consultations; priorities for implementation and development guide map; recycling and sustainability; National Mall purpose and concepts; civic stage (First Amendment); Union Square
22.	Society of Architectural Historians, Latrobe Society	Civic space; facilities (information); gravel or stone dust paving; visitation; paving; principles and standards needed; safety and security; cultural resources and consultations; landscape; Union Square; Constitution Gardens; Tidal Basin
23.	Trust for the National Mall	Civic space; accessibility; visitation; Union Square
Regional Governments		
24.	City of Alexandria, Virginia	Accessibility; transportation; Potomac River bridges; water taxis; wayfinding signs; bicycling
25.	Loudoun County, Virginia	No comments given
26.	Maryland Department of Transportation	No comments given
Organizations		
27.	American Institute of Architects, Washington, DC, Chapter	Transportation; education; principles and standards needed; recycling and sustainability
28.	American Restroom Association	Restrooms; Mall (between 3rd and 14th streets)
29.	The Association of the Oldest Inhabitants of The District of Columbia	Agency cooperation; facilities (information); gravel walkways; temporary vs. permanent structures; transportation; recreation (alternatives); paving; recreation (revisions); recycling and sustainability; *Visitor Transportation Study*

Letter No.	Name	Comment Topics
		FONSI; National Mall purpose and concepts; landscape; visitor information, education, enjoyment; visitor facilities and amenities; health and safety; Mall (between 3rd and 14th streets)
30.	Detroit Model Yacht Club (DMYC)	Visitor information, education, enjoyment; Constitution Gardens
31.	Gold Star Mothers National Monument Foundation, Inc.	Statues and additional commemoration
32.	National Turfgrass Association	Agency cooperation; balancing use and preservation; landscape; civic stage; costs and funding
33.1	Public Hygiene Lets Us Stay Human — online comment	Restrooms (analysis); public restroom standards; visitor facilities and amenities
33.2	Public Hygiene Lets Us Stay Human — letter	Agency cooperation; public restroom standards
34.	Stars Unlimited	Agency cooperation; planning area; education; recycling and sustainability; natural resources; visitor information, education, enjoyment; health and safety
35.	University of Colorado	Agency cooperation; recycling and sustainability; landscape; visitor facilities and amenities; other comments (commercialization)
Individuals		
36.	Anonymous comments online — Question 1 (40 individual comments)	Artificial turf / remove turf; recreation (alternatives); recycling and sustainability; cultural resources and consultations; natural resources; landscape; water quality; civic stage; access and circulation; visitor information, education, enjoyment; bicycling; visitor facilities and amenities; park operations; maintenance; specific park areas; Union Square; Lincoln Memorial and grounds; other comments (commercialization); costs and funding
37.	Anonymous comments online — Question 2 (13 individual comments)	Cultural resources and consultations; civic stage; access and circulation; visitor facilities and amenities; costs and funding
38.	Anonymous comments online — Question 3 (9 individual comments)	Level of detail; National Mall purpose; natural resources; landscape; civic stage; access and circulation; visitor facilities and amenities; costs and funding
39.	Anonymous comments online — Question 4 (7 individual comments)	Civic stage; visitor information, education, enjoyment; visitor facilities and amenities; costs and funding
40.	Anonymous comments online — Question 5 (11 individual comments)	National Mall purpose; landscape; civic stage; access and circulation; costs and funding
41.	Anonymous comments online — Question 6 (28 individual comments)	ATMs; access and circulation (roads); update request (ARRA projects); National Mall purpose; cultural resources and consultation; landscape; civic stage; access and circulation; visitor information, education, enjoyment; bicycling; visitor facilities and amenities; health and safety; Union Square; Mall (between 3rd and 14th streets); other comments (timing); costs and funding
42.	Kathryn Anthony	Public restroom standards
43.	Adam Bliss	Landscape; water quality
44.	Maurice Brown	Recycling and sustainability; natural resources; landscape; visitor facilities and amenities
45.	Eleanor Budic	Cultural resources and consultations; natural resources
46.	Jon Bussard	Access and circulation; visitor facilities and amenities; Union Square
47.	Susan Campbell	Water quality; access and circulation; visitor facilities and amenities
48.	Regina Carelli	Access and circulation
49.	Mary Champion	Access and circulation; Tidal Basin
50.	John Cloud	Infrastructure
51.	Ann Coffey	Costs and funding
52.	John Coghlan	Recycling and sustainability; civic stage
53.	Brian Daniel	Civic stage
54.	Martha DeVault	Landscape; visitor facilities and amenities
55.	Sherrill Futrell	Civic stage
56.	Dan Gamber	Access and circulation; specific park areas
57.	Frederick Graefe	Health and safety; specific park areas
58.	Carl Hames	Civic stage
59.	John Hance	Landscape; other comments
60.	William Haskett	National Mall purpose and concepts
61.	Chuck Hookstra	Costs and funding
62.	Michele Hopkins	Landscape; water quality; access and circulation; visitor facilities and amenities; Union Square; other comments
63.	Tom Howlett	Natural resources; visitor facilities and amenities; other comments; costs and funding
64.	Sydney Jacobs	Recycling and sustainability; National Mall purpose and concepts; access and circulation
65.	Lynn Jone	Martin Luther King, Jr. Memorial
66.	Andrew Kalukin	Civic stage

Letter No.	Name	Comment Topics
67.	Lisa Landis	Civic stage
68.	Randy Leader	Natural resources; water quality; civic stage; access and circulation; visitor facilities and amenities
69.	Iain Lowrie	Recreation; visitor information, education, enjoyment; visitor facilities and amenities
70.	John Mariani	Gravel walkways; access and circulation
71.	Peter McCann	Cultural resources and consultations; landscape; visitor information, education, enjoyment; health and safety
72.	Jo Mozingo	National Mall purpose and concepts; visitor information, education, enjoyment; visitor facilities and amenities
73.	Timothy Price	Access and circulation
74.	Larry Powers	Volunteers
75.	Jean Public	Landscape
76.	Tom Rampulla	Maintenance (NPS); volunteers
77.	Jerry and Peg Schubert	Costs and funding
78.	Sarah Simmons	Agency cooperation
79.	Brian Simpson	Civic stage
80.	Jon Spinac	Civic stage
81.	R. Steffens	Transportation; access and circulation (roads); visitor transportation plans; access and circulation; visitor information, education, enjoyment; visitor facilities and amenities; park operations; maintenance (NPS)
82.	Doug Stone	Landscape; maintenance (NPS); specific park areas
83.	Cornelia Strawser	Natural resources; visitor information, education, enjoyment; Union Square
84.	Gary Thompson	Other comments
85.	Carol Trainer	Access and circulation; visitor facilities and amenities; other comments; costs and funding
86.	John Truesdale	Civic stage
87.	Daniel Wemhoff	Level of detail; National Mall purpose and concepts; civic stage; visitor information, education, enjoyment; visitor facilities and amenities; specific park areas; Lincoln Memorial and grounds
88.	Lindsley Williams	Natural resources; access and circulation

ONLINE COMMENT FORM

The following form was posted online at www.nps.gov/nationalmallplan for people to comment specifically about the preferred alternative presented in the *Draft National Mall Plan / Environmental Impact Statement*. The form was available until March 18, 2010. Online comments included in the next chapter were made in response to the following questions. A quantitative analysis of responses is included in the appendix.

1. Indicate the extent to which you agree with the overall preferred alternative vision to restore the National Mall.
   - o No opinion
   - o Agree with the entire vision
   - o Agree with most elements of the vision
   - o Disagree with most elements of the vision
   - o Disagree with the entire vision

   Please tell us why. [Space for comments.]

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?

   a. Cultural Resources (memorials, preservation, Section 106 process, recommended future consultation)
      - o No opinion
      - o Agree with the entire vision
      - o Agree with most elements of the vision
      - o Disagree with most elements of the vision
      - o Disagree with the entire vision

   b. Natural Resources (water, flooding, soils, lawns/turf, trees, nuisance birds, health of the landscape, other)
      - o No opinion
      - o Agree with the entire vision

- Agree with most elements of the vision
- Disagree with most elements of the vision
- Disagree with the entire vision

c. The Civic Stage (demonstrations, national celebrations, special events, permits or processes, event records)
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision
   - Disagree with most elements of the vision
   - Disagree with the entire vision

d. Access and Circulation (roads, visitor parking, public transit, visitor transit, pedestrians, crosswalks, visitors with disabilities, bicycles)
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision
   - Disagree with most elements of the vision
   - Disagree with the entire vision

e. Visitor Experiences (information, education, enjoyment, recreation; amenities—facilities, pedestrian environment; commercial services)
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision
   - Disagree with most elements of the vision
   - Disagree with the entire vision

f. Health and Safety
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision
   - Disagree with most elements of the vision
   - Disagree with the entire vision

g. Park Operations (sustainability, reducing deferred maintenance, higher standards)
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision
   - Disagree with most elements of the vision
   - Disagree with the entire vision

h. Other Elements
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision
   - Disagree with most elements of the vision
   - Disagree with the entire vision

Please tell us why. [Space for comments.]

3. Indicate the extent to which you agree with the description of how the preferred alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals. (See Table 5 in the draft plan.)
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision
   - Disagree with most elements of the vision
   - Disagree with the entire vision

Please tell us why. [Space for comments.]

4. Indicate the extent to which you agree with the comparison of how the alternatives meet the plan objectives laid out in Table 6.
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision

- Disagree with most elements of the vision
- Disagree with the entire vision

Please tell us why. [Space for comments.]

5. Do you agree with the actions common to all alternatives?
   - No opinion
   - Agree with the entire vision
   - Agree with most elements of the vision
   - Disagree with most elements of the vision
   - Disagree with the entire vision

Please tell us why. [Space for comments.]

6. Is there anything else you think NPS needs to consider with respect to the *Draft National Mall Plan?*
   - No comments
   - Yes [Space for comments.]

SUMMARY OF COMMENTS AND RESPONSES

Comment topics identified during the public comment period on the *Draft Environmental Impact Statement* are summarized in this chapter, along with responses to those comments. These responses form the basis of the responses to specific comments in the next chapter. The National Park Service thanks everyone for their comments.

Topics are grouped according to what are considered substantive comments — accuracy of information, adequacy of the environmental analysis, other reasonable alternatives, and comments that resulted in changes or revisions to the preferred alternative (see page 1).

ACCURACY OF INFORMATION

Agency Cooperation

Comment: Coordination between the National Park Service and cooperating agencies is not clearly explained.

> ***Commenters:*** The Committee of 100 on the Federal City, National Coalition to Save Our Mall, National Parks Conservation Association, National Trust for Historic Preservation, Society of Architectural Historians — Latrobe Chapter

Response: As stated in the *Draft Environmental Impact Statement* on pages 544–46, cooperating agencies participated in several multiday workshops to help develop planning principles, preliminary alternatives, and the preferred alternative, in addition to providing extensive comments during internal reviews of the draft document before its publication.

While consulting parties may represent specific constituents, meetings with cooperating agencies and those with consulting parties for National Historic Preservation Act (NHPA) section 106 consultations were kept separate to avoid a perception that some groups might have more influence than general citizens. Most cooperating agencies chose not to participate in consulting party meetings under section 106.

Balancing Use and Preservation

Comments: Concerns were raised that the National Park Service is preservation oriented rather than supporting public use. Some individuals suggested removing all trees and lawns and paving everywhere, while other said that grass should only be used during very important events.

> ***Commenters:*** Smithsonian Institution, National Coalition to Save Our Mall, National Parks Conservation Association, National Trust for Historic Preservation, individuals

Response: The National Park Service seeks to balance preservation and use, as mandated by the NPS Organic Act.

The National Mall has a civic purpose that is not present to the same degree at any other national park, and that is noted in the purpose and significance statements on pages 9–10 of the *Draft Environmental Impact Statement.* The preferred alternative states that "the National Mall, as the premier civic space for our nation, would be refurbished so that very high levels of use could be perpetuated and the needs of visitors could be met in an energy-efficient and sustainable manner," while "its memorials and landscapes would be protected, with large areas of unprogrammed open space as defining features of the historic landscape" (DEIS, p. 83). This allows freedom of access, use, and movement throughout the National Mall.

At the same time, the National Park Service has a responsibility to preserve resources for future generations, so proposals for the National Mall will be undertaken so that the visual impact on historic resources would be as inconspicuous as possible but high levels of use could still be accommodated for First Amendment demonstrations and national celebrations. At the same time, ways would be sought to reduce the impacts of high levels of use on soils and vegetation, including turf and special tree populations such as the elm and cherry trees.

Civic Space

Comment: There would be too many new ancillary structures on the National Mall, which could undermine its historic integrity.

Commenter: National Trust for Historic Preservation

Response: The current impact on the historic landscape of high use levels that were never envisioned 100 years ago is already too great. The *Draft Environmental Impact Statement* finds that the continuation of current impacts would be long-term, major, and adverse as a result of facilities not having been designed for civic activities and high levels of use.

New facilities under the preferred alternative would be carefully designed and placed to respect the historic integrity of the National Mall. Projects would also undergo additional compliance with the NHPA section 106 consultation process. Civic infrastructure would be outside primary vistas and viewsheds.

Visual impacts of additional paved spaces would be mitigated with subtle grade changes. This approach would follow the precedent of other historic plans for the National Mall. For example, the 1930s grading plan for the Mall proposed by Frederick Law Olmsted Jr. and examined by Heritage Landscapes (an NPS consultant) shows that the turf panels on the Mall at that time were crowned and curbed, while walks and circulation pathways were lowered. Curb corners had a 13- to 15-foot radius to protect turf and facilitate good circulation. Crowned turf also promotes good drainage, while from ground level views would be of a continuous swath of green turf (tapis verte), a significant feature of the Mall.

Costs and Funding

Fund What Is Needed

Comments: Money should be spent to develop facilities, update and provide infrastructure, and handle the number of visitors.

Commenter: National Turf Grass Federation, individuals

Response: The National Park Service is committed to taking care of the properties under its jurisdiction, and the preferred alternative presents a coordinated and comprehensive written program for future action to protect this treasured and historic American landscape. However, completing the plan does not ensure that all actions will take place or that funding will be forthcoming.

Don't Spend Any Money

Comment: There is nothing wrong with the way the National Mall is now. The government and the National Park Service should not be spending any money at this time because of other needs (recession, homelessness, lack of medical care, insufficient jobs).

Commenters: Anonymous comments

Response: As stated in the *Draft Environmental Impact Statement,* the National Mall was not designed for the level of use it receives, facilities and infrastructure are aging, and at the same time it contains the great symbols of our nation. When planning began in 2006, the National Park Service had identified around $450 million in deferred maintenance or repairs. Much of this total is due to aging infrastructure. It is helpful to remember that some of our most cherished symbols — the Capitol and the Thomas Jefferson Memorial — were completed during times of war because these projects were symbolically important to our national identity and spirit. Projects developed during economic downturns include the Mall (1930s) and D.C. War Memorial (1931, 1939).

Plan Costs

Comments: What is the cost of the plan?

Commenter: Anonymous comment

Response: Conceptual costs are discussed in the *Draft Environmental Impact Statement* on pages 132–33; operating budgets are discussed on pages 348–49. Table 4 on page 133 illustrates the relative magnitude of costs for each alternative. These costs are only conceptual to show a relative difference between alternatives; actual costs when projects are ready to be started may be higher or lower. As stated on page 132, "The implementation of the approved plan, no matter which alternative is selected, will depend on future NPS funding levels and servicewide priorities, and on partnership funds, time, and effort. The approval of the plan does not guarantee that funding and staffing needed to implement the plan will be

forthcoming. Full implementation of the plan could be many years in the future."

Visitor Fees

Comment: The National Mall should be used to generate money, and its use should be paid for by charging visitors.

Commenter: Anonymous comment

Response: The National Mall is open to the public, and public law stipulates that no fees may be charged for any unit of the national park system in Washington, D.C. (16 USC 6802).

Facilities

Too Many Proposed Facilities

Comment: Concentrating facilities in areas managed by the National Park Service results in too many facilities. Needed facilities should be located on surrounding museum or federal grounds.

Commenters: The Committee of 100 on the Federal City, D.C. Preservation League, National Coalition to Save Our Mall, National Trust for Historic Preservation, Society of Architectural Historians — Latrobe Society,

Response: All facilities would be sited to reduce impacts. The National Mall is large and primarily a walking environment, so it is important that visitor facilities be better dispersed. In accordance with best practices used at other high-use public areas, multipurpose facilities are proposed rather than single-purpose facilities. There has been a history of designing facilities for the National Mall that end up being too small and fail to meet visitor needs (e.g., food service without restrooms). This has resulted in unacceptable resource damage or pressure for additional facilities.

Tourism Congestion Management at Natural and Cultural Sites (World Tourism Organization 2004) identifies successful approaches to developing facilities and managing congestion around the world. At the Louvre this included providing a large new paved entry courtyard (the Pei pyramid), conserving historic buildings, developing additional visitor facilities underground, and dispersing smaller visitor facilities such as food service and restrooms to avoid congestion. The document also states the following: "Particular care should be devoted to preserving and upgrading monuments, shrines and museums, as well as archeological and historic sites which must be widely open to tourist visits. . . . Site managers and staff need to carefully monitor the way the visitors interact with the site. . . . When crowd management techniques are likely to adversely impact on the important values of the destination or site, consideration should be given the relocating the proposed event to another, less sensitive venue."

Needed facilities should not intrude on the special quality of the National Mall. Currently, the National Gallery of Art's food services and restrooms are available 363 days each year. The Smithsonian Institution also provides access to food service and restrooms in their museums throughout the year. Additional access might be able to be provided to the food court of the National Air and Space Museum, and the Smithsonian Institution has indicated a willingness to consider this, although the additional cost for security would need to be accounted for. The U.S. Department of Agriculture has stated that because of security concerns unescorted visitors could not be allowed to use restrooms in the Jamie L. Whitten Building. NPS managers would continue to work with the Smithsonian Institution and the National Gallery of Art to increase access to existing or proposed facilities.

NPS staff also contacted management staff at adjacent facilities about locating restrooms or additional visitor service facilities in front of their buildings. However, the buildings of the Smithsonian Institution, the National Gallery of Art, and the Department of Agriculture are either signature or historic buildings, and adding new facilities on their property would adversely change their character. Additionally there are security concerns about this idea since suggested locations would be inside perimeter security for buildings and would put an added burden on already stretched security staff of the groups affected. The Smithsonian Institution has stated, "Most importantly, museum grounds represent valuable assets that are reserved for current and future museum programs and related activities. They should not be traded away, when other avenues are readily available." The National Gallery of Art has stated that they have no intentions or plans "to construct additional facilities on the grounds of the East or West Buildings or the

Sculpture Garden, . . . which are significant works by major American architects or landscape architects, and each of which the Gallery maintains as designed." Similarly, the U.S. Department of Agriculture has stated that "due to the historic significance of the Whitten Building and its presence on the Mall, [we do not] foresee a suitable location for public restrooms on the federal grounds."

Temporary vs. Permanent Structures

Comment: Temporary facilities should be used rather than constructing permanent facilities. All facilities, including restrooms, should be outside view corridors.

> *Commenter:* The Association of the Oldest Inhabitants of the District of Columbia, National Trust for Historic Preservation, Public Hygiene Lets Us Stay Human (PHLUSH)

Response: The proposed plan carefully balances the need for temporary and permanent facilities so that current and expected levels of use can be accommodated without having the National Mall appear to be a constant construction zone. The National Mall hosts thousands of events annually, each requiring various levels of support. The volume of almost continuous use has resulted in a near constant proliferation of temporary facilities, such as toilets. Portable toilets are unacceptable to most women and children, and the accompanying odor is unpleasant for nearby visitors.

Multipurpose facilities rather than single-purpose facilities are proposed to reduce the number of new structures. As stated in the *Draft Environmental Impact Statement* on page 83, "The National Park Service would ensure compatible and enduring high-quality design, as well as the highest facility maintenance standards, to create a sense of place that would reinforce the civic, historic, and symbolic role of the National Mall to our nation."

We agree that visitor facilities should not distract from memorials, historic views, or vistas. All facilities would be sited to reduce impacts and would be outside primary and secondary vistas and views. Facilities would undergo design reviews and additional historic preservation consultations.

First Amendment Concerns

Comment: First Amendment rights may be limited or restricted to specific locations. A few allege that planning is a subversive plot to stifle free speech.

> *Commenters:* The Committee of 100 on the Federal City, John Coghlan, Brian Daniel, Sherrill Futrell, Carl Hames, Andrew Kalukin, Lisa Landis, Brian Simpson, Jon Spinac, John Milius Truesdale, Daniel Wemhoff

Response: We agree on the importance of the National Mall as a venue for political speech and that demonstrations should not be restricted into any one area. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."

The First Amendment and civic space are educational topics identified in the draft document (see pp. 85 and 172, actions for row 6.2). To enhance public information, a new NPS brochure, *The First Amendment on the National Mall,* was published in April 2010. It highlights key sites for freedom of speech and includes cell phone tour call-in numbers at six locations.

Gravel Walkways

Accessibility of Gravel Walkways

Comment: The gravel walkways are difficult for people pushing wheelchairs or strollers, or for visitors who have difficulty walking.

Commenters: Regina Carelli, Sydney Jacobs, various anonymous comments

Response: Gravel does not meet standards for accessibility, and the National Park Service has received numerous accessibility complaints over the years about gravel surfaces, including public comments made on the *Draft Environmental Impact Statement*. When gravel gets scattered on top of adjacent paved accessible walks, visitors find the surfaces become slippery. The open nature of the Mall also makes dust a significant problem, and visitors have repeatedly complained about breathing difficulties and dust in eyes. Additionally gravel can be uncomfortable for walking because the gravel can be felt through shoes.

Comments also suggest that the National Mall should be a showcase or role model for universal accessibility. There is no place in our country that should be more inclusive or easier for every person to get around. We concur because of the symbolic and civic importance of the National Mall to all citizens and its generally flat terrain.

To comply with the requirements of the Architectural Barriers Act Accessibility Guidelines (sec. 302.1), walkway surfaces need to be "stable, firm and slip resistant" and "unchanged by contaminants or applied force, so that when the contaminant or force is removed, the surface returns to its original conditions. A firm surface resists deformation by either indentations or particles moving on its surface. A slip-resistant surface provides sufficient frictional counter force to the forces experienced in walking to permit safe ambulation" (U.S. Access Board 2003). To reflect these comments, a plan objective has been added that states, "The National Mall is a showcase of inclusiveness and universal design."

Historic Use of Gravel

Comment: George Washington chose the gravel.

Commenter: Anonymous comment

Response: The gravel dates back to the 1970s, not to George Washington's era. In the 1930s four parallel asphalt roadways had adjacent concrete paved walkways.

Permeability and Sustainability

Comment: Gravel, and granular stone are permeable and sustainable materials that should be retained or their use expanded.

Commenters: U.S. Commission of Fine Arts, American Society of Landscape Architects, individual comments

Response: The National Park Service is highly interested in sustainable approaches to paving materials. However, gravel and stone dust paving are not the only sustainable approaches. The present compacted gravel pathways are not permeable since they were placed over former roadbeds. 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.

As gravel migrates into the grass panels on the Mall, turf quality is affected, as well as erosion, soil compaction, and irrigation. A pervious surface is not able to withstand a high volume of foot or vehicular traffic or weather conditions. A stable (hard-packed) surface that can support present types and volumes of use is not pervious.

Pleasing Appearance and Texture of Gravel

Comment: The appearance and texture of gravel is attractive.

Commenters: U.S. Commission of Fine Arts, American Society of Landscape Architects, individual comments

Response: The color, appearance, and texture of gravel are seen as desirable, and the *Streetscape Manual* (Interagency Initiative for National Mall Road Improvement Program 1992) included various look-alike coordinated paving elements, including an exposed aggregate concrete sidewalk, step-out curb border, and bus stops. This initiative has been updated since 1992. The preferred alternative presented in the *Draft Environmental Impact Statement* proposes developing a palette of coordinated paving materials to function effectively for various types of uses, including jogging, walking, and bicycle riding, as well as events and heavy vehicular use.

Maintainability and Cost

Comment: Stone dust or gravel, if properly installed, is easy to maintain and low cost.

> *Commenters:* U.S. Commission of Fine Arts, American Society of Landscape Architects, individual comments

Response: According to the Unified Soil Classification System, the pathways are currently classified as well-graded gravel (ASTM D 2487-85). Given the high volume and variety of use on the National Mall, the National Park Service has found over the last 40 years that gravel surfaces are not easy to maintain. Maintenance problems are further exacerbated by vehicles being driven on pathways for both maintenance and permitted activities. Constant gravel migration results in humps and depressions, and snow cannot be removed without digging into the gravel. Gravel migrates into turf, drains, and piping, clogging systems and violating Clean Water Act standards. Over time gravel walkways becomes impermeable, resulting in ponding water and icing.

There are approximately 18 acres of gravel walks on the Mall. Maintenance crews maintain existing gravel pathways by regrading, rolling, vibrating, and compacting existing gravel (including north-south and east-west walkways between 3rd and 14th streets and Jefferson and Madison drives). All of the gravel walkways on the Mall are treated annually. Work includes regrading existing gravel; installing gravel as necessary to fill low spots; and grading, rolling, vibrating, and compacting new gravel. The park has a five-year contract for purchasing gravel, with 400 tons scheduled for fiscal years 2010–2013 at approximately $55,000 per year. However, in 2009 about 1,200 tons of gravel were installed.

Properly preparing walks to be resurfaced with a suitable gravel surface would require all walks to be rebuilt. Approximately 4,000 tons of material would be needed, plus 500 cubic yards of a gravel binder / polymer, for an initial cost of $685,000. One-time equipment costs to properly apply and maintain the gravel would be about $245,000. Annual labor costs are estimated at $555,000. Daily maintenance would be required to prevent trip hazards, pot-holing, and water ponding. Annual labor and material costs would exceed $1.25 million.

Information from Nearby Sites. As a result of comments, the National Park Service solicited information about maintenance practices at the National Gallery of Art (NGA) Sculpture Garden and the U.S. Botanic Garden (USBG) National Garden.

Nearby 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.

At the NGA Sculpture Garden stone dust has been used on the pathways, while at the USBG National Garden gravel is stabilized by a visible circular grid. The levels of visitation and types of use in these areas are not comparable to what occurs on the National Mall, which has an estimated 20–25 million visits annually. Estimates at the Sculpture Garden and the National Garden are about 1 million visitors per year, about 5% of the National Mall's annual visitation.

At the Sculpture Garden no heavy vehicles, major deliveries, or special events are allowed on the garden paths, while at the National Garden smaller maintenance vehicles are allowed, although turns by a track vehicle or front-end loader can loosen the base. Both areas have experienced problems with particles migrating away from the paths. At the National Garden gravel is kicked by pedestrians and thrown by children, and a raised edge is needed to contain it. USBG staff rake the paths regularly. At the Sculpture Garden liriope is used in to control migration into grass and reduce hand raking and the removal of stone dust.

At both sites snow removal is difficult with either shovels or equipment. At the National Garden the paths drain well, and no new material has been added since the garden was completed in October 2006. However, there have been problems with leaching stone dust raising the soil PH. At the Sculpture Garden the paths are not very porous, and fines move due to wind, rain, and foot traffic. Currently NGA representatives said they intend to take additional steps to control migration using a soil stabilizer or binder.

When asked if they would use gravel again, the USBG representative said, "Probably not, unless there was a binder to use. A permeable, but rigid, substrate such as concrete is what we would likely use. That would make snow removal, maintenance, etc. much easier." They are planning to

experiment with a binder this summer. If a non-permeable paving was used, it would still be possible to capture water from the walkways and divert it into ground storage. This was done at the National Cathedral's Olmsted Woods around 2000.

A Suitable Jogging Surface

Comment: Gravel provides an appropriate surface for jogging and running.

Commenters: Anonymous comments

Response: The National Park Service is proposing to use a coordinated palette of paving materials to create surfaces suitable for various uses, including running. Compacted gravel paths can be as hard as concrete to run on, and many runners may prefer a softer surface, which various new materials may offer. Social trails along the shaded side of gravel walkways appear to have been caused by runners, indicating that many runners do not find gravel to be an appropriate surface.

Landscape Conditions

Comment: Current landscape conditions are deplorable. Plants require adequate resources, guided by the application of basic knowledge of biology and agronomy. Turf areas should be like a high performance athletic field.

Commenters: National Turfgrass Federation, individual comments

Response: The impact analysis under the no-action alternative with regard to soils and vegetation concludes that continued impacts would be long-term, major, and adverse and that this level of impact would be unacceptable. This conclusion reflects the serious existing conditions on the National Mall, and it is much more than just a matter of appearance. It also involves the health and sustainability of the urban ecosystem because these conditions affect runoff and flooding, air quality, normal vegetative growth and disease resistance, greenhouse gas emissions, and groundwater recharge.

National Mall Purpose and Concepts

Comments: The National Mall's symbolic quality is not reflected in the plan, and its unique qualities and roots in the L'Enfant and McMillan plans are not acknowledged.

Commenter: National Coalition to Save Our Mall

Response: The plan is built on the L'Enfant and McMillan plans, and the preservation of the overarching visions of these plans is fundamental to the proposed plan. This has been acknowledged in newsletters, background papers that were posted on the plan website (www.nps.gov/nationalmallplan), public meetings and presentations, as well as the *Draft Environmental Impact Statement* (for example, see pp. 10, 11, 14, 21, 28, 42, 72, 83, 150, 251–59). The significance statements on page 10 articulate the importance of the National Mall as a civic stage and symbol of American identity. The statements of purpose and significance are integral to the foundation statement for the National Mall.

Planning Area and Approach

Comments: People define the National Mall differently. The planning document is only concerned with areas under the jurisdiction of the National Park Service, not adjacent areas. As a result, the National Park Service has failed to address the National Mall comprehensively and planning continues to be fragmented. For example, the McMillan plan also addressed the White House and areas north and south of the National Mall. There is no statutory definition of the National Mall.

Commenters: The Committee of 100 on the Federal City, National Trust for Historic Preservation, National Coalition to Save Our Mall, D.C. Preservation League

Response: The proposed plan presents a vision plan for the National Mall, which includes all areas except those occupied by the Smithsonian Institution, the National Gallery of Art, and the Jamie L. Whitten Building of the U.S. Department of Agriculture. Nevertheless, the plan vision is for the entire area and is compatible with other vision plans for this area, including the NCPC *Extending the Legacy* plan (1997), the *Center City Action Agenda* (District of Columbia 2008), the NCPC *Memorials and Museums Master Plan* (2001), and the NCPC *Monumental Core Framework Plan* (2009). The NCPC *Legacy* plan is the successor to earlier plans, such as the L'Enfant and McMillan

plans (see DEIS, p. 42), and other plans are all compatible with the *Legacy* plan. The National Park Service considers the National Mall plan to be one of the implementing plans for the *Legacy* plan.

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 for the areas covered in the McMillan plan.

It is true there is no legislative definition of the National Mall. In 2005 the National Park Service changed the name of the park unit responsible for the management of the National Mall from National Capital Parks–Central to the National Mall and Memorial Parks to better fit with general public understanding. The terms 'Mall,' 'National Mall,' 'White House,' and 'President's Park' are defined in the plan glossary (DEIS, pp. 580–84) and have been used consistently since 2005.

As the result of commemoration, areas have been subdivided and the National Mall now has a number of legislatively defined units for memorials.

Over time some areas have retained a link to definitions in the "Mall Systems" referenced in the McMillan plan, while other area names have changed.

- The White House Division is now referred to as the White House and President's Park and is a separate unit of the national park system with its own current plan adopted in 2000.
- The Capitol Division is now referred to as the U.S. Capitol Complex and is larger than what was considered in the McMillan plan. In a letter dated February 23, 2010, to the National Capital Planning Commission, the Architect of the Capitol stated his office was the steward of "adjacent lands" to the National Mall.

As discussed during NHPA section 106 consultations, the National Register of Historic Places nomination for the National Mall, which currently covers only the Mall area, would be updated and expanded to include all areas of the National Mall (i.e., areas not previously included in the existing nomination). The programmatic agreement would cover this topic as part of mitigation.

ADEQUACY OF THE ENVIRONMENTAL ANALYSIS

Accessibility

Comment: Accessibility for visitors has not been addressed adequately.

> *Commenters:* Dan Gamber, Sydney Jacobs, various anonymous comments

Response: The *Draft Environmental Impact Statement* includes multiple references to accessibility, along with facilities and programs for visitors with disabilities, as indicated by index entries. Also see pages 85, 86, 178 (actions for row 7.4), and 184 (row 8.3). The proposed plan covers universal accessibility to places, programs, parking, wheelchair rentals, and supplementary transportation. Because of the symbolic and civic importance of the National Mall to all citizens, and its generally flat terrain, the National Mall should be our country's preeminent example for inclusiveness and universal design. To reflect these comments, a plan objective has been added that states, "The National Mall is a showcase of inclusiveness and universal design."

Climate Change

Comment: Why isn't global warming discussed in the plan? It should be better addressed than on page 158.

> *Commenters:* The Committee of 100 on the Federal City, individual comments

Response: The impacts of climate change and global warming are addressed in the *Draft Environmental Impact Statement* on pages 39–40, under "Environmental Impact Topics Dismissed from Further Consideration" because implementing any of the alternatives described would have very little effect on the cumulative level of greenhouse gas emissions or other climate change factors in the District of Columbia.

While climate change models have provided projections of changes to environmental effects, such as temperature and sea level changes, scenario planning has not been conducted for the National Mall area with the most current model

projections. New modeling systems are expected in the fall of 2010. The most likely potential effects are sea level rise due to temperature increases and large storm frequency and magnitude. Potential effects would best be considered during the next stages of planning, and mitigations could include adaptive management where measures for climate change effects would be linked to design and thresholds that would signal a need to change the design or use. Future plans for the riverfront and the Tidal Basin would include approaches to be consistent with the most current climate change science.

Elm Trees

Comment: Additional scientific studies are needed to determine what level of use can occur under the elm trees on the Mall while sustaining tree health.

> ***Commenters:*** Smithsonian Institution, National Coalition to Save Our Mall

Response: 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 *Management Program for the Perpetuation of the American Elm Tree in the National Capital* (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 grass and tree panels.

The management of urban trees, including elms, has been intensively studied and documented, and the National Park Service will continue to consult with recognized authorities to use the best available science and current conditions to manage for the continued health of natural resources on the National Mall, including turf, trees, and soil. Based on public comment, additional scientific study would be undertaken to examine the health of the elm trees and soil conditions on the Mall, and to identify appropriate levels of use and protection. It is prudent to implement careful strategies, including less direct human impacts, to highly visible trees that are part of the historic landscape and that have been identified over the years as stressed.

Events

Comments: A systematic study of events is missing. The plan seeks to protect the Mall's landscape by limiting all events, rather than striving for a balance between use and preservation.

> ***Commenters:*** Smithsonian Institution, National Coalition to Save Our Mall

Response: Additional data about events have been added to the *Final Environmental Impact Statement.* The National Park Service mapped 2009 permitted events for the Mall and the Washington Monument grounds (except the Presidential Inauguration) with an estimated attendance of more than 1,000. Maps show total volume of use, area of use, season of use, and use-days. This information has been added to the "Affected Environment: Demonstrations, Special Events, and National Celebrations." A table has also been developed for 2008/2009 events based on permit applications.

Developing a proposed computer mapping-based reservation system (see DEIS, pp. 184 and 62, actions for row 4.4) would allow the National Park Service to efficiently schedule permitted activities, general use, and recovery/restoration times, as well as to quickly assemble information about use.

Several activities on the Mall are enjoyed by thousands and cause substantial impacts. The National Park Service is seeking ways to reduce the impacts of such events in order to allow them to continue. One strategy is to design and disperse spaces for events. Another is to change the timing of events, such as the Smithsonian Folklife Festival, which is held during the mid-summer when hot humid weather creates pressure to use shaded areas. Excessive heat and humidity are not issues during the spring and fall. For example, the springtime National Cherry Blossom Festival is the most well attended annual event on the National Mall, and hundreds of thousands of visitors enjoy the cherry blossoms around the Tidal Basin, the Washington Monument grounds, and East Potomac Park. As a result of relocating event facilities for the National Cherry Blossom Festival to paved space over the last few years, damage to the historic landscape

has been reduced, despite the narrow walkways that are not designed to handle crowds.

Future Changes on the National Mall

Comment: The National Park Service is accepting the National Mall as an essentially "completed work of public art." This indicates that the National Park Service is not taking a visionary approach similar to the McMillan plan. This plan is little more than a maintenance plan.

> *Commenters:* D.C. Preservation League, National Coalition to Save Our Mall, National Parks Conservation Association

Response: The proposed plan presents a vision plan for the National Mall that is compatible with other vision plans for this area, including the NCPC *Extending the Legacy* plan (1997), the *Center City Action Agenda* (District of Columbia 2008), the NCPC *Memorials and Museums Master Plan* (2001), and the NCPC *Monumental Core Framework Plan* (2009). The NCPC *Legacy* plan is the successor to earlier plans, such as the L'Enfant and McMillan plans (see DEIS, p. 42), and other plans are all compatible with the *Legacy* plan.

Despite landmark plans for Washington, D.C., it was clear by the beginning of the 21st century that the National Mall was never designed for present levels of civic use, tourism, recreation, and cultural activities. When this planning effort began, memorial proposals being considered in Congress or proposed by various groups frequently mentioned the need to be on the National Mall. It was clear that the continuation of present conditions would be unsustainable, along with degraded natural resources, aging infrastructure, congestion, and unmet visitor needs. When planning began, there was more than $450 million in deferred maintenance.

The proposed National Mall plan is a vision plan that provides a coordinated and comprehensive written program for future action to protect this significant and historic landscape. It has been prepared with public involvement and environmental analysis in accordance with the National Environmental Policy Act. The National Mall plan provides a cohesive guideline for future management by addressing physical development needs as well as resource protection, the civic forum, circulation, visitor enjoyment, and park operations.

The proposed National Mall plan includes actions that are vastly more than a maintenance repair plan. Because the National Mall is our nation's primary civic space, a beloved symbol of our country, and a commemorative landscape, with possibly the highest concentration of museums in the world, high use levels will continue and demands on the civic space will be enormous. However, the National Mall is different from most of the world's other great civic spaces, which are most frequently hard-surface plazas and squares that are not as easy to damage. The National Mall is a designed landscape whose primary characteristics include turf and trees, and these natural components require far more care.

The bold proposals in the National Mall plan include re-envisioning Union Square, increasing civic uses in a manner that retains the visual appearance of a continuous landscape, rethinking single-purpose visitor facilities and better dispersing them, and focusing on improved multimodal circulation with more pleasant pedestrian and bicycling opportunities. These visions respect the past while preparing for the future. As such they are bound to generate some controversy. Reconciling competing needs and constituencies can be a challenge. The National Park Service is honored to be entrusted with caring for America's treasured places, including the National Mall, and the proposed plan is fundamental to our responsibility. Its purpose is to provide a coordinated and comprehensive written program for future action prepared with public involvement and NEPA environmental analysis.

Defining a great American civic space within a designed landscape may seem like an oxymoron, but it truly represents the importance of land and citizens together as a national story. The National Mall plan is a chapter in an ongoing story of our nation's capital.

Level of Detail

Comment: The document is either too prescriptive or there is not enough detail.

> *Commenters:* D.C. Historic Preservation Office, The Committee of 100 on the Federal City, National Parks Conservation Association

Response: The goal of the preferred alternative is to provide sufficient guidance for future design teams without being too prescriptive. As stated in the *Draft Environmental Impact Statement* on pages iii and 3–4, subsequent design and construction documents will be prepared to detail how to achieve the plan objectives. This phase would generally include standard procedures for site-specific design, commission reviews, public engagement, historic preservation consultation, and appropriate level of compliance.

Restrooms

Underground Restrooms

Comment: Underground restrooms should be developed.

> ***Commenter:*** Anonymous comment

Response: The high water table throughout the National Mall makes underground facilities difficult to provide. Further, this suggestion may conflict with suggestions that the National Mall should be both a role model of best design in terms of urban public restrooms and universal accessibility because underground restrooms would require the use of elevators. There has also been an unwillingness of visitors to use NPS or concession facilities that have been provided underground on Pennsylvania Avenue (Pershing Park) and the Ellipse in President's Park.

Safe, Accessible, Easy-to-Clean Restrooms

Comment: Restrooms should be safe, accessible, attractive, easy to clean, comfortable, and efficient

> ***Commenters:*** American Restroom Association, Public Hygiene Lets Us Stay Human (PHLUSH), Kathryn Anthony

Response: The goal is to have facilities that are convenient, comfortable, safe and easy to maintain.

Restrooms in Adjacent Facilities

Comment: Instead of providing so many visitor facilities on the National Mall, restrooms should be provided on the grounds of adjacent museums or government buildings.

> ***Commenters:*** The Committee of 100 on the Federal City, D.C. Preservation League, National Coalition to Save Our Mall, National Parks Conservation Association, National Trust for Historic Preservation

Response: See the response under "Facilities" on page 11.

Transportation

Comment: Transportation links to other areas are important. The plan does not address circulation and is therefore not comprehensive.

> ***Commenters:*** The Committee of 100 on the Federal City, National Coalition to Save Our Mall

Response: The *Environmental Assessment: Washington, D.C., Visitor Transportation Study for the National Mall and Surrounding Park Areas* (the *Visitor Transportation Study*; NPS 2006a) discussed various circulation options for the National Mall, and the *Draft National Mall Plan / Environmental Impact Statement* stated that all alternatives would be consistent with the proposed transportation service (DEIS, p. 47). The cumulative impact analysis under "Environmental Consequences: Access and Circulation" further explained the interrelationships between the two documents (see DEIS, pp. 448–49). Circulation maps were prepared to show interrelationships between the National Mall and the District of Columbia. We believe this analysis is adequate.

The "Access and Circulation" section of "Environmental Consequences" (DEIS, pp. 441–67) includes ideas, suggestions, recommendations, and revisions based on comments from the Washington Metropolitan Area Transit Authority, the D.C. Department of Transportation, the D.C. Office of Planning, the National Capital Planning Commission, and the U.S. Commission of Fine Arts. This section discusses cumulative circulation projects by others, as well as transportation goals and policies within Washington, D.C. (DEIS, p. 442), and relevant NPS policies (p. 443). Some minor revisions of text have been made based on WMATA comments on the *Draft Environmental Impact Statement*. Also see the comment letter from the Washington Metropolitan Area Transit Authority (letter 11).

Visitation

Comment: Visitation projections are inadequate; more information is needed.

Commenter: The Committee of 100 on the Federal City

Response: The visitation projections shown in the *Draft Environmental Impact Statement* (pp. 321–22) take into account three different projections of future visitation based on historic trendlines. Future visits are projected to increase by 25 million to 43 million visits annually over the next 20 years. These projections are adequate for this level of vision planning. The National Park Service and others will continue to examine visitation numbers and projections, as well as gather information about visitors. The Park Service is continually refining its data-gathering techniques because of the unique open nature of the National Mall, which makes it nearly impossible to count every visitor or participant in permitted activities.

OTHER REASONABLE ALTERNATIVES

Access and Circulation

Close Streets

Comment: Streets such as 3rd Street, and Jefferson and Madison drives, should be closed, as proposed in the 1960s.

Commenter: Jon Bussard

Response: The I-395 tunnel replaced the ceremonial boulevard which would have resulted from closing 3rd Street.

The Skidmore, Owings and Merrill plan also proposed removing private vehicles and parking from Madison and Jefferson drives. This goal is reiterated in the proposed National Mall plan as a long-term goal (see DEIS, pp. 90 and 204, actions for row 11.5). In the short-term free parking on these drives would be converted to metered parking, as recommended by the *Visitor Transportation Study* (NPS 2006a).

Metro Access

Comment: Better public access is needed to National Mall locations. A multimodal transit network is needed to reliably move people around the National Mall.

Commenters: Washington Metropolitan Area Transit Authority (WMATA), anonymous comment

Response: We agree with WMATA comments about the importance of a reliable regional multimodal transportation network to meet the needs of visitors and local residents. In addition to Metro rail and bus lines, a multimodal network could include pedestrian circulation, visitor transit (including premium buses and tour buses), streetcars, bicycle routes, rental scooters, a supplementary visitor transit service on the National Mall, taxis (including water and bicycle taxis), and Segway® Human Transporters or other motorized personal mobility devices. Specific Segway® routes have been designated for the National Mall and are shown in the *Superintendent's Compendium.* As described in the *Draft Environmental Impact Statement* on pages 70, 84–85, and 158 (actions for row 5.8), the preferred alternative supports additional access and circulation planning efforts, including joint tour bus planning with the city to better meet the needs of visitors.

The National Park Service supports the long-term NCPC goal to add a Metro stop near the Thomas Jefferson Memorial (see DEIS, pp. 43–44), and new entrances at the Federal Triangle and Navy–Archives–Penn Quarter stations.

Construct a Monorail

Comment: Add a monorail.

Commenter: Anonymous comment

Response: The concept of a monorail is similar to a tram or streetcar system, which was discussed in the *Draft Environmental Impact Statement.* The document noted on page 131 that either system typically requires power to be run through overhead lines, which would intrude on views and vistas. The document also stated that desired transportation goals can be achieved with a bus system, as proposed in the NPS *Visitor Transportation Study* (NPS 2006a), without any adverse effects on the cultural landscape. Because this proposal would duplicate less expensive and less environmentally damaging means of transportation, and because it would fail to meet the plan objective to protect historic vistas, it was dismissed from further consideration. Language in the final document has been updated to include monorail as having been considered but dismissed.

Tunnels

Comment: Roads should be tunneled under the National Mall, as proposed by the Skidmore, Owings and Merrill plans in the 1960s and 1970s.

Commenter: Jon Bussard

Response: All current D.C. vision plans desire to improve connections to the National Mall in a manner that celebrates its key central location in the city. Tunnels, however, increase separation because they make sightseeing impossible, which is an important visual connection to the symbols on the National Mall. Several tunnels were proposed for streets under the National Mall in the 1970s, including 4th, 7th, 14th, 15th, and 17th streets. However, after the construction of three tunnels (2nd, 9th, and 12th streets), it was determined that the visual impacts of tunnel portals, especially those adjacent to the National Mall, were too great. Moreover, the McMillan plan showed these streets crossing the Mall at grade, giving "needed life to the Mall" (U.S. Congress 1902, p. 45). Various alternatives considered in the *Draft Environmental Impact Statement* propose pedestrian and vehicular tunnels, including a vehicular tunnel for 14th Street (alternative C). Tunnel construction has been dismissed because of the high cost, duplication with other less costly alternatives to improve the pedestrian environment, and conflicts with current plans.

Artificial Turf

Comment: The use of artificial turf should be explored for the Mall. There are varieties that look like real turf and are low maintenance.

Commenters: Anonymous comments

Response: The National Park Service has explored using artificial turf, but it does not meet the criteria for durability, maintainability, and sustainability. Artificial turf is hotter than natural turf, and it does not meet objectives to improve water infiltration. We will continue to examine the use of new technologies to increase durability in natural turf. This topic has been added to the considered but dismissed section for the following reasons: technical infeasibility, inability to meet project objectives, and duplication of other less damaging alternatives.

ATMs

Comment: ATMs should be provided for visitor convenience.

Commenter: Anonymous comment

Response: This is a service that can be examined during feasibility and programming studies for bookstores, food service, or multipurpose facilities.

D.C. War Memorial

Comment: The D.C. War Memorial should represent D.C. participation in all wars.

Commenter: The Committee of 100 on the Federal City

Response: Several proposals to revise the statutory purpose of this memorial have been made through the commemorative works process, which includes Congress. It is not the purpose of this planning effort to intercede in this process.

Education

Interpretation of the Jefferson Pier Marker

Comment: The Jefferson Pier Marker should be interpreted with a small wayside or pavement marking.

Commenter: The Committee of 100 on the Federal City, Lindsley Williams

Response: The pier marker is regularly interpreted in programs given by park rangers on the Washington Monument grounds.

Protection and Interpretation of Vistas

Comment: Planned vistas, including those outside the National Mall, should be protected and interpreted with information and signs.

Commenter: National Capital Planning Commission, The Committee of 100 on the Federal City, Lindsley Williams

Response: The National Park Service works with the Advisory Council on Historic Preservation, the National Capital Planning Commission, the Commission of Fine Arts, and the D.C. Historic Preservation Office to protect important vistas and viewsheds. Maps have been updated to highlight additional vistas. Brochures, cell phone

tours, and maps may all be good ways of helping visitors understand that Washington, D.C., was a planned city of "magnificent distances" (as Portuguese minister-plenipotentiary Abbé Correa said in the early 1800s). Interpreting the history and development of Washington, D.C., is included as an interpretive theme at multiple sites throughout the National Mall (for example, see DEIS, p. 14).

Education about the First Amendment

Comment: Citizenship responsibilities and First Amendment rights should be highlighted.

Commenter: Anonymous comments

Response: The First Amendment and civic space is an educational topic identified in the proposed National Mall plan (DEIS, pp. 85 and 172 [actions for rows 6.2 and 6.3]). A new NPS brochure, *The First Amendment on the National Mall,* was issued in April 2010 and is now available on the National Mall. It highlights key sites to free speech and includes cell phone tour call-in numbers for six locations.

Public Restroom Standards

Comments: The National Mall should be a role model of urban public restrooms. Unisex stalls are recommended. Restrooms should be state-of-the-art urban restrooms. Restrooms should be integrated with food and other facilities. Water for hand washing and drinking should be nearby.

Commenters: American Restroom Association, Public Hygiene Lets Us Stay Human (PHLUSH), Kathryn Anthony

Response: We agree that the National Mall could be a role model for urban public restrooms. The preferred alternative proposes that restrooms be integrated with other facilities, well dispersed, conveniently located, and sized for level of use; self-cleaning restrooms may also be considered for some areas. Given the high use levels that the National Mall receives, permanent restrooms are proposed in certain areas to reduce the reliance on portable toilets, especially during permitted events. All proposed facilities must meet very high standards for sustainability. Also, all facilities would be places where stewardship messages or education could be presented.

Recreation

Comment: Additional recreation support facilities (such as drinking water and portable or permanent restrooms) should be provided in the vicinity of the volleyball courts northwest of the Lincoln Memorial.

Commenter: Iain Lowrie

Response. A small restroom facility with drinking fountains has been added under the preferred alternative for this area. Because of its location, a self-cleaning restroom might be considered.

Shaded Promenades

Comment: The concept of a continuous Mall shaded promenade was never achieved.

Commenter: National Coalition to Save Our Mall

Response: The formal landscape of the Mall, which is bordered by shade trees, is interrupted at the Washington Monument grounds. However, there are shaded walking opportunities along both Independence and Constitution avenues. There is an approved landscape plan for the Washington Monument grounds.

U.S. Park Police Stables

Comment: The United States Park Police (USPP) stables should be relocated; they are old and unsightly.

Commenter: National Coalition to Save Our Mall

Response: The relocation of the stables was not considered in the planning process because a decision on maintaining the current location had already been made (letter of August 24, 2006, and accompanying report from Secretary of the Interior Dirk Kempthorne to Chairman Pete Domenici, Committee on Energy and Natural Resources, United States Senate). The horse patrols are part of an immediate response crowd control measure, and they are available to respond to spontaneous incidents, provide security and response for the White House, and provide immediate supplemental law enforcement. The plan proposes to reduce the impact of USPP operations (parking and access) on visitors while increasing education about horse patrols and the

U.S. Park Police. Facilities would be replaced with those of a more appropriate character. Because this issue has already been addressed, it was not included in the considered but dismissed topics.

Changes or Revisions to the Preferred Alternative

Access and Circulation

Access to Potomac River Bridges

Comment: More access for bicycles and pedestrians should be provided on the Theodore Roosevelt Memorial Bridge, Arlington Memorial Bridge, and the I-395 bridges.

Commenter: City of Alexandria, Virginia

Response: The Potomac River bridge projects will be undertaken by others, and the *Draft Environmental Impact Statement* evaluated the interrelationships of these ideas. The *Monumental Core Framework Plan* recommends improved access and connections to the northwest area (see DEIS, p. 44), which would be compatible with the proposed National Mall plan and would encourage sustainable circulation methods. The text in the final document has been modified to state that under the preferred alternative, pedestrian and bicycle access to the Theodore Roosevelt Memorial Bridge would be improved.

Together the *Monumental Core Framework Plan*, the proposed National Mall plan, and D.C. pedestrian and bicycle plans have defined a cohesive vision for improved pedestrian and bicycle access and connections. One step to improve pedestrian and bicycle connections over Potomac River bridges is the Ohio Drive roadwork project, which is underway. The 14th Street bridge corridor would also address these issues. These other actions will take a much longer time to implement.

Metro Access

Comment: Metro capacity to fully meet the transportation needs of very large events on the National Mall will decrease over time, and a reliable multimodal transportation network will be essential.

Commenter: Washington Metropolitan Area Transit Authority

Response: The text under "Environmental Consequences: Access and Circulation — Impacts Common to All Alternatives, Visitor Access" (DEIS, p. 443) has been revised to reflect this comment. The result is the continued need for coordinated interagency planning related to large permitted events and demonstrations. Additional multi-modal access would relate to specific activities, and related impacts would be short-term, moderate to major, and beneficial.

Cultural Resources

Adverse Effects on Historic Properties

Comment: Proposed actions might result in adverse effects on historic properties, but this cannot be determined now.

Commenter: D.C. Historic Preservation Office

Response: We agree that the effects may not be fully determined until site-specific designs have begun. That is the purpose of ongoing consultations. The listing of projects requiring further consultation (see DEIS, Table 43, p. 547) has been updated.

Consultations

Comment: A programmatic agreement with the D.C. Historic Preservation Office and the Advisory Council on Historic Preservation needs to be completed. Possible elements were discussed in a NHPA section 106 meeting on March 9, 2010.

Commenters: D.C. Historic Preservation Office, National Coalition to Save Our Mall, National Trust for Historic Preservation

Response: The National Park Service hopes to satisfy its NHPA section 106 obligations through a programmatic agreement with the D.C. Historic Preservation Office, the Advisory Council on Historic Preservation, and the National Capital Planning Commission. We note that consultation meetings have been occurring over the past two years.

We recommend that the framework for the section 106 consultation discussions would

- stay focused on historic preservation and the avoidance, minimization, or mitigation of impacts
- not question past approved decisions

- explore alternatives consistent with the proposed National Mall plan vision

Lockkeeper's House

Comment: The Lockkeeper's House needs to retain its historic relationship to the canal site.

Commenters: D.C. Preservation League, Guild of Professional Tour Guides

Response: We agree, and this would be part of criteria for any project that considers moving the Lockkeeper's House (see DEIS, p. 378).

NRHP Nominations

Comment: There are inconsistencies in how the National Mall is defined in nominations for the National Register of Historic Places. Not all of the areas considered in the McMillan plan are included in the nomination.

Commenters: D.C. State Historic Preservation Office, Advisory Council on Historic Preservation, National Coalition to Save Our Mall

Response: There are inconsistencies. The nomination for the National Mall Historic District actually describes the area that the McMillan plan and the National Park Service both refer to as the Mall. The nomination form title is the only place where the term 'National Mall' is used.

We have proposed updating the nomination form so that it includes the entire area managed by the National Park Service as the National Mall. It is true that not all of the areas in the McMillan plan are contained in the nomination because the McMillan plan covered places throughout the District of Columbia and in northern Virginia.

As discussed in NHPA section 106 consultation meetings, the programmatic agreement with the Advisory Council on Historic Preservation and the D.C. Historic Preservation Office would cover this topic as part of mitigation.

Map Corrections/Updates

Comment: Several updates and corrections were suggested.

Commenters: D.C. Office of Planning, National Capital Planning Commission, Smithsonian Institution, U.S. General Services Administration, The Committee of 100 on the Federal City, National Coalition to Save Our Mall

Response: The following maps have been corrected or updated:

- Monumental Core Framework (DEIS, p. 43) — Legend has been corrected.
- Urban Design Framework (DEIS, p. 45) — Vistas have been added or extended on the map
- National Register Historic Districts and Properties (DEIS, p. 261) — The boundary for the Washington Monument and Grounds district has been corrected.
- Alternative maps (DEIS, pp. 80, 95, 103, 113, 123) — Inset maps showing ongoing NPS projects have been added.
- Important Vistas (DEIS, p. 268) — Secondary vistas have been added.
- Permitted Recreation (DEIS, p. 331) — Other recreation spaces have been identified, and the title has been changed to Recreational Opportunities.
- Event maps — New maps have been added to the "Affected Environment" to show the location, intensity, and times of year that events are held on the Mall and the Washington Monument grounds.
- Floodplain map (DEIS, p. 578) — The 100-year floodplain has been updated.

Park Operations

Infrastructure

Comment: The lack of accessible power for temporary events results in noise and impacts on air quality.

Commenter: John Cloud

Response: We agree about the impacts of the lack of power for temporary events, and that is one of the reasons for proposing utility infrastructure connections. See the *Draft Environmental Impact Statement*, pages 7, 84, 160 (actions for row 4.1), and 162 (actions for row 4.3).

Maintenance

Comment: The maintenance problems have been caused by the National Park Service not maintaining what they have. You need to prove you will be able to maintain it.

Commenters: Randy Leader, Doug Stone, anonymous comments

Response: The National Park Service is constantly juggling multiple demands, as described in the *Draft Environmental Impact Statement* on page 350. The level of use on the National Mall has increased dramatically since the 1960s as a result of new memorials and a large increase in the number of and attendance at permitted activities. Balancing use and preservation is challenging, and as described in the *Draft Environmental Impact Statement,* many problems have contributed to the deterioration of the National Mall's appearance. NPS staff do undertake regular maintenance operations, along with recurring, preventive, and corrective maintenance actions as needed (see DEIS, p. 349). By the time that this planning effort began, deferred maintenance had grown to more than $450 million. A significant component of the deferred maintenance cost is caused by aging infrastructure.

As proposed in the present soil and turf studies and supported by best practices (see DEIS, p. 561), maintenance operations could be improved by having several teams of highly skilled and full-time staff dedicated to addressing critical maintenance issues. These special skill teams could include a turf and irrigation team, a water features team, and an events team to better monitor and assemble data for cost recovery for damage.

Volunteers

Comment: Citizens should be taking care of the National Mall; this will save money.

Commenter: Larry Powers

Response: Volunteers do in fact play an essential role on the National Mall. As described in the *Draft Environmental Impact Statement* on pages 353–54 more than 30,000 hours are donated annually through the Volunteers in Parks program, with an estimated value of over $621,000. Volunteers include youth groups, school students, military groups, companies, and families, as well as individuals. Work ranges from skilled labor to cleanup, from painting and weeding to putting on programs. The majority of projects proposed in the plan will require technical skills that volunteers may or may not possess. We envision that private donations will be an important means for undertaking approved projects on the National Mall, along with ongoing volunteer efforts.

One opportunity would be for park staff to provide daily postings of National Mall cleanup/fix-up activities as opportunities for visitor participation.

Paving

Comment: A single paving material cannot meet all needs.

Commenters: U.S. Commission of Fine Arts, American Society of Landscape Architects

Response: We agree, and a single material is not proposed, rather a coordinated palette of paving materials that could meet the needs of various users. The text has been revised (e.g., DEIS, pp. 166, 178, 206) to clarify this.

Principles and Standards

Comment: Principles and standards should be included for the National Mall.

Commenters: Advisory Council on Historic Preservation, National Capital Planning Commission, National Coalition to Save Our Mall, National Trust for Historic Preservation

Response: Principles for planning were listed in newsletter 2, which were used in the development of planning objectives presented in the *Draft Environmental Impact Statement* (beginning on p. 4). The principles have been updated and added as appendix F in the *Final Environmental Impact Statement,* as discussed in the NHPA section 106 consultations.

Priorities for Implementation and a Development Guide Map

Comment: The National Park Service should set priorities for implementation. A map should help guide development.

Commenters: Advisory Council on Historic Preservation, National Capital Planning Com-

mission, Smithsonian Institution, The Committee of 100 on the Federal City, National Coalition to Save Our Mall, National Trust for Historic Preservation

Response: A priority listing of projects and maps will be included in either a record of decision, an NHPA section 106 programmatic agreement, or within an appendix to those documents. Since approval of the plan does not ensure funding, the priorities will be used to guide NPS funding requests.

Recreation

Comment: The plan needs to reflect that the National Mall is part of the D.C. park and open space network.

Commenter: D.C. Office of Planning

Response: The plan objective on page 7 of the *Draft Environmental Impact Statement* was revised to state that "the National Mall continues to function as an important part of the D.C. park and open space network."

Recycling

Comment: Recycling needs to be addressed in greater detail. Executive Orders 13423 and 13514 need to be added.

Commenters: National Capital Planning Commission, U.S. Environmental Protection Agency, University of Colorado Boulder

Response: While the plan deals at a vision level with the topic, park staff have been moving ahead with cost-effective, code-compliant, and convenient waste management and recycling programs. Recycling is also discussed under sustainable practices for park operations. Executive Order 13423 ("Strengthening Federal Environmental, Energy, and Transportation Management") was addressed in the *Draft Environmental Impact Statement* on page 39. Executive Order 13514 ("Federal Leadership in Environmental, Energy, and Economic Performance"), as well as Executive Order 13423, has been added to the final document under "Environmental Consequences: Park Operations — Methodology for Impact Analysis." The National Park Service is updating its practices and permit conditions for recycling at events.

Safety and Security

Comment: More guards are needed to protect memorials. New facilities demand enhanced security elements.

Commenters: Peter McCann, R. Steffens

Response: Park rangers and United States Park Police are involved with protecting memorials. The preferred alternative recommends a number of best practices, including crime prevention through environmental design, that can help address these issues. This includes seating that is not conducive to sleeping or skateboarding, plant materials that are of a certain type and height, and facilities that are designed to withstand vandalism.

Status of Ongoing NPS Projects

Comment: Updated information is needed about cumulative projects, including projects funded by the American Recovery and Reinvestment Act.

Commenter: National Capital Planning Commission, The Committee of 100 on the Federal City, American Society of Landscape Architects, National Coalition to Save Our Mall, National Turfgrass Federation, individual comments

Response: Status updates have been included in the final document about the following projects:

- *D.C. War Memorial* — The rehabilitation project has been approved, the contract has been awarded, and work is expected to begin in late summer 2010 and last until June 2011.
- *Lincoln Memorial Reflecting Pool Area* — Designs have been approved. Rather than using potable water to fill the pool, water from the Tidal Basin will be used, with backup excess water from the World War II Memorial; potable water would only be used as a last choice. A facility for filtering/recirculating water will be located in the U.S. Park Police stables area. A construction contract is scheduled to be awarded in late summer 2010, with construction beginning by the end of 2010 and expected to last 18–24 months.
- *Madison Drive Roadwork* — Resurfacing is scheduled to begin July 5, 2010, and be completed September 30, 2010.

- *Mall Soil and Turf Study (ongoing)* — In 2010, at the direction of the Secretary of the Interior Ken Salazar, a parallel study has been undertaken to restore the turf, an action that would be common to all action alternatives (the preferred alternative, plus alternatives A, B, and C). A consultant design team familiar with sports field development is beginning designs to restore the Mall turf panels. The approach will remove about 2 feet of soil and replace it with a compaction-resistant but drainable soil system. Turf panels would be crowned for good drainage. The project includes the development of a durable irrigation system that uses captured rainwater stored in underground cisterns. The system would also seek to use groundwater currently being removed from tunnels under the National Mall. This approach would help meet the goals of Executive Order 13514 to reduce the use of potable water by 26% by 2020. Since the National Mall is the highest user of potable water within the national park system, this is an important goal.
- *Martin Luther King, Jr. Memorial* — Construction is underway and expected to be completed by October 2011.
- *Ohio Drive* — Construction was begun in April 2010 and is scheduled to be completed in October 2010.
- *Potomac Park Levee* — Construction of a levee closure structure for 17th Street is scheduled to begin in October 2010 and be completed by October 2011.
- *Thomas Jefferson Memorial Permanent Security Improvements* — The project is in schematic design. Construction is scheduled to be completed by October 2014.
- *Thomas Jefferson Memorial Plaza Seawalls* — Construction began in spring 2010 to stabilize and repair the seawalls. Work is expected to be completed by June 2011.
- *Vietnam Veterans Memorial Center* — Surveys are underway and the project is in concept design.
- *Visitor Transportation Study* — The "Finding of No Significant Impact" for the *Visitor Transportation Study* was signed February 5, 2010, completing that planning effort. The National Park Service has begun discussion with the city and public transportation providers about potential partnerships to implement transportation proposals.
- *Washington Monument Permanent Security Improvements* — A screening facility is scheduled to be completed by July 30, 2012.
- *Wayfinding Signs* — A pedestrian wayfinding sign project is underway (see page 361). The coordinated sign plan has been reviewed and approved by U.S. Commission of Fine Arts and the National Capital Planning Commission, and the first phases are scheduled to be installed summer 2010.

Sustainability

Comment: More detail is needed about how sustainability is being addressed in the plan.

> ***Commenters:*** National Capital Planning Commission, U.S. Environmental Protection Agency, University of Colorado Boulder

Response: Text has been modified to provide more detail. The National Park Service's goal for the National Mall is to be a role model in sustainable best practices for 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.

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.

In addition, an objective has been added on page 8, stating, "The National Mall is a role model in sustainable urban park development, resource protection, and management, focusing on six areas: circulation, resource health, facilities, park operations, requirements and policy, and water use," Table 6 has been updated, and a planning principle for sustainability has been added (see final document, appendix F).

Union Square

Comment: Planning for Union Square needs to also address lands under the jurisdiction of the Architect of the Capitol.

Commenters: The Committee of 100 on the Federal City, National Coalition to Save Our Mall, National Parks Conservation Association, National Trust for Historic Preservation

Response: We agree, as does the Architect of the Capitol (see letter of March 18, 2010).

Washington Monument Grounds

2003 Olin Landscape Plan

Comment: The approved 2003 landscape plan for the Washington Monument grounds by the Olin Partnership needs to be implemented.

Commenter: National Capital Planning Commission

Response: The text in the *Draft Environmental Impact Statement* on pages 29, 91, and 210 (row 13.1) has been revised. The 2003 landscape plan would be updated to accommodate ongoing and proposed projects (the Sylvan Theater area, the National Museum of African American History and Culture, and the Potomac Park levee) and implemented. In order to implement the concepts for the planting plan, yearly tree plantings would continue in areas not affected by proposed projects.

Multipurpose Visitor Facility

Comment: Other sites for a multipurpose visitor facility at the Washington Monument must be considered.

Commenter: National Coalition to Save Our Mall

Response: Various sites were considered during planning and the NHPA section 106 consultation meetings. This discussion is documented in the meeting notes for April 13, 2009, which indicate general concurrence with the Sylvan Theater location.

Water Quality

Comment. Water quality in water features must be improved. The pools need to be cleaned.

Commenters: Adam Bliss, anonymous comment

Response: We agree, and the preferred alternative includes actions to accomplish this (for, example,

see DEIS, p. 154, actions for row 3.2). Also see the discussion of water use under sustainability.

Water Taxis

Comment: More discussion about water taxis is needed.

Commenter: City of Alexandria, Virginia

Response: While it is not the intent of the National Park Service to provide water taxi service, the proposed plan would accommodate them, as described in the *Draft Environmental Impact Statement* on pages 94 and 240 (actions for row 24.2). The location and design of such facilities would require further study and approvals as proposals were made. Water taxi service with transfers to other transit modes is included in the *Monumental Core Framework Plan,* as it was in the *Legacy* plan, and this has been clarified in the final document.

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SPECIFIC COMMENTS AND SUPPLEMENTAL RESPONSES

COOPERATING AGENCIES

Comment	Letter 1. Advisory Council on Historic Preservation	Response
A B	Preserving America's Heritage March 17, 2010 Ms. Susan Spain Project Executive, The National Mall Plan National Mall & Memorial Parks 900 Ohio Drive Washington, DC 20024-2000 ***Ref:*** ***Proposed National Mall Plan*** ***ACHP Comments on the Draft Environmental Impact Statement*** ***Washington, District of Columbia*** Dear Ms. Spain: 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: 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. 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. 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	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. 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.

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
C D E F	2 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. 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. 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. Sincerely, Caroline D. Hall Assistant Director Office of Federal Agency Programs Federal Property Management Section	C. The National Park Service is preparing priority listings. D. Principles for planning were listed in newsletter 2, which were used in the development of planning objectives presented in the *Draft Environmental Impact Statement* (beginning on p. 4). They have been updated and added as appendix F in the *Final Environmental Impact Statement,* as discussed in NHPA section 106 consultations. Priorities will be identified once a final plan has been approved. E. As described in the *Draft Environmental Impact Statement* (pp. 51–52), alternatives A, B, and C were developed as full alternatives before the preferred alternative was developed. 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.

Comment	Letter 2.1. Architect of the Capitol	Response
A	Washington, DC 20515 February 23, 2010 Mr. Marcel Acosta, Executive Director, National Capital Planning Commission 401 9th Street, NW, Suite 500 N Washington, DC 20004 Dear Mr. Acosta: 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. 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 *Draft National Mall Plan and Environmental Impact Statement*. 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. Sincerely, Stephen T. Ayers, AIA, LEED AP Acting Architect of the Capitol cc: Ms. Susan Spain, Project Executive, The National Mall Plan Doc. No. 100222-02-02	[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 *Draft National Mall Plan / Environmental Impact Statement*.] 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.

Comment	Letter 2.2. Architect of the Capitol	Response
A	Washington, DC 20515 March 18, 2010 Ms. Susan Spain, Project Executive National Mall and Memorial Parks ATTN: National Mall Plan 900 Ohio Drive, S.W. Washington, DC 20024-2000 Dear Ms. Spain: 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. 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.	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.
B	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.	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.

Comment	Letter 2.2. Architect of the Capitol (cont.)	Response
	Ms. Susan Spain March 18, 2010 Page 2 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. Sincerely, Stephen T. Ayers, AIA, LEED AP Acting Architect of the Capitol Doc. No. 100309-13-01	

Comment	Letter 3. District of Columbia Office of Planning	Response
A	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. 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	Incorporating Active Recreation 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 *The Affected Environment* chapter and not in the *Purpose and Need for the Plan* 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 *Introduction* section as a "Plan Objective" (pg 4), and in the *Foundation for Planning and Management* section under "Purpose" (pg 9) and "Fundamental Values" (pg 11). 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. Sincerely,  Harriet Tregoning Director, Office of Planning HT/pz/cgb 2	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 *Draft Environmental Impact Statement* 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.

Comment	Letter 4. District of Columbia State Historic Preservation Officer	Response
	GOVERNMENT OF THE DISTRICT OF COLUMBIA STATE HISTORIC PRESERVATION OFFICER ★ ★ ★  March 18, 2010 Mr. John Piltzecker Superintendent National Mall and Memorial Parks National Park Service 900 Ohio Drive, SW Washington, DC 20024-2000 RE: Section 106 Review of the Draft National Mall Plan Environmental Impact Statement Dear Mr. Piltzecker: 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). 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. 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.	
A	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.	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.
B	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.	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.
	2000 14th Street, N.W., 4th Fl., Washington, D.C. 20009 202-442-7600, fax 202-442-7638	

Comment	Letter 4. District of Columbia State Historic Preservation Officer (cont.)	Response
C	Mr. John Piltzecker Section 106 Review of the Draft National Mall Plan Environmental Impact Statement March 18, 2010 Page 2 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.	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.
D	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.	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.
E	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. 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."	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 *Draft Environmental Impact Statement* has been updated, and a priority listing will be developed once a plan has been approved.
F	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.	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.
G	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.	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.

Comment	Letter 4. District of Columbia State Historic Preservation Officer (cont.)	Response
H	Mr. John Piltzecker Section 106 Review of the Draft National Mall Plan Environmental Impact Statement March 18, 2010 Page 3 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.	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.
I	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.	I. We agree; see response 1A.
J	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. 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. Sincerely, David Maloney DC State Historic Preservation Officer	J. It was not the purpose of the *Draft Environmental Impact Statement* 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.

Comment	Letter 5.1. Federal Reserve Board	Response
	 Keith.F.Bates@frb.gov 12/28/2009 09:29 AM To Susan_Spain@nps.gov cc Marie.S.Savoy@frb.gov bcc Subject Re: Cooperating Agencies - National Mall Plan Draft EIS release this week History: This message has been replied to. Susan: You have a wonderful document, it is very well done. 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. Happy Holidays and good luck, Keith Keith Bates, P.E. Assistant Director for Facilities Tel 202-452-3720	

Comment	Letter 5.2. Federal Reserve Board	Response
	Keith.F.Bates@frb.gov 03/18/2010 04:40 PM To Susan_Spain@nps.gov cc Subject Re: National Mall Plan Comment Period ends today - March 18, 2010 Susan We have no comments. We are looking forward to the changes. Keith Keith Bates, P.E. Assistant Director for Facilities Tel 202-452-3720	

Comment	Letter 6.1. National Capital Panning Commission, Staff Recommendation	Response

STAFF RECOMMENDATION

National Capital Planning Commission

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 Panning Commission, Staff Recommendation (cont.)	Response
	NCPC File No. 6070 Page 2	
	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.	
	Supports: • 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.	A. An inset map has been added on all alternative maps to show proposed visitor transportation routes and ongoing NPS projects. B. We agree, and a listing has been developed and will accompany the record of decision.
	Recommends that the National Park Service, in the development of the final National Mall Plan:	
A	• 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.	C. The following text has been added to the *Final Environmental Impact Statement* under "Purpose of and Need for the Plan: Interrelationships with Other Projects": ***Mall Soil and Turf Study***. 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. This is an important goal because the National Mall is the highest user of potable water in the national park system.
B	• Prioritize short-term and long-term projects to support progress in the implementation of the Plan.	
C	• 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.	

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D E F	 • 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. **Further recommends** that the National Park Service: • 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. * * * PROJECT DESCRIPTION Site 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. 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.	D. The following text has been added in "Environmental Consequences: Park Operations — Methodology for Impact Analysis" to provide more detail. 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. 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. 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). E. The *Visitor Transportation Study* 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. 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).

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

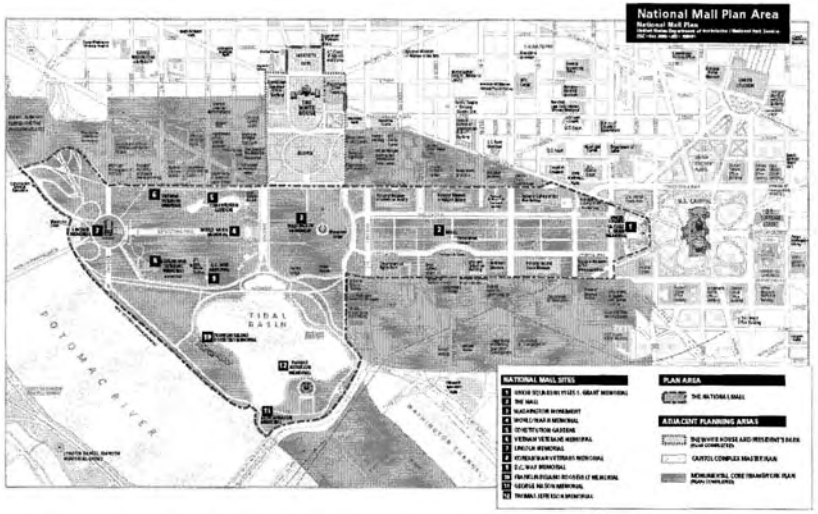


FIGURE 1: National Mall Plan Area

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.

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NCPC's 1997 *Legacy Plan* 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 *Memorials and Museums Master Plan* 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.

The National Mall Plan observes Congress's establishment of the Reserve in 2003. NPS and NCPC are currently embarked on a joint study entitled *Washington as Commemoration*, 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.

The *Monumental Core Framework Plan,* 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.

The National Park Service's (NPS) draft National Mall Plan contributes significantly to these planning efforts. In addition to the *Monumental Core Framework Plan* (*Framework Plan*), the draft National Mall Plan also complements NPS's 2000 *White House and President's Park Plan*; the District of Columbia's 2008 *Center City Action Agenda*, which redefines central Washington with the Mall as its centerpiece and advances Washington's identity as a waterfront city; and the *Capitol Complex Master Plan*, now in development by the Architect of the Capitol.

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.

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 *Legacy Plan* 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."

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

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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.

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.

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.

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.

NPS anticipates returning to the Commission for review of the final National Mall Plan in September 2010.

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.

Planning Goals - National Mall Plan

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

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

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.

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.

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.

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.

The National Mall Plan is a *framework* 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.

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.

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.

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NPS's stated goals are to:

- 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.

Other Projects on the National Mall

NPS and the Smithsonian Institution are both proceeding this year with projects funded by the American Recovery and Reinvestment Act (ARRA).

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.

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.

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.

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

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funds raised by the Trust for the National Mall. Comprehensive wayfinding is a component of all alternatives in the Mall Plan's draft EIS.

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.

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.

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.

The Hirshhorn Museum has proposed a seasonal pavilion and enhanced programming of its courtyard during two months of every year.

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.

Proposal – The Draft National Mall Plan

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.

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

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accessible restrooms, food service, and information. The draft Plan envisions more diverse opportunities for public enjoyment, including educational, cultural, and musical programs, as well as active and passive recreation.

The draft National Mall Plan's proposals are illustrated in a series of maps that will be referred to throughout this report. Because the draft document is also being used in fulfillment of NPS's obligations under the National Environmental Policy Act, the composite map illustrating the overall framework for the Plan's proposals is labeled "Preferred Alternative" and is shown as Figure 2 in this report.

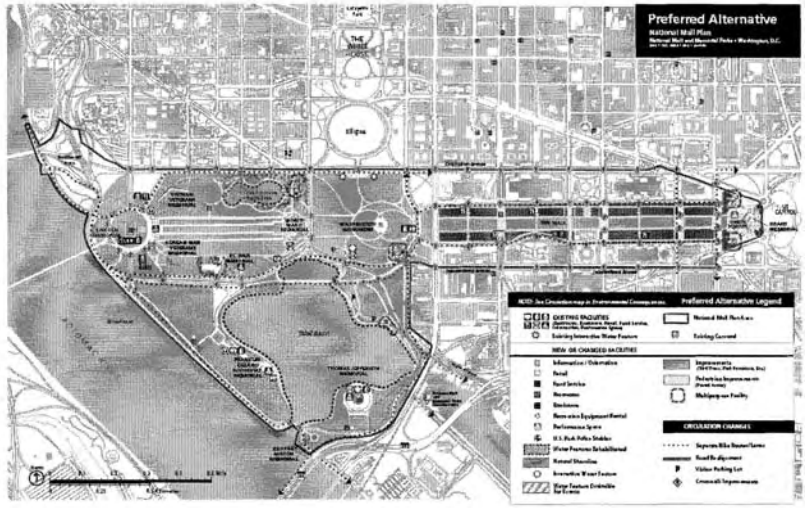


FIGURE 2: Draft National Mall Plan (also referred to as the Preferred Alternative)

Below, through page 13 of this report, is a summary of the proposals by area (east to west, and then north to south). Additional maps in the draft Plan follow. Discussion of the major proposals of the draft Plan, which are illustrated in Figure 2, follows in the "Analysis" section of this report, beginning on page 19.

The Mall

Union Square (the Capitol Reflecting Pool)

- Restore the Grant Memorial as the focal point of a symmetrical, formally laid out civic square.

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- 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.

The Mall

- 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.

Washington Monument Grounds

- 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.

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	NCPC File No. 6070 Page 12 • 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. *West Potomac Park* Constitution Gardens • 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. . Vietnam Veterans Memorial • Provide additional seating in the vicinity of the memorial for contemplation and rest. Lincoln Memorial and Grounds • 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. Korean War Veterans Memorial. • Widen the walks on the west side of the memorial to accommodate changing circulation patterns and group visitation. Ash Woods • 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.	

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Tidal Basin

- 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.

Franklin Delano Roosevelt Memorial

- 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.

West Potomac Park Riverfront

- 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.

Thomas Jefferson Memorial and Grounds

- 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.

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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.

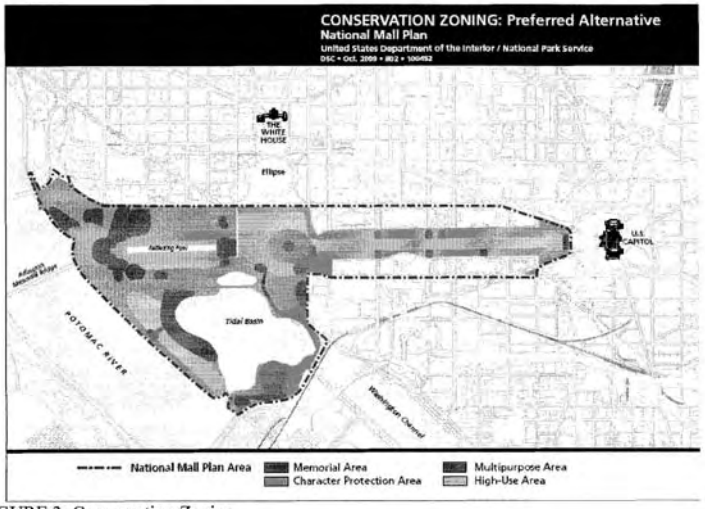


FIGURE 3: Conservation Zoning

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.

NPS issues permits for temporary *special events* 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.

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.

"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.

Circulation

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 *Washington, DC Visitor Transportation Study for the National Mall and Surrounding Park Areas*.

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

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

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.

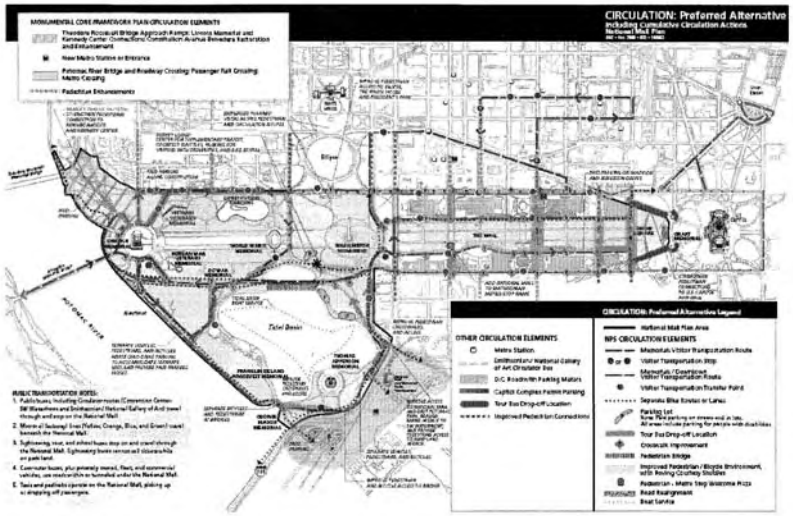


FIGURE 4: Circulation

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 tour bus drop-off locations.

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

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.

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.

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.

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.

Transportation Study Finding of No Significant Impact (FONSI)

NPS recently released its Finding for its 2006 *Visitor Transportation Study*. 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."

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.

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.

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

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.

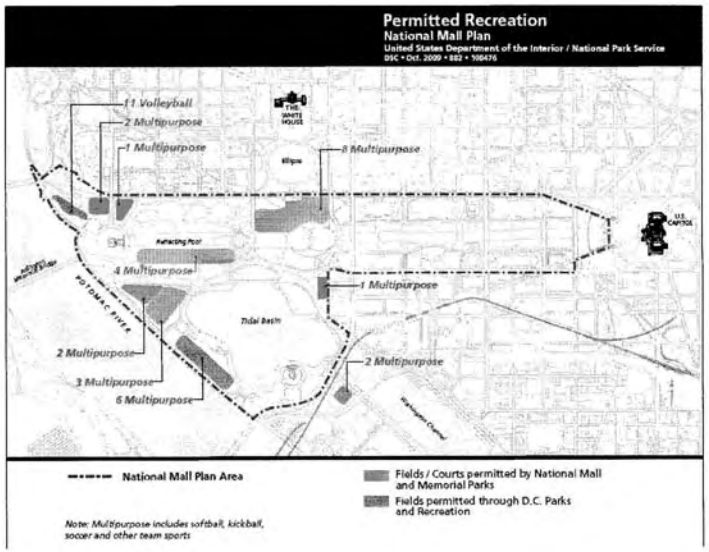


FIGURE 5: Permitted Recreation

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

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 *CapitalSpace* is to increase capacity for athletic fields in federal and District of Columbia open space.

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.

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.

PROJECT ANALYSIS

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.

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.

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.

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.

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.

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

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.

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.

Conservation of Natural Resources

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.

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).

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.

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 *special events* on the National Mall and to protect the natural and cultural resources of the Mall's historic landscape.

NPS's practice of reviewing and issuing permits for *First Amendment demonstrations* at locations requested by demonstration organizers will continue.

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

Visitor Transportation

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 tobe 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.

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.

Improvements in Visitor Amenities

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.

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.

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.

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

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.

Redevelopment of the Capitol Reflecting Pool as Union Square

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.

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. .

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.

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.

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

Accessibility

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.

Improvements to the Bicycle Path Network and Athletic Fields

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.

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.

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 *CapitalSpace* goals.

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.

The National Mall as a Sustainable Urban Park

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

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

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.

NPS summarizes its sustainability goals as follows:

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.

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.

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.

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.

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).

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.

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

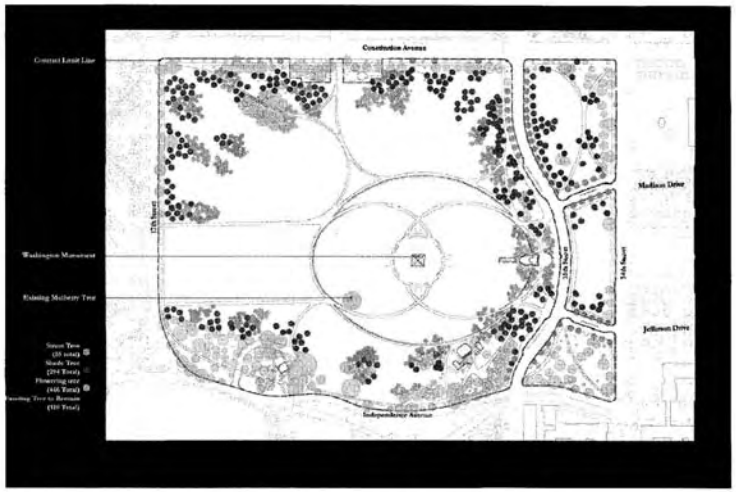


FIGURE 6: Olin Landscape Plan for the Washington Monument Grounds

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 Panning Commission, Staff Recommendation (cont.)	Response

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.

Parks and Open Space Element

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.

Environment Element

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.

Preservation and Historic Features Element

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.

Transportation Element

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

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.

National Environmental Protection Act (NEPA)

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.

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.

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.

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.

National Historic Preservation Act (NHPA)

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

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

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.

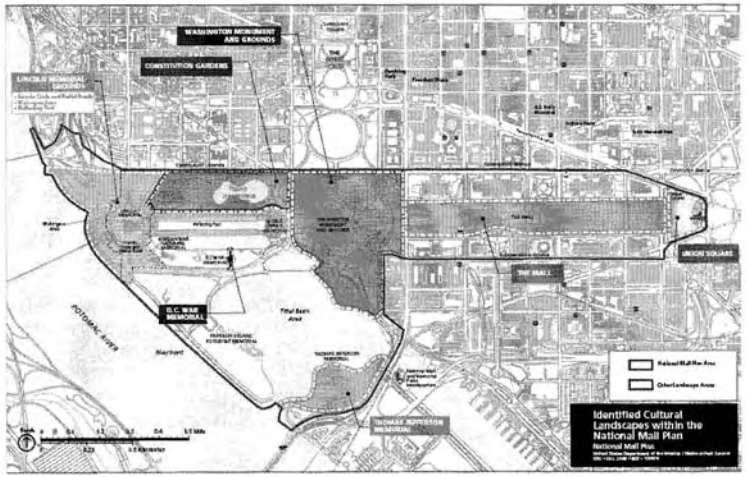


FIGURE 7: Identified Cultural Landscapes within the National Mall Plan

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

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.

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.

Commission staff has participated in NPS meetingw 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.

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.

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

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

be required. This Table is also a useful summary of the projects that may result from implementation of the National Mall Plan.

TABLE 41: ACTIONS REQUIRING ADDITIONAL COMPLIANCE UNDER THE NATIONAL HISTORIC PRESERVATION ACT, SECTION 106

Highlighted areas require additional compliance.

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	No
Constitution Gardens	
Relocate Lockkeeper's House	Yes
Construct multipurpose area or food service facility	Yes

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 Panning Commission, Staff Recommendation (cont.)	Response

Consultation and Coordination with other agencies

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.

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.

U.S. Commission of Fine Arts

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.

Comment	Letter 6.2. National Capital Planning Commission	Response

National Capital Planning Commission
401 9th Street, NW North Lobby, Suite 500 Washington, DC 20004 Tel 202.482.7200 Fax 202.482.7272 www.ncpc.gov

In Reply Refer To:
NCPC File No. 7060

March 18, 2010

Ms. Susan Spain
Project Executive, National Mall Plan
National Mall and Memorial Parks
National Park Service
900 Ohio Drive, SW
Washington, DC 20024-2000

Re: Comments on Draft Environmental Impact Statement, National Mall Plan

Dear Ms. Spain:

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.

The following observations and recommendations are additional, staff comments on the draft Environmental Impact Statement (draft EIS).

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.

A 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.

B **C** 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

A. Maps have been revised as explained in response 6.1A.

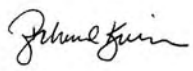
B. Changes have been made to the Monumental Core Framework Plan Opportunities map.

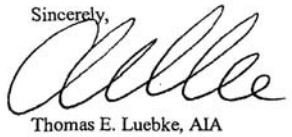
C. Additional secondary vistas have been added to the Urban Design Framework map.

Comment	Letter 6.2. National Capital Planning Commission (cont.)	Response
	Page 2 – Ms. Spain	
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.	D. Secondary vistas have been added to the Urban Design Framework map.
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.	E. The Permitted Recreation map (DEIS, p. 331) has been revised to show additional opportunities, and the title has been changed to Recreational Opportunities.
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.	F. Your suggestion will be taken under consideration since it may be helpful in the future.
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.	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.
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.	H. We agree; see response 1.A.
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@ncpc.gov. Sincerely, David W. Levy, RA, AICP Director, Urban Design and Plan Review	I. The design principles have been updated and added to the *Final Environmental Impact Statement* as appendix F.

Comment	Letter 7. Smithsonian Institution	Response
	Smithsonian Institution **Dr. Richard Kurin** **Under Secretary for History, Art, and Culture**	
	DRAFT NATIONAL MALL PLAN & ENVIRONMENTAL IMPACT STATEMENT **COMMENT BY THE SMITHSONIAN INSTITUTION**	
	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. 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.	
A	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.	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.
B	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	B. Additional data about events have been added to the *Final Environmental Impact Statement.* 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. 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 *Management Program for the Perpetuation of the American Elm Tree in the National Capital* (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.

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Comment	Letter 7. Smithsonian Institution	Response
	March 18, 2010 Page 2	
	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.	
C	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.	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.
D	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.	D. Please see response B to your letter.
	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.	
	On behalf of the Smithsonian Institution	
		
	Richard Kurin Under Secretary for History, Art, and Culture	

Comment	Letter 8. U.S. Commission of Fine Arts	Response
A B C D E F	U.S. COMMISSION OF FINE ARTS ESTABLISHED BY CONGRESS 17 MAY 1910 401 F STREET NW SUITE 312 WASHINGTON DC 20001-2728 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

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

March 15, 2010

Ms. Susan Spain, Project Executive
The National Mall Plan
National Mall & Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024

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)

Dear Ms. Spain:

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.

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.

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.

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Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
A	2 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 tress 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-ff 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) *Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.* *Customer Service Hotline: 1-800-438-2474*	A. Specific concerns are addressed below.

Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
	Technical Comments ***Water Resources*** 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.)	
B		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.
	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 rational for selecting fill as the NPS option and discuss other alternatives that may have been analyzed.	
C		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.
	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.	
D		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.
E		E. The National Park Service will consult with the U.S. Army Corps of Engineers as designs progress.
	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.	
F		F. The Lincoln Reflecting Pool and the Thomas Jefferson Memorial plaza seawall projects were in early stages when the *Draft Environmental Impact Statement* 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.
	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. ♻ ***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
G	***Fish and Wildlife*** 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 n 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?	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.
H	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.	H. During preparation of the *Draft Environmental Impact Statement*, 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. 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.
I	***Soils/Vegetation*** 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: 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.	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.
J	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.	J. Two studies that were not included in the *Draft Environmental Impact Statement* 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 *Management Program for the Perpetuation of the American Elm Tree in the National Capital* (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.
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Comment	Letter 9. U. S. Environmental Protection Agency, Region III (cont.)	Response
K	***Pollution Prevention*** 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.	K. We believe these ideas are captured within recommendations of the Sustainable Sites Initiative™.
L	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.	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	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.	M. We agree that low-flow toilets are appropriate and are consistent with sustainable practices.
N	***Energy Efficiency*** 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.	N. Executive Order 13423 is discussed on page 39 of the *Draft Environmental Impact Statement*, 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	***Waste Management and Recycling*** 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.	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	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. Park managers have been working with the city, the Smithsonian Institution, and others on recycling, including appropriate education and messaging.
Q	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.	Q. Thank you. The correction has been made.
R	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: The Department of Public Works: William B. Easley, Jr. Recyeling Program Officer Office of Recycling 3220 Pennsylvania Avenue, S.E. ♻ *Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.* *Customer Service Hotline: 1-800-438-2474*	R. Park staff have been working with some of the listed contacts and have attended numerous programs to coordinate recycling efforts.

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.
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The Metropolitan Washington Council of Governments:

John M. Snarr, Principal Environmental Planner
Metropolitan Washington Council of Governments
Department of Environmental Programs
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202-962-3359
202-962-3203 (fax)

Email: jsnarr@mwcog.org
http://www.mwcog.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.

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

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

Environmental Impact Statement (EIS) Rating System Criteria

RATING THE ENVIRONMENTAL IMPACT OF THE ACTION

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.

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.

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:

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.

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:

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.

RATING THE ADEQUACY OF THE ENVIRONMENTAL IMPACT STATEMENT (EIS)

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.

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.

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.

ENERGY EFFICIENCY

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:

- 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.

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:

Distributed Generation

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.

Metering

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.

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

Auditing

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.

Energy Star® Tools

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.

Energy Purchasing

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.

Water Efficient Products

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.

Procurment

Each agency shall give preference in their procurement and acquisition programs to the purchase of:

- 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 (EPAct).
- 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.

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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.

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

- **Optimize Energy Use**
  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.

- **Protect and Conserve Water**
  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.

- **Use Environmentally Preferable Products**
  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.

- **Enhance Indoor Environmental Quality (IEQ)**
  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.

- **Optimize Operational and Maintenance Practices**
  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.

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

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Comment	Letter 10. U.S. General Services Administration	Response
	Suzanne Hill (suzanne.hill@gsa.gov) U.S. General Services Administration	[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 *Draft National Mall Plan*?").]
	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.	
	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.	
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.	A. The text refers to the future flood control solution. The text has been clarified.
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.	B. We appreciate your cooperation.
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.	C. The text on page 364 of the *Draft Environmental Impact Statement* referring to the Ellipse steamline has been deleted since this project has been completed..
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.	D. The text on page 364 in the *Draft Environmental Impact Statement* has been corrected based on your comments and the letter from your agency dated February 25, 2010.
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.	E. The text has been updated as you suggest.
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.	F. The map has been updated.
	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.	

Comment	Letter 11. Washington Metropolitan Area Transit Authority	Response
	Ms. Susan Spain Project Executive National Park Service National Mall and Memorial Parks 900 Ohio Drive, SW Washington, DC 20024 Dear Ms. Spain: 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. 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:	[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 *Draft National Mall Plan*?").]
A	**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.	A. Text in the *Draft Environmental Impact Statement* 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.
B	**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.	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.
C		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.

Comment	Letter 11. Washington Metropolitan Area Transit Authority (cont.)	Response
	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 *Environmental Assessment and Visitor Transportation Study* 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 *Visitor Transportation Study* 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 *Visitor Transportation Study* routes: the Memorials Visitor and the Memorials/Downtown Transportation Routes, which will serve the National Mall area in the near future. 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. Sincerely, Tom Harrington Director, Office of Long Range Planning Department of Planning and Joint Development Attachment cc: Jim Hamre, WMATA, BPLN Alexa Viets, National Park Service Aaron Overman, DDOT, Mass Transit Administration	

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CONSULTING PARTIES

Comment	Letter 12. American Society of Landscape Architects	Response
	ASLA Statement of Nancy C. Somerville, Hon. ASLA, Hon. AIA Representing the American Society of Landscape Architects On The Draft National Mall Plan Before the National Capital Planning Commission March 4, 2010 AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS 636 EYE STREET, NW WASHINGTON, DC 20001-3736 www.asla.org 1.888.999.ASLA T 202.898.2444 F 202.898.1185	[EDITOR'S NOTE: On March 4, 2010, Nancy C. Somerville provided testimony to the National Capital Planning Commission on the *Draft National Mall Plan / Environmental Impact Statement* on behalf of the American Society of Landscape Architects.]

Comment	Letter 12. American Society of Landscape Architects (cont.)	Response
	Chairman Bryant and Members of the National Capital Planning Commission, thank you for this opportunity to comment on the National Park Service's Draft National Mall Plan. My name is Nancy Somerville. I am the Executive Vice President and Chief Executive Officer of the American Society of Landscape Architects (ASLA), and I speak on behalf of ASLA. The American Society of Landscape Architects strongly supports the overarching goals and objectives of the National Park Service's Preferred Alternative in the National Mall Plan. Without adequate funding for maintenance, and with no major renovation for more than 30 years, the National Mall has fallen into a critical state of disrepair —in spite of the best efforts and committed stewardship of the National Park Service. As an international symbol and the nation's front yard, the Mall is currently an embarrassment. It merits immediate and serious attention, all necessary funding, and the involvement of the best designers, planners, and technical experts. In March of last year, ASLA convened a Blue Ribbon Panel of design professionals representing landscape architecture, architecture, and planning to review the National Park Service's Preliminary Preferred Alternative. The panel's report, published last April, was shared with NCPC, the Commission of Fine Arts, and the National Park Service. My statement today incorporates many of the panel's recommendations. First of all, to restore the National Mall as a place of pride, adequate funding and an overall vision are critical. The focus of the National Mall Plan is, understandably, primarily on maintenance, and design of the important elements and spaces on and around the Mall is still to come. Going forward, however, repairs and improvements must not be piecemeal, but must proceed as part of an overall vision and comprehensive design. In addition, there must be close coordination and cooperation among all of the institutional stakeholders. Not all of the needs of the National Mall can be met within the narrow precincts of the area consigned to the stewardship of the Park Service, and planning for the National Mall and the federal precincts cannot be done in isolation. Along those lines, we applaud the work done by NCPC and the Park Service to coordinate the Framework Plan and the National Mall Plan. As planning proceeds, we urge even closer coordination between your two agencies, as well as the Smithsonian, the Architect of the Capitol, and the D.C. government. NCPC's Framework Plan appropriately recognizes that residents' and visitors' experience of the city is not defined by jurisdictional boundaries. So, too, planning for the National Mall must not be constrained by artificial boundaries. The proposed redesign of Union Square is a case in point. We support many of the concepts underlying the plan's recommendations for this critical area, which is not only a bridge between the Capitol grounds and the Mall, but also lies at the intersection of major connections to the city. ASLA believes strongly that the importance of this site merits an international urban design competition. Such a competition should encompasses the entire area, incorporating not just the square but stretching from Constitution Avenue to Independence Avenue to fully integrate the square with the Capitol grounds and provide natural connectivity to the U.S. Botanic Gardens. There are many aspects of the National Park Service Plan and the Preferred Alternative that deserve special praise. Chief among them is the commitment to sustainability, including the application of standards defined by the Sustainable Sites Initiative. ASLA is one of the founding Page 2 of 4	
A		A. The proposed plan constitutes a comprehensive vision for the National Mall. The purpose of a vision plan is to provide a coordinated and comprehensive written program for future action to protect America's national parks, and they are prepared with public involvement and environmental analysis in accordance with the National Environmental Policy Act. The proposed plan provides a cohesive framework for future management by addressing physical development needs as well as resource protection, the civic forum, circulation, visitor enjoyment, and park operations.
B		B. We agree, as does the Architect of the Capitol (see comment 2.2B).

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	partners of the Sustainable Sites Initiative™ (SITES™), which is the first national rating system for sustainable landscapes. Through the use of sustainable practices for this iconic landscape, the National Mall can become a model of sustainable design for millions of visitors each year. The importance of environmental stewardship—and of valuing the natural resources that make up the Mall—cannot be overstated. As we are all aware, Washington faces serious environmental issues. Urban stormwater runoff contributes to the pollution of the surrounding watershed and to flooding. The trees and other natural vegetation that clean the air and mitigate the urban heat island effect are themselves suffering from the degraded air. Although the city contains a wealth of parks and green spaces, many, like the National Mall, have unhealthy, compacted soils that inhibit root growth and cannot absorb stormwater. ASLA applauds the Park Service's plans for protecting the Elm Panels and for assembling a team of expert consultants to develop a plan to address the soil and turf issues. Other elements of the National Mall Plan that deserve particular praise include the following:	
C	▪ Removal of the Sylvan Theater and temporary visitor services tent, and reuse of the site for centralized visitor services. As part of this effort, the landscape plan that was part of the Olin Partnership design for the Washington Monument grounds should be fully funded and completed.	C. We agree, and an action has been added that calls for updating and implementing the 2003 Olin landscape plan.
	▪ Reconstruction of the Tidal Basin seawall, already underway, and widening of the walkways.	
	▪ Integration of bike trails around the Tidal Basin and throughout the Mall.	
	▪ Elevation of Constitution Gardens to, in the words of the Park Service, "a rejuvenated garden and destination for relaxation and enjoyment."	
	▪ Renovation of water features, including ending the use of potable water.	
	We also note several areas of concern.	
D	▪ Development of individual interpretive centers for memorials. ASLA fully endorses Congress's declaration of no new construction on the National Mall beyond what has already been approved. In keeping with that goal, ASLA opposes the creation of individual interpretive centers for memorials. While well intended, these interpretive centers fragment the Mall and diminish the way the memorials and monuments were intended to be experienced. Instead, we support the concept of a central visitors' center—possibly housed in the Arts and Industries Building or in the Smithsonian's Castle building, which already serves as a central visitors' center for the Smithsonian's 17 museums.	D. None of the alternatives in the *Draft Environmental Impact Statement* proposes interpretive centers for individual memorials. Most memorials have small staffed information areas, but these are different from what is normally included in a visitor center, such as exhibits, audio-visual programs, and theater space. As described on page 130, the National Park Service does not believe that the National Mall needs a central visitor center, but we do believe that a welcome plaza, better pedestrian guide signs, and readily available information at all facilities (including electronically available information) would improve the visitor experience.
E	▪ Excessive and intrusive signage. Signage plans need additional careful review, with consideration given to 21st century along with 20th century solutions.	E. Coordinated graphic information within major tourist/natural or cultural destinations (or campuses) is a necessity to aid in wayfinding, avoid congestion, and provide needed information. Signs should be kept to the minimum. Text should be limited, and pictograms and symbols should be used when possible. These are best practices identified by tourist organizations, highly visited destinations, and campus designers. A pedestrian wayfinding sign project is underway (see DEIS, p. 361). The coordinated sign plan has been reviewed and approved by the U.S. Commission of Fine Arts and the National Capital Planning Commission, and first phases are scheduled to be installed in the summer of 2010.
F	▪ Pathways and paving. While the paving system for the entire National Mall area needs a redesign, we are concerned about selecting a "one-size-fits-all" uniform solution for the 26 miles of pedestrian paths within the area. In particular, additional thought should be given to Page 3 of 4	F. It was not the intent to use a single paving material in all areas of the National Mall, and the text has been revised to clarify this (DEIS, pp. 166, 178, 206). The text has been changed to refer to a coordinated palette of paving materials that would be suitable for various uses.

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G	retaining the historic gravel on the Mall itself, a feature that is an integral part of its current design in keeping with other major parks around the world, is permeable, is low-heat and has low reflectivity, and which encourages more relaxed strolling. Although the gravel pathways create maintenance challenges, there are major parks around the world that have been able to maintain some form of soft walkway successfully in conjunction with the hard surfaces that are better able to accommodate wheelchairs, strollers, maintenance vehicles, etc. In addition, we do not support the concept of paving over the 12th Street corridor. In closing, there is much more to celebrate than to criticize in the National Mall Plan. The National Park Service should be commended for it thoroughness, its diligence, and its commitment to stewardship. A renewed and healthy National Mall, a redesigned Union Square that takes full advantage of its pivotal location, and the other projects that will come out of the vision of the National Mall Plan, have the opportunity to add to the extraordinary legacy of planning and design that shaped our nation's capital. It is incumbent on all of us to ensure that the potential of this plan is fully realized. Thank you for the opportunity to comment and to contribute to the future of the National Mall. ASLA stands ready to provide support and assistance to further develop the vision. Page 4 of 4	G. The National Park Service is highly interested in sustainable approaches to paving materials. There are many ways to approach sustainability. For example, at the National Mall paving can be sustainably used to maximize rainwater capture for reuse in irrigation. The current gravel walkways are neither permeable nor easy to maintain, given the high level of use and the vehicle weights that must be supported. Also, many gravel walkways are not accessible, and snow cannot be easily removed. Also see response 8D to the U.S. Commission of Fine Arts and the discussion of gravel walkways under "Summary of Comments and Responses" (beginning on page 12).

Comment	Letter 13. The Committee of 100 on the Federal City	Response

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March 17, 2010

Susan Spain, Project Executive
The National Mall Plan
National Mall & Memorial Parks
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Dear Ms. Spain:

Re: Comments of the Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Impact Statement (December 2009)

The Committee of 100 on the Federal City is pleased to comment on the *Draft National Mall Plan/Environmental Impact Statement* that the National Park Service released in December 2009 for a 90-day public comment period ending March 18, 2010.

The Committee of 100 on the Federal City has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning work of the McMillan Commission (1901-02). The future of the National Mall is a major interest of the Committee. The National Mall Plan that has been outlined in draft form will be a key element for the future development of the Monumental Core of Washington, D.C., our nation's capital and the hometown of Washingtonians.

The Committee of 100 on the Federal City has been participating in the current public process of preparing the National Mall Plan for the past several years. We submitted initial comments (dated May 19, 2008) on the *Draft Alternatives Matrix-The National Mall* (April 2008) and last year submitted comments (dated May 15, 2009) on the *National Mall Plan-Preliminary Preferred Alternative* (March 2009). The Committee of 100 is one of the consulting parties in the Section 106 process related to the National Mall Plan. For simplicity, we refer to the Committee of 100 on the Federal City as the "Committee of 100" or simply as the "Committee" in these comments.

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I, John Fondersmith, and other members of the Committee of 100 have attended and participated in a number of meetings called by the National Mall and Memorial Parks staff over the past two years. We have also attended various meetings of the National Capital Planning Commission (NCPC) and the Commission of Fine Arts, and benefited from the discussion and the staff reports at those meetings. You and John Piltzecker, Superintendent, National Mall and Memorial Parks, attended the meeting of the Committee of 100 on the Federal City on January 20, 2010 and presented the *Draft National Mall Plan.* We appreciated and benefited from hearing that presentation from you.

In addition, I and other members of the Committee of 100 have participated in reviews of other ongoing projects on the National Mall over the past two years, including the Potomac Park Levee Project, the Rehabilitation of the Lincoln Memorial Reflecting Pool and Surrounding Area, the Rehabilitation and Restoration of the D.C. War Memorial, the Repair of the Thomas Jefferson Memorial Plaza and Seawalls, and the Thomas Jefferson Security Perimeter. Some of these reviews are still ongoing. While technically these are separate projects, they relate to and have informed our views on the National Mall Plan.

We want to express our appreciation to you, Superintendent John Piltzecker, other members of the National Park Service staff, and the consultants that have been involved with preparing the *Draft National Mall Plan/Environmental Impact Statement*. This has been a major and complex undertaking involving a key area in the center of the Monumental Core of Washington.

The comments of the Committee are presented below in four parts. **Part 1** outlines key overview points and big ideas. **Part 2** generally follows the format of Mall wide and specific areas used at various places in the report, including Table 7 (pages 150-243). **Part 3** indicates clarifications we recommend be included in the report to increase understanding. **Part 4** outlines the Committee's concerns with and recommendations for the next steps in preparing the National Mall Plan, including steps beyond what the National Park Service plans to do.

PART 1: OVERVIEW AND BIG IDEAS

The Opportunity

The work of the McMillan Commission (1901-02) provided a framework for the development of the National Mall in the 20th century. That framework evolved over the 20th century and was last updated by the planning work of Skidmore Ownings and Merrill for the National Park Service in 1966 and 1973. The National Park Service has previously indicated that the National Mall Plan would be a fifty-year plan, so in theory this plan will extend to 2060. It will therefore set the framework for the National Mall in the remainder of the 21st century, and should be visionary and comprehensive. The Committee realizes that any plan for the National Mall will evolve over a period of 50-90 years. However, that evolution should be guided by a comprehensive framework established now.

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The current planning program by the National Park Service comes at a time of increased public attention to the National Mall, in part because of well-publicized stories about the poor condition of the National Mall and because of publicity about various new projects. Photographs of an estimated 1.8 million people on the National Mall and adjacent areas for President Obama's inauguration on January 20, 2009 bought additional attention. In his inaugural address, President Obama referred to the landscape stretching before him as "this magnificent Mall". Recently, in announcing the use of stimulus funds for projects on the National Mall, Secretary of the Interior Ken Salazar said, "this is the Mall that belongs to the people of the United States of America".

The National Mall will clearly continue to be in the public eye over the next five to ten years. In addition to numerous projects that the National Park Service will undertake on the National Mall, the Martin Luther King, Jr. National Memorial will be completed and the National Museum of African American History and Culture, and the Vietnam Veterans Memorial Education Center probably will be completed in that period. A number of important projects adjacent to the National Mall are expected to be completed or underway during that period. On the north side of the National Mall (at the northwest corner of Constitution Avenue and 23rd Street, NW), the United States Institute of Peace Building is under construction and will open in early 2011. Just south of the National Mall, both the Dwight D. Eisenhower Memorial and the Veterans Disabled for Life Memorial are in the design stage and both these new memorials will likely be completed in the next five to 10 years. A site for a National Women's History Museum is proposed adjacent to the National Mall (Independence Avenue and 12th Street, SW).

The Long-Range Challenge

The long-range challenge is to outline a plan for the National Mall that allows for future changes (that cannot be specifically anticipated) without imposing rigid constraints that deaden the Mall's spirit nor destroy its capacity to inspire and surprise. The image and experience of the National Mall embraces several different elements. The overall landscape of formal and natural grounds provides the setting. A second element is the memorials and monuments, especially the three iconic memorials to George Washington, Thomas Jefferson and Abraham Lincoln. Views of these memorials, and views of the United States Capitol and the White House, are parts of the National Mall experience. The museums, galleries and sculpture gardens of the Smithsonian Institution and the National Gallery of Art are also key parts of the National Mall experience. The monuments, memorials, museums and galleries are major Mall destinations--what people come to see.

At the east end of the National Mall are lands under the jurisdiction of the Congress (Architect of the Capitol), including the U.S. Botanic Garden and the National Garden. Buildings bordering the National Mall provide a frame and some, such as the National Archives, are part of the Mall experience.

Finally, multitudes of varying outdoor events are an important part of the National Mall experience. These include demonstrations, the Smithsonian Folk Festival, Kite Day, the Boy

Scout Jamboree, the African American Family Reunion and numerous other events. Especially for Washingtonians, the National Mall is a wonderful space that may be crossed on foot or in vehicles several times a day, and in different seasons. The challenge for the National Mall is to be able to accommodate a range of activities by different groups and individuals, with multiple activities taking place at the same time. One of the challenges to Mall planners is to shift some of these activities to areas adjacent to the Mall without injuring or threatening the reality and perception of the Mall as accessible public space.

Planning Area and Approach for the National Mall

A

In preparing the National Mall Plan, the National Park Service has outlined a planning area that essentially encompasses all of what is defined as the National Mall, but has only done detailed planning for National Park Service lands. This Park Service area has a number of limitations. While the Committee understands that there is background coordination between the National Park Service and other government agencies, this coordination is not always apparent from the material that has been provided to the public. Several organizations have suggested that the National Mall be expanded to include at least part of the White House and President's Park area, now a separate area also administered by and planned by the National Park Service. It would seem appropriate for the Ellipse to be included in the definition of the National Mall. At the least, this area should be shown on the National Mall planning maps and documents, and the plans for that area summarized. However, the information on the *Comprehensive Design Plan for the White House and President's Park* (page 47) is very summary in nature.

B

The problem of seemingly uncoordinated planning for the area of the National Mall between Third Street and Fifteenth Street and Constitution and Independence Avenues is even more striking. Here the central open space of the National Mall is lined on both sides by the museums, art galleries and sculpture gardens of the Smithsonian Institution and the National Gallery Art. These facilities are an integral part of the National Mall landscape and visitor experience. It appears that these lands offer opportunities for joint use of facilities in some cases. The future use of the now closed Arts and Industries Building of the Smithsonian Institution will be a key decision. The National Gallery of Art is looking for expansion space adjacent to its present sites. Yet the future development and use of these museum and gallery sites is not fully reflected in the *National Mall Plan*. The Whitten Building of the U.S. Department of Agriculture is also part of the area of the National Mall between 12th and 14th Streets, SW. This building plays a relatively minor role in the visitor experience at present but has been mentioned as a possible museum site in the future.

C

Finally, at the east end of the National Mall between First and Third Streets, Union Square is included in the proposed National Mall Plan. However, the adjacent areas to the north and the south under the jurisdiction of the Architect of the Capitol are not included. This is a key area of the National Mall and a comprehensive vision should be presented. However, the Capitol Complex Plan is still undergoing internal review.

A. 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 for the areas covered in the McMillan plan.

The proposed plan is a vision plan for the National Mall, which includes all areas except those occupied by the Smithsonian Institution, the National Gallery of Art, and the U.S. Department of Agriculture. Nevertheless, the plan presents a vision for the entire area and is compatible with other vision plans for this area, including the NCPC *Extending the Legacy* (1997) for Washington, D.C., the *Center City Action Agenda* (District of Columbia 2008), the NCPC *Memorials and Museums Master Plan* (2001), and the NCPC *Monumental Core Framework Plan* (2009). The NCPC *Legacy* plan is the successor to earlier plans, such as the L'Enfant and McMillan plans (see DEIS, p. 42), and other plans are all compatible with the *Legacy* plan. The National Park Service considers the National Mall plan to be one of the implementing plans for the *Legacy* plan.

B. Most facilities are not expected to change. Several of these facilities were addressed in the *Monumental Core Framework Plan*. The National Park Service worked with the National Gallery of Art on the listing of projects shown on the Recent, Ongoing, and Future Cumulative Projects map (DEIS, p. 359).

C. The National Park Service and the Architect of the Capitol agree that a comprehensive vision for Union Square is needed, and that a design competition is a compelling idea. Please see letter 2.2.

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	This type of fragmented planning for the National Mall is not acceptable when, in theory, the framework is being outlined for the next 50 years or more. The American people deserve an overall comprehensive planning approach for the future of the National Mall.	
D	The Committee of 100 has urged the National Park Service to prepare such a comprehensive plan for the National Mall, by working with the other government agencies and institutions that have a role in the development of the area. These include the National Capital Planning Commission, the U.S. Commission of Fine Arts, the Architect of the Capitol, the District of Columbia government, the Smithsonian Institution, the National Gallery of Art, the U.S. Department of Agriculture, the Washington Metropolitan Area Transit Authority (WMATA), etc. The Committee understands that much background coordination has been undertaken behind the scenes, but the results are still not fully apparent in the *Draft National Mall Plan.*	D. See response A to your letter. As stated on pages 544–46 of the *Draft Environmental Impact Statement,* cooperating agencies participated in several multiday workshops to help develop planning principles, preliminary alternatives, and the preferred alternative, in addition to providing extensive comments during internal reviews of the draft document before its publication. Most cooperating agencies chose not to participate in consulting party meetings under section 106 of the National Historic Preservation Act. While consulting parties may represent specific constituents, meetings with cooperating agencies and those with consulting parties for section 106 consultations were kept separate to avoid a perception that some groups might have more influence than general citizens.
	Integrating the National Mall with Surrounding Areas	
E	The Committee of 100 is especially concerned that planning for the future development and use of the National Mall be closely integrated with adjacent areas of Central Washington, including other areas under the jurisdiction of the National Park Service but with different boundaries. One of the most important features of the National Mall in the 21st century will be its increased centrality with other areas of Central Washington, a condition stressed in the *Center City Action Agenda* prepared by the D.C. Office of Planning and others (released in early 2008). This will be increasingly important as new development occurs south of the National Mall, especially on the Southwest Waterfront and to the southeast along the Anacostia River. Transportation and symbolic links with these areas will be important to how the National Mall operates.	E. We share your concern that planning and development be integrated and that transportation and symbolic links be incorporated in planning efforts. This is why the National Park Service, the National Capital Planning Commission, the Architect of the Capitol, the U.S. Commission of Fine Arts, and the District of Columbia worked together on the brochure *Planning Together for Central Washington*, which explains common priorities and objectives.
	Fortunately, the National Capital Planning Commission and the U.S. Commission of Fine Arts completed a three-year planning program last year for four key areas adjacent to the National Mall. Both agencies approved the *Monumental Core Framework Plan: Connecting New Destinations with the National Mall* last spring. Future studies will be undertaken (some are underway) to test and refine key proposals and move forward with implementation. The final National Mall Plan should more fully reference and relate to this plan, with special emphasis on those proposed developments that border or are within one or two blocks of the National Mall on the north and south. The relationships and connections with areas east of the Tidal Basin, including East Potomac Park, are also especially important.	
	The original planning program for the National Mall also included the Pennsylvania Avenue Historic Park, a corridor extending from the Capitol to the White House area. This is an important area, long seen as the "bridge" between the National Mall and Downtown Washington. Planning for the Pennsylvania Avenue Historic Park has been dropped from the present National Mall planning program, but will be addressed at a future time.	
	Integrating the National Mall with adjacent areas involves a number of factors, including various aspects of transportation, signage, general visitor information, enhancing visual connections	

(vistas), and locating key land uses (retail, restaurants, hotel, entertainment, cultural, residential, as well as office) near the National Mall to the north and south, linked by convenient walking paths and various forms of transportation.

Integration with District of Columbia Objectives

The District of Columbia government and the citizens of Washington, D.C. have a major stake in the future development and use of the National Mall. This involves both the potential personal use of the National Mall by local residents as well as the major impact on the economy of the city. Although there are many other attractions in Washington, many visitors come to visit the National Mall and adjacent areas. As noted above, as major development expands south and southeast of the National Mall, it becomes even more central to the life of the city.

The District Government has a relatively limited direct role in the operation of the National Mall area, primarily related to maintaining streets that cross the Mall and providing certain services. However, many of the visitor services that necessarily support and benefit from the National Mall are now and will be located in adjacent areas (restaurants, shops, hotels, tour bus parking, etc.). It is essential that National Mall planning consider the District's role, and that the District government, civic organizations and the private sector continue be involved in the process.

F

F. We agree, and the National Park Service has worked closely with the city to incorporate their plans and goals.

Need for Additional Information

There is still background information that has not been fully provided to the public, or that needs more attention in the future. The following are some key issues and needs.

Future Visitation Numbers: Planning for the future of the National Mall, especially in terms of transportation and service facilities, requires some understanding of the numbers and timing of visitors. Over the next 40 years, the population of the United States is projected to increase from an estimated 306 million at present (2009) to an estimated 439 million in 2050. This is almost certain to increase attendance on the National Mall. It seems likely that visitation from foreign countries will also increase. Locally, the combination of an increasing population in Washington, D.C. and the Washington region will also increase visitation. It seems certain that the number of future visitors to the National Mall will considerably increase and they will use the National Mall more at night (especially if adequate transportation and security is provided and if museum hours are extended). Information on visitor projections is included on Pages 319-322 of the *Draft National Mall Plan.* It appears that additional coordination of visitor counts between the National Park Service, the museums and other attractions may be useful.

G

G. The visitation projections shown in the *Draft Environmental Impact Statement* (pp. 321–22) take into account three different projections of future visitation based on historic trendlines. Future visits are projected to increase by 25 million to 43 million visits annually over the next 20 years. These projections are adequate for this level of vision planning. The National Park Service and others will continue to examine visitation numbers and projections, as well as gather information about visitors. The Park Service is continually refining its data gathering techniques because of the unique open nature of the National Mall, which makes it nearly impossible to count every visitor or participant in permitted activities.

Impact of Global Warming: The issue of potential future flooding of some National Mall areas has been raised by a number of groups. This problem could become more serious if sea level changes related to global warming become more pronounced over the next 50-90 years and affect the water levels of the tidewater Potomac River (and the Anacostia River). If this is to be a problem, it could have major impacts on the long-range plan for the National Mall. Despite

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H	requests, the National Park Service has not provided much information on this issue. The statement on the effects of climate change (page 158) is limited. This issue should be better addressed in the final plan.	H. A more extensive discussion may be found on pages 39–40 of the *Draft Environmental Impact Statement*. Please also see the discussion of climate change under "Summary of Comments and Responses" (page 16).
	Big Ideas Although all elements of the National Mall Plan are important, the Committee believes that it is important to place special emphasis on certain big ideas, as noted below.	
	Restoring the National Mall: The overall quality of the National Mall experience has greatly deteriorated over the past several decades due to deferred maintenance, now estimated to be over $400 million. This issue is to be addressed through increased federal funding (including stimulus funds at the present time) and new private sector and foundation contributions through fund raising by the Trust for the National Mall and other organizations. Catching up with past neglect will take many years. However, in time these improvements can bring the National Mall to the quality that it should have. The Committee of 100 commends the National Park Service for this overall effort to make up for past neglect and for stressing sustainable design and development in repairing and restructuring the National Mall.	
I	Union Square: The major new initiative in the *Draft National Mall Plan* is the total redesign of Union Square and adjacent areas between 1st and 3rd Streets. The major proposed change is the replacement of the large reflecting pool, a product of the 1970s, with a new civic square west of the Grant Memorial. This new civic square will accommodate many different activities, including demonstrations. The Committee supports this major redesign of Union Square, with some caveats as noted below. However, the Committee strongly opposes any suggestion that demonstrations be restricted only to this area.	I. We agree that the National Mall as an important venue for political speech and that demonstrations should not be restricted into any one area. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."
J	The Grant Memorial is to be restored and the adjacent landscape incorporated into the new design. The Committee of 100 is supportive of this new design approach but also has some concerns. It will be very important to have a coordinated design for the entire area between Constitution and Independence Avenues, including the two triangular areas under the jurisdiction of the Architect of the Capitol, and to eliminate the major parking areas now located along Pennsylvania and Maryland Avenues east of Third Street. The area of the civic square must be large enough to accommodate major events but not so large that it would become almost empty space when not being used. Design must consider the environment of Washington summers and not create a space that is barren and uncomfortable. In the 1960s a large National Square was proposed between 13th and 15th streets at the west end of Pennsylvania Avenue that had the potential to be a barren space. Fortunately, the Pennsylvania Avenue Plan was revised and the open space scaled down. That kind of potential problem must be avoided in the redesign of Union Square.	J. See response C to your letter and letter 2.2.

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K	This space should have the feeling of an American space, reflecting the sense of the adjacent Capitol grounds. Though built to accommodate demonstrations, the space should not be a space that projects a sense of perpetual conflict. In view of experience elsewhere, care is needed not to create a design that encourages skateboarding in this space. A relatively small building north of Union Square, in the scale of the National Botanic Garden to the south, would seem appropriate and could house a variety of visitor services as well as some special uses of its own. Properly designed, this new space and adjacent building could help bring a new festive feeling and sense of activity to this east end of the National Mall. If not well done, a new problem area might be created here. Careful design and programming will be important in creating a new vibrant civic space with national meaning.	K. We agree that Union Square could be a vibrant new civic space with national meaning and a sense of activity. Also see letter 2.2.
L	Tidal Basin Area: The Tidal Basin area, including the Jefferson Memorial and the flowering cherry trees, is already a special place in the city and it will gain new meaning and increased visitation levels once the Martin Luther King, Jr. Memorial is completed in the next several years. The "Preferred Alternative" calls for a variety of improvements, including enhanced walkways and bicycle trails, lighting and interpretation. The Tidal Basin seawalls would be rebuilt above the water levels. The new seawalls would be built in the present Tidal Basin, slightly decreasing the size of the Tidal Basin. The Committee is concerned that long-range opportunities may be missed at the Tidal Basin, especially in terms of connections to the Washington Monument grounds and in connections to the east to the Southwest Waterfront. Alternative B in the Draft National Mall Plan includes a new pedestrian crossing across the Tidal Basin south of Kutz Bridge. Alternative C calls for filling in part of the Tidal Basin to create more land and improve pedestrian connections from the Tidal Basin to the Washington Monument grounds. This would be especially true if a new north-south elevated walkway along the White House-Jefferson Memorial vista axis could be provided to pass over Independence Avenue and extend to the north side of the Tidal Basin. Alternative C for the Tidal Basin is, at present, not being considered. It may be that the best course in the near future is to proceed with the Preferred Alternative design for this area, but not take any actions that would preclude the major redesign suggested in Alternative C. This would provide time for further consideration of the merits of such a major transformation of the north side of the Tidal Basin.	L. We appreciate your interest in taking a bolder step at the Tidal Basin, such as filling the basin's north portion or elevating walkways. While there has not been much consultation about the Tidal Basin under section 106 of the National Historic Preservation Act, there was a negative public response when newsletter 3 was issued, since the Tidal Basin is listed as a contributing feature in the East and West Potomac Parks Historic District, and the alternative C proposal was not carried into the preferred alternative. It is not clear whether you are proposing a bridge or a deck over Independence Avenue to provide access. Decking over Independence, while an attractive concept, would have huge ramifications because the roadway would need to be sunk sufficiently to accommodate double-decker buses and would require special engineering considerations due to a high water table. An enclosed roadway would prevent sightseeing buses and other drivers from enjoying the north-south vistas. A pedestrian bridge was included in alternative B to provide pedestrian access to underground parking south of Independence, and this would achieve the goals you mention. Such a bridge would also present engineering challenges and would be costly. The bridge would need to be high enough to allow double-decker bus traffic on all lanes in both directions. Since Independence Avenue is a divided road, the bridge span would be long. The bridge would need to be accessible for all people, including those with disabilities, so ramps would be very long, potentially up to 300 feet on each side. Also, access to the bridge and ramps would need to be convenient to the primary east-west walking patterns, possibly with two ramps on each side. Therefore, it is highly likely that pedestrian use patterns would not be as direct or convenient as on-grade crossings. The visual impact of a bridge would dominate the avenue, and ramps could intrude into the north-south vista. An alternative to a bridge or a deck would be improved crosswalks, which are considered under the preferred alternative. Waiting areas and walkway widths would be enlarged, and crosswalk timing would be extended for more pedestrian safety and equity with vehicle traffic. This approach would also support city and regional transportation goals (such as encouraging walking as a healthy alternative, reducing congestion, improving quality of life, and reducing pollution). These actions would incorporate good urban design principles and practices, including traffic calming, travel demand management, and transit-oriented development (onsite transit stops, coordination with visitor facilities, and multimodal access). Decking over Independence Avenue and constructing a pedestrian bridge were considered but dismissed for the following reasons. Both options would duplicate lower cost or less environmentally damaging solutions, and they would have too great an environmental impact. It is also unlikely that given the extent of funding needs for the National Mall that either of these projects would be a priority or economically feasible. This discussion has been added to the final document under "Alternatives: Actions Considered but Dismissed."
M	To the east, improved connections between the Tidal Basin/Jefferson Memorial area and the Southwest Waterfront are needed. This might include connections between a future cultural building on the Liberty Loan Building site, and perhaps a pedestrian platform extension of Maryland Avenue to connect with the Tidal Basin area. The *Monumental Core Framework Plan* prepared by NCPC and the Commission of Fine Arts begins to address these issues, but is only a start. The Committee of 100 would like to see additional study of better connecting the Tidal Basin area to the north and the east. This might be a case where some improvements could be made in the relatively short-term, with more significant improvements and connections being made later, perhaps in 10-20 years or more in the future.	M. The NCPC *Monumental Core Framework Plan*, the proposed National Mall plan, and D.C. pedestrian and bicycle plans together have defined a cohesive vision for improved pedestrian and bicycle access and connections for the areas you mention. The City of Alexandria, Virginia, has stressed an interest in improved pedestrian and bicycle connections over Potomac River bridges as well. The Ohio Drive roadwork project, which is underway, is one step in this direction. The 14th Street bridge corridor would also address these issues. As you note, other actions will take a much longer time.

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N	Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 9 Washington Waterfront Walk: The Washington Waterfront Walk (WWW) is the proposed 11-mile connected waterfront walk (pedestrians, bicycles) from the Georgetown Waterfront to the National Arboretum. It is one of the key new elements that came out of the 1997 *Legacy Plan* prepared by the National Capital Planning Commission. The Draft National Mall Plan mentions new bicycle lanes and trails along the West Potomac Park Waterfront but the Washington Waterfront Walk does not receive the attention it deserves. This waterfront walk should have greater emphasis. The Committee believes this is one of the important elements of the new Central Washington that is being created in the first part of the 21st century. It is especially important that adequate connections for the Washington Waterfront Walk be provided from West Potomac Park through the Jefferson Memorial area to the Southwest Waterfront.	N. The Washington Waterfront Walk has been added as one of the connections for pedestrian and bicycle trails (DEIS, p. 240, row 24.3). Currently, the city's Anacostia Initiative stresses a continuous pedestrian walk extending to the National Mall and East Potomac Park.
	Transportation System: Improvements in various elements of the transportation system will be critical for improved use of the National Mall in the future, and for providing convenient connections to adjacent areas of Central Washington and beyond. The Committee is pleased to see that the *Draft National Mall Plan* calls for an improved bus transportation system, connected to the overall transportation system of the city. This will allow more convenient access to and within the National Mall than exists at present for both visitors and residents. The plan proposes to have coordination between the National Park Service and local commercial parking garages, and providing visitor valet or shuttle service between the parking garages and the National Mall (page 450). In addition, improvements are proposed for pedestrian paths and bicycle paths. **Urban Design Initiatives** The Urban Design Framework for the National Mall is discussed in the *National Mall Plan* and shown schematically on the "Urban Design Framework" map on page 45. However, in addition to the major ideas and possibilities mentioned above and elsewhere, there are a number of smaller urban design initiatives that seem to have potential for improving linkages between parts of the city and locations on the National Mall. Several are mentioned below and there are undoubtedly others that could be noted for further study. Several urban design enhancements are noted in the *Monumental Core Framework Plan* that was adopted by the National Capital Planning Commission and the U.S. Commission of Fine Arts last spring. These ideas below need further study to see if they are desirable and feasible. Opening such vistas generally involve some tradeoffs, primarily in altering an existing landscape feature (primarily by removing or trimming trees and shrubs) to add a new enhancement by opening reciprocal vistas to and from sites within the National Mall. The Committee previously requested that the National Park Service consider these concepts in preparing the final National Mall Plan. However, they have not been addressed. We would still like these possibilities to be considered.	
O	Maryland Avenue Vista to Tidal Basin and Beyond: The vista along Maryland Avenue from the Capitol to the southwest extends across the Jefferson Memorial North Plaza and on across the Tidal Basin and intersects the west edge of the Tidal Basin walk south of the FDR Memorial. It appears that a small plaza could be developed at this location to provide a reciprocal view back	O. The vista has been extended on the Urban Design Framework map.

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
P	northeast to the Capitol. On a larger scale, the Maryland Avenue vista extends on across the Potomac River to the memorial stone in the Lyndon Baines Johnson Memorial Grove, a part of Lady Bird Johnson Park (a National Park Service park). The Urban Design Framework map on page 45 does show this vista, but only as far as the Jefferson Memorial North Plaza.	P. This vista has been extended on the Urban Design Framework map.
Q	Nineteenth Street Vista to D.C. World War Memorial: The D.C. War Memorial is located on the axis of 19th Street, NW, the street that leads south from Dupont Circle to Constitution Avenue. The D.C. World War Memorial is to be restored in the near future. The Committee suggests that studies be undertaken to see if a vista could be opened along the line of 19th Street, south from Constitution Avenue to the Memorial, thus visually connecting this little known memorial to the area of the city north of the National Mall (perhaps as far north as Pennsylvania Avenue). We note that the 1902 McMillan Commission Plan included a similar vista between 20th and 21st Streets, NW to connect with a northern extension of the Reflecting Pool (that extension was not built and the vista was not opened). Virginia Avenue Vista East Toward the Washington Monument: Earlier this year, in discussions of the Potomac Park Levee Project, Lindsley Williams suggested that the vista along Virginia Avenue (which terminates at Constitution Avenue) be opened on to the southeast toward the Washington Monument. The Committee recommends that this proposal receive further study. This vista is shown on the "Urban Design Framework" map on page 45, but it is not clear how much the vista would be opened at ground level.	Q. Very little is likely to be opened from a ground level, because like Indiana Avenue, the view is blocked by buildings.
R	North-South Vista from Washington Monument Grounds to Jefferson Memorial: The north-south vista from the White House to the Jefferson Memorial already exists, one of the strong legacies of the McMillan Commission Plan (though today's design of the area is considerably different from the 1901-02 Plan). As noted previously, the Committee has previously suggested that consideration be given to extending a pedestrian structure from the Washington Monument Grounds to the Tidal Basin, with steps descending to the north side of the Tidal Basin. If this concept proves to be feasible it could strengthen the north-south vista and provide a grade-separated pedestrian route passing over Independence Avenue between the Washington Monument grounds and the north side of the Tidal Basin. This could be a longer range improvement.	R. We agree about the importance of strengthening pedestrian awareness of the north-south vista.
S	**The "View to the West"** One of the key issues involving the National Mall is the "view to the west" from the U.S. Capitol and other points along the main east-west axis looking west to the Lincoln Memorial and beyond. The original design for the National Mall envisioned an uncluttered view to the west, symbolizing the future growth of the country. Unfortunately, a number of buildings in Arlington County, Virginia are visible beyond the Lincoln Memorial and mar the view west from the Capitol along the Mall. Past efforts by the National Capital Planning Commission to protect this viewshed were not fully successful.	S. We agree that the view to the west is important and has been degraded.

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response

Protection of the view to the west should be part of the National Mall Plan, though the National Park Service cannot do this. The National Capital Planning Commission should again address this issue. Hopefully, at some future time, it will be possible to remove some of the most offensive buildings (as they wear out) and restore a more appropriate background for the National Mall. No plan for the future of the National Mall should ignore the threat to the historic and special character of this space. At a time when hundreds of millions of dollars will be spent to enhance the National Mall, protection of the "view to the west" should not be neglected.

PART II: PARKWIDE AND AREA COMMENTS

Comments are provided below on "parkwide" (National Mall Actions) and on actions for different areas of the National Mall. These are listed in the order used in the Draft National Mall Plan. In some cases, a feature has been inserted that is not specifically noted in the Draft National Mall Report. In general, the comments relate to the proposal in the Preferred Alternative (Alternative A) except in cases where The Committee of 100 believes a proposal in another alternative merits comment or support.

National Mall Actions

Cultural Resources: The Committee supports the statements in the *National Mall Plan* regarding the preservation of memorials, related statuary and places of commemoration on the National Mall, and the need for some evolution of the historic landscape to reflect significant national events. We also support improving planned views and vistas, including large areas of open space that are defining features of the historic National Mall landscape. As noted in Urban Design Initiatives in Part I, the Committee recommends further study of opening some new vistas.

T

We understand that many trees and other landscape elements will die or need to be replaced over a 50-year or more plan period. The National Park Service should provide general information about how the landscape elements will be preserved and replanted over time.

T. Row 2.2 on page 152 on the *Draft Environmental Impact Statement* states that cultural landscapes are managed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes*. Cultural resource plans set the goals for treating vegetation, so this is addressed by area.

U

Natural Resources: The Committee generally agrees with the statements about improving conditions for tree and turf areas. However, we question prohibiting all events under Mall trees. We believe there may be alternative methods that would allow such areas to be used, as they are in some other parks in this country and in Europe. The location of special small-scale exhibits and demonstrations under some trees is a special feature of the annual Folklife Festival that should be continued if possible.

U. NPS studies and best practices such as the Sustainable Sites Initiative™ do not support your beliefs. High compaction levels do not promote healthy tree growth. Please see the discussion of elm trees under "Summary of Comments and Responses" (page 17).

Demonstrations, Special Events and National Celebrations: The Committee strongly supports unfettered use of the National Mall as a venue for political speech and demonstrations. However, the National Mall is used in so many different ways that some caution should be exercised in not overly promoting non-political events. As noted elsewhere, we believe development of facilities in adjacent areas could allow some non-political events to be moved off the National Mall.

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	Access and Circulation: This involves the design and operation of the transportation system for the National Mall, including connections for different transportation modes to surrounding areas. As noted previously, the Committee is pleased with proposals to allow for an enhanced bus transportation system to connect the National Mall with adjacent areas and tie into the regular bus system. Providing access for tour buses, including parking off the National Mall, is especially important.	
	Visitor Information, Education and Enjoyment: The National Park Service is proceeding ahead on a separate National Mall Wayfinding Program, now going through the approval process. The coordinated system is an improvement over the present system of wayfinding signs, which has evolved over many years. Visitor information is to be provided at various locations throughout the National Mall. An earlier concept called for a central visitor center with information on the history of the National Mall. That concept is now proposed to be dropped in favor of a decentralized approach to visitor information.	
V	The Committee of 100 understands the concept of this decentralized approach but believes a central place where visitors could obtain National Mall history exhibit is also desirable. We continue to believe that the Arts and Industries Building, which is a property of the Smithsonian Institution, is a logical place for such a visitor center. In other words, the building would have a joint use, with most of the space being used for Smithsonian Institution exhibits and uses, and some space being used for a visitor center operated by the National Park Service. Some retail and restaurant uses might also be located there.	V. Wayside exhibits should address the history of the National Mall. See response H to letter 14.2 from the D.C. Preservation League about another proposal for the Arts and Industries Building.
	Passive and active recreational activities are proposed to continue at various locations on the National Mall. The Committee believes that formal and informal recreational activity is an important part of the National Mall.	
W	**Visitor Amenities:** A range of visitor services (restrooms, seating, food service, etc.) is indicated throughout the National Mall, with multipurpose facilities at several locations. The human necessity for such services is evident. The Committee notes the need for such facilities while stressing that they should be designed in such a way as to not intrude on the special landscape quality of the National Mall. The Committee believes there are locations, especially in the 3rd to 14th Street section of the National Mall, where visitor facilities could be developed on property of the Smithsonian Institution (but outside Smithsonian buildings) which could serve visitors to the National Mall.	W. We agree that needed facilities should not intrude on the special quality of the National Mall. As stated in the *Draft Environmental Impact Statement* (pp. 90 and 210), the National Park Service would continue to explore the ability of adjacent museums to provide new access to existing or proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information.
	Health, Public Safety and Security: The Committee agrees that public safety on the National Mall must be ensured. This is especially important because increased visitation, and the increased adjacent development near the National Mall, will likely result in greater use during early morning and evening hours.	
	Park Operations: This category deals with addressing the deteriorated condition of many areas	

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	of the National Mall, and maintaining the landscape and facilities in the future in an environmentally sustainable manner. The Committee strongly supports these actions (see previous comments in the "Big Ideas" section).	
	National Mall Subarea Actions	
	Comments are provided below by subareas of the National Mall, as used in the Draft *National Mall Plan* (see pages 194-243).	
	The Mall (Note that this is one subarea of the overall National Mall)	
	Union Square (1st to 3rd Streets): The proposal for an almost complete redesign of the Union Square area is one of the big ideas of the Draft National Mall Plan (see comments in the "Big Ideas" section of these comments).	
X	**The Mall (3rd to 14 Streets):** A variety of improvements are proposed for this key section of the National Mall. While many of these seem desirable, additional information is needed about proposals to revise the walkway materials and to restrict activities in the tree space. If parking is removed from Madison and Jefferson Drives, additional attention will be needed on parking in adjacent areas with shuttle service to and from the Mall.	X. Parking on Madison and Jefferson drives is not proposed to be removed over the short- to mid-term (10–15 years). Free parking would be changed to metered parking, as proposed in the *Visitor Transportation Study*. A long-term goal is the removal of private vehicle parking to improve traffic flow and better accommodate bicycling, visitor transit, and pedestrians (DEIS, pp. 90 and 204).
Y	The Committee supports adding the words "National Mall" to the name of the Smithsonian Metrorail Station and to providing orientation information adjacent to the station entrance on the Mall. However, we question whether adequate information can be provided near the Metrorail Station without damaging the quality of that space. We believe there is still a need for a more sizeable visitor center in this central area. Space in a renovated Arts and Industries Building would be an appropriate location.	Y. As explained in appendix D of the *Draft Environmental Impact Statement* (pp. 574–75), outdoor welcome and orientation spaces have been found to be very effective in meeting the needs of visitors. As stated on page 44, the Arts and Industries Building is undergoing repair and preservation work, and the Smithsonian Institution has been asked not to make a final decision about the building's use until a site assessment by the National Museum of the American Latino Commission has been completed.
Z	A key feature of this part of the National Mall is that it is lined with the various museums, art galleries and sculpture gardens of the Smithsonian Institution and the National Gallery of Art. The National Mall Plan should be comprehensive and note the interaction between the museum activities and the central landscape under the jurisdiction of the National Park Service.	Z. We believe this has been adequately described.
	As noted above, cooperative provision of visitor services should be explored, such as additional restrooms and food service on Smithsonian museum property (outside the buildings).	
aa	In terms of major development, the future use of the now closed Arts and Industries Building should be addressed in a comprehensive National Mall Plan. A variety of museum and visitor service uses could be located in this building when renovated. However, the Committee does not believe that this is an appropriate building location for the proposed Hispanic Museum.	aa. Please see response Y to your letter. We recognize that facilities in adjacent museums can help meet the needs of visitors. During the planning effort information about public facilities on and adjacent to the National Mall was gathered and is shown in Tables 20 and 21 (see DEIS, pp. 333–36). Also see response W to your letter. The National Park Service will continue to explore the ability of adjacent museums to provide new access to existing facilities.

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	Washington Monument and Grounds	
	The Washington Monument grounds have a central location in the entire National Mall area. The Committee supports the concept for a new visitor facility, offering a range of services, on the Sylvan Theater site. As indicated previously, the Committee recommends future consideration of a grade separated pedestrian structure from the Washington Monument grounds to the north side of the Tidal Basin. This would better connect these two areas along a symbolic spine, providing more convenient and safer pedestrian movement.	
bb	On a smaller scale, interpretive information at ground level (perhaps with special paving) should be installed to mark the location of the historic Jefferson Pier northwest of the Washington Monument.	bb. The pier marker is regularly interpreted in programs given by park rangers on the Washington Monument grounds.
cc	Greater attention should directed to completing an overall landscape plan for the Washington Monument grounds.	cc. Information about updating and implementing the Olin Partnership landscape plan for the Washington Monument grounds has been added under "Purpose of and Need for the Plan: Scope of this Document — Opportunities, Problems, and Challenges" (DEIS, p 29), the preferred alternative (p. 91), and the alternatives matrix (p. 210, row 13.1).
	West Potomac Park (North of Independence Avenue)	
dd	**Constitution Gardens:** In Section 106 meetings the National Park Service staff has indicated that Constitution Gardens is somewhat unknown and underused. The Committee supports the proposal for a high-quality multipurpose visitor facility at the east end of Constitution Gardens near 17th Street. This facility would provide food service, retail and related activities. Careful design to achieve a festive yet dignified setting is necessary. The description of this facility could be improved in the *Final National Mall Plan*. The Committee also supports proposals for improving the lake and increasing its use.	dd. The goal of the plan is to provide sufficient guidance for future design teams without being too prescriptive.
ee	In view of the name of the area (Constitution Gardens) it may be useful to provide additional interpretive information in the area about the Constitution.	ee. We agree.
	The Potomac Park Levee will be constructed near 17th Street and Constitution Avenue, extending both north and south of 17th Street.	
ff	The Committee supports the proposal for interpretive information near the old canal lockhouse, providing information on the evolution of this part of the city. While we understand that the lockhouse was previously moved from its original nearby location, we do not fully understand the rationale for the proposal to move it again. The Draft Plan talks about pedestrian safety but is not specific about why this proposal is necessary.	ff. The reason for possibly moving the Lockkeeper's House again is because it is very close to the southwest corner of the intersection of 17th Street and Constitution Avenue, which makes sightlines for right-hand turning movements onto 17th Street difficult, especially for buses. Also, the related pedestrian waiting area is small, and the visibility of pedestrians is affected by the location of the structure. The condition of the Lockkeeper's House has been studied, and such a move would be feasible. The structure's orientation to the original canal would be kept (DEIS, p. 378), and actions would be coordinated with the Potomac Park levee plan (DEIS, pp. 92 and 216).
gg	**Vietnam Veterans Memorial:** The Committee supports providing for seating and contemplation near the memorial. However, care is needed not to keep adding additional features that would detract from the special character of this memorial.	gg. We agree.
hh	**Lincoln Memorial and Grounds:** The Committee generally supports the proposals for the Lincoln Memorial grounds. Additional information is needed about future use of the "Northwest Area" and future links to the Kennedy Center for the Performing Arts. In comments on the	hh. This was addressed by a coordinated plan. Please see the NCPC *Monumental Core Framework Plan* for more information.

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ii	Monumental Core Framework Plan, the Committee has raised the issue of more public access and use of Old Naval Observatory Hill as a key area adjacent to the National Mall. Additional consideration is needed of access to the north to the U.S. Institute of Peace Building (now under construction and scheduled to open in early 2011).	ii. The preferred alternative talks about improved crosswalks and timing, which would affect the intersection of 23rd Street and Constitution Avenue and would improve access to the U.S. Institute of Peace. Other pedestrian issues are discussed in the *Monumental Core Framework Plan.*
jj	We note that considerable planning and design work is now underway on the Lincoln Memorial grounds around the Reflecting Pool. This should be noted in the *Final National Mall Plan.*	jj. The ongoing project for the Lincoln Memorial Reflecting Pool and grounds is being funded through the American Recovery and Reinvestment Act, and it was discussed as a cumulative project throughout the plan. Status updates have been provided in the final document and as described in this volume under "Summary of Comments and Responses" (page 26).
	Korean War Veterans Memorial: The Committee supports the proposed minor improvements to walks and interpretive materials.	
kk	**D.C. War Memorial:** The Committee is very pleased to see that special attention is finally being given to the District of Columbia War Memorial which honors those District of Columbia residents who served in World War I. The use of stimulus funds for renovation of this memorial is especially welcome. This improvement project is especially timely since our country will soon be observing the centennial of the World War I period. Since there is no "national" World War I Memorial on the National Mall, this local D.C. memorial can symbolize that period. Interpretation could note that hundreds of such memorials were built across the United States after World War I, some more elaborate and some simpler.	kk. Several bills have been introduced in Congress to revise the statutory purpose of the D.C. War Memorial. The National Park Service supports the mandates of the Commemorative Works Act as amended.
ll	New interpretation should also include recognition that residents of the District of Columbia have served their country in all its conflicts since the establishment of the District in 1791, despite being denied the benefits of full citizenship. Use of the memorial (a bandstand design) and adjacent areas for performance use can add additional activity to this area.	ll. Wayside exhibits are periodically updated, and your ideas can be considered in future interpretive efforts.
mm	**Ash Woods:** The Committee generally supports the proposals for the Ash Woods area but notes that an overall plan is needed for this area. After the opening of the nearby Martin Luther King, Jr. Memorial, this area is likely to have a significant increase in visitor traffic. The Committee suggests that consideration be given to a full-service visitor facility (not just restrooms) in this area. The location, shielded from nearby memorials, would permit an appropriate facility. The rebuilt U.S. Park Police stables, designed so that the paddocks would be a visitor attraction, is an interesting proposal.	mm. We agree that Ash Woods use will increase. Your proposal is consistent with normal design processes.
	West Potomac Park (South of Independence Avenue)	
	Tidal Basin Area: See comments under "Big Ideas".	
	Franklin Delano Roosevelt Memorial: The Committee supports the recommendations for the FDR Memorial and related areas.	
nn	**West Potomac Riverfront Park:** The Committee's major concern in this area is the appropriate design of this section of the "Washington Waterfront Walk" (see discussion in the "Big Ideas" section). The Washington Waterfront Walk needs more attention in planning for all appropriate	nn. See response N to your letter.

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	sections of the National Mall, especially the alignment it follows in connecting the West Potomac Park riverfront with the Southwest Waterfront.	
	George Mason Memorial: The Committee supports proposed rehabilitation of the historic fountain. The George Mason Memorial, interesting in itself, is a memorial that gets relatively little attention because of its isolated location.	
oo	**Thomas Jefferson Memorial and Grounds:** The Committee generally supports improvements proposed for the Jefferson Memorial and grounds. We note that these are closely related to proposals for improvement of walkways around the Tidal Basin. Coordination is needed with the proposals for the Washington Channel outlined in the *Monumental Core Framework Plan*. The Committee is especially concerned with achieving an appropriate route for the Washington Waterfront Walk south of the Jefferson Memorial and on east to the Southwest Waterfront.	oo. Coordinated circulation is vital and is part of the preferred alternative.
	PART III: CLARIFICATIONS IN THE REPORT	
	The *Draft National Mall Plan/Environmental Impact Statement* is a lengthy and detailed document (600 pages). Steps to clarify certain points, especially key points, and to increase understanding, should be taken when possible. Comments on clarification of the Draft Plan report have been made by other agencies and groups. The Committee of 100 shares concerns about clarifying certain points where possible, especially with respect to a number of projects that are "in the pipeline" and moving forward and apparently will become a part of the National Mall landscape.	
pp	Three Authorized Projects: Three major projects on the National Mall have been authorized by the Congress and are moving ahead. The Martin Luther King, Jr. National Memorial is under construction and the National Museum of African American History and Culture and the Vietnam Veterans Memorial Visitor Center are moving through the design approval process. The location of these three major projects is left blank on some maps (Preferred Alternative Map, page 95 for example). It would aid understanding if these projects were shown and described at the appropriate location in the report.	pp. Ongoing projects have been added as an inset map on each alternative plan map.
qq	Current National Park Service Projects: At the present time, a number of significant projects by the National Park Service are either under construction on the National Mall or moving through the planning and approval process (see Table 41 on page 547). It would be useful if these projects could be indicated on the appropriate maps and described at the appropriate place in the report.	qq. A listing of priorities for these projects and a development map might accompany a programmatic agreement with the Advisory Council on Historic Preservation and the D.C. Historic Preservation Office.
rr	Provide Summary Information on the *White House and President's Park*: As mentioned in a previous section, The Committee of 100 on the Federal City and some other organizations have felt that National Mall should be defined somewhat more broadly, to include at least the Ellipse portion of the White House and President's Park (now a separate unit of the National Capital Region of the National Park Service).	rr. The White House and President's Park were addressed in the *Draft Environmental Impact Statement* on page 47.

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	It is now apparent that a broader definition of the National Mall will not be included in the current National Mall Plan. We believe that linkages between the National Mall and the White House and President's Park are important to understand. Therefor, at the minimum we suggest that the *Final National Mall Plan* at least include a summary description of the existing conditions in the White House and President's Park area, and the proposals in the adopted plan for that area. The description of the plan is very summary in nature.	
ss	Other Nearby Projects: The Draft Report includes some discussion on page 359 of nearby projects that will have a significant effect on the National Mall. These description could be more detailed in order to better understand linkages and potential impacts.	ss. We believe that including additional information about these projects is not needed for the National Mall plan and would unnecessarily add to the length of the document. The text explains the relationships between these projects to a sufficient degree to consider cumulative impacts.
tt	Clarify Origin of "National Mall" Term: The area now called "The National Mall" was for many years simply known as "The Mall". In fact, the National Park Service now uses the term, "The Mall" to refer to the portion of the National Mall from 1st Street to 14th Street. This is somewhat confusing and the confusion is not clarified in the present *Draft National Mall Plan/Environmental Impact Statement*. The Committee of 100 suggests that this confusion be clarified and, if possible, the way and the time when the term "National Mall" came into general use be explained.	tt. Since the terms 'Mall' and 'National Mall' have been used interchangeably, the *Draft Environmental Impact Statement* sought to carefully define and consistently use the terms. On page 4 the National Mall is defined to include three specific areas: the Mall, which extends from the grounds of the U.S. Capitol to the grounds of the Washington Monument (basically 1st to 14th streets); the Washington Monument grounds; and West Potomac Park, which is the setting for the Lincoln and Thomas Jefferson memorials, along with many other memorials. As described on page 252, the first use of the term 'Mall' was on a map in 1802. In the glossary on page 582 the Mall is defined the same way as the Mall System in the McMillan plan. The broader definition of the National Mall is again defined on page 582 and is consistent with the definition on page 4.
	PART IV: NEXT STEPS	
	In conclusion, the Committee of 100 on the Federal City appreciates the opportunity to comment on the *Draft National Mall Plan/Environmental Impact Statement*. We applaud the National Park Service for the work that has been done in bringing the Draft National Mall Plan to the present stage but, as noted above, we have serious concerns about some aspects of the Draft National Mall Plan as it exists today. However, in view of how this planning process has unfolded, we now understand that a somewhat less than comprehensive plan, including only the National Park Service areas of the National Mall, is what will go forward and be presented later this year (fall 2010) for adoption by the National Capital Planning Commission. While we wish the plan were more comprehensive, we understand that it is important for the National Park Service to have an approved National Mall Plan so that additional funding can be obtained for future National Mall improvements and increased maintenance that are needed.	
	Next Steps by the National Park Service	
uu	As the National Park Service moves forward over the next five-six months to prepare the Final National Mall Plan/Environmental Impact Statement, the National Mall Plan staff will need to consider comments of the National Capital Planning Commission, the U.S. Commission of Fine Arts, and other reviewing agencies, including District of Columbia agencies. We hope that suggestions from the Committee of 100 on the Federal City, and many other organizations and individuals, both in Washington and across the country, will also be seriously considered and that appropriate revisions in the final plan will be made.	uu. We agree.

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 18	
vv	We suggest two other steps to aid public understanding of the process of preparing the Final National Mall Plan. First, the comments of the various agencies, organizations and groups should be made available to the public as soon as possible after the comment period closes on March 18.	vv. The purpose of the *Final Environmental Impact Statement* is to respond to comments. The final document contains a summary of responses to comment topics, all comments received and NPS responses to substantive comments, a listing of all commenters and topics of interest, and data from online responses. The earliest possible time for this to occur is when the final document is published.
ww	Second, the final National Mall Plan that is presented to the National Capital Planning Commission for approval should include at least summary information on the comments that were considered and the reasons certain revisions were made (or not made).	ww. Please see the previous response.
	The Committee of 100 on the Federal City, of course, reserves the right to testify before the National Capital Planning Commission when the Final National Mall Plan is presented to them later this year.	
	National Mall Projects Moving Ahead: Even while the work on preparing the final National Mall Plan for adoption moves forward, a number of important projects are either under construction or in the planning stage. Three major projects on the National Mall have been authorized by Congress. The Martin Luther King, Jr. Memorial is now under construction, the National Museum of African American History and Culture is proceeding through the planning and design stage and the Vietnam Veterans Memorial Visitors Center is also in the design review stage.	
	The National Park Service will continue to move forward with the planning steps for a number of specific projects on the National Mall, as previously noted. We hope that various planning and design issues on these projects can be resolved in the coming months and that these projects can move into construction either later this year or in the next several years.	
xx	**National Mall National Register Nomination**: One of the suggestions made in the Section 106 process related to the National Mall Plan is that a National Register Nomination be prepared for the entire National Mall. The Committee of 100 on the Federal City supports this proposal. We realize that this work will likely take several years but we believe it will inform, and hopefully simplify, future decisions about the development and improvement of the National Mall. In this work, there should be special consideration of the way that the "mental image" and appreciation of the overall National Mall has changed over time and how and when the term "National Mall" has emerged and been accepted.	xx. We agree.
	Next Steps by Other Agencies	
	The Committee of 100 on the Federal City would still like to see a future comprehensive framework plan for the National Mall prepared, that would incorporate and integrate the National Mall Plan of the National Park Service as well as the plans of the other agencies with role in the future development of the National Mall (Smithsonian Institution, National Gallery of Art, Architect of the Capitol, Department of Agriculture, General Services Administration, District of Columbia and WMATA).	

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response
	Comments of The Committee of 100 on the Federal City on the Draft National Mall Plan/Environmental Assessment (December 2009) March 17, 2010 Page 19	
	A number of these agencies have planning efforts underway relating to the National Mall that should be part of an integrated framework plan. Various planning efforts by the Smithsonian Institution are underway that need to be considered. The Office of the Architect of the Capitol has prepared the *Capitol Complex Plan* which is undergoing internal review and hopefully will be released to the public later this year. The plans of the Architect of the Capitol are especially important at the east end of the National Mall, because land under the jurisdiction of the Congress abuts Union Square. As discussed previously, a coordinated approach to replanning and redesigning the entire Union Square area is essential.	
yy	The Committee of 100 understands that the work of the National Park Service in preparing this plan has involved ongoing coordination with all these agencies. However, in the end, the National Park Service has prepared a *Draft National Mall Plan* that deals primarily only with the National Mall lands under the jurisdiction of the National Park Service. The future plans of other agencies, especially the Smithsonian Institution and the Architect of the Capitol, are not clear in the Draft *National Mall Plan/Environmental Impact Statement*.	yy. Information about past, present, and reasonably foreseeable plans and projects was requested from the management entities of surrounding areas. They are described in the *Draft Environmental Impact Statement* in two areas: in "Purpose of and Need for the Plan" under "Interrelationships to Other Plans" (pp. 42–48) and in "Environmental Consequences" under "Methodology for Impact Analysis: Cumulative Impacts" (pp. 357–64). Also see letters 2.1 and 2.2 from the Architect of the Capitol and letter 7 from the Smithsonian Institution.
zz	We hope that once the National Park Service completes the Final National Mall Plan, that a summary plan report will be prepared that is easy for the public to use and understand, and also makes clear the ongoing projects on the National Mall. Such a summary report could be updated every few years and would therefore reflect the evolution of the National Mall and the progress being made in dealing with major problems.	As stated on pages 544–46 of the *Draft Environmental Impact Statement,* cooperating agencies participated in several multiday workshops to help develop planning principles, preliminary alternatives, and the preferred alternative, in addition to providing extensive comments during internal reviews of the draft document before its publication. Most cooperating agencies chose not to participate in consulting party meetings under section 106 of the National Historic Preservation Act. zz. It is our intention to prepare a summary plan once a record of decision has been signed.
	Increased National Mall Role for the National Capital Planning Commission	
	The Committee of 100 on the Federal City believes that the National Capital Planning Commission (NCPC), working in coordination with the U.S. Commission of Fine Arts, is the appropriate agency to undertake the next stage of work to prepare a comprehensive framework plan for the National Mall. As the federal government's planning agency in the District of Columbia and the surrounding counties in Maryland and Virginia, NCPC has long been concerned with the planning and development of the Monumental Core area of Washington, D.C., including the National Mall at the center of the Monumental Core. Since the Commission is composed of 12 members (three appointed by the President, including the chairman, three representatives of major federal agencies, two members of Congress, and four representatives of the District of Columbia, including the Mayor and Council Chair), it should be a position to work toward a unified plan for the National Mall.	
	Over the past several years, NCPC, the National Park Service, the Commission of Fine Arts, the Architect of the Capitol and the District of Columbia Government have been working together on the "Planning Together for Central Washington" program. This has been a very beneficial program. It is unfortunate that the various elements have proceeded on different schedules, though perhaps that is inevitable with a program that is so complex.	
	As part of that work, the National Capital Planning Commission and the Commission of Fine	

Comment	Letter 13. The Committee of 100 on the Federal City (cont.)	Response

Arts worked together to complete the study of the area around the National Mall. That work was summarized in the report, *Monumental Core Framework Plan: Connecting New Destinations with the National Mall*. That report was approved by the National Capital Planning Commission in and by the Commission of Fine Arts in spring 2009.

The Committee of 100 believes that NCPC must now step up and undertake additional work to bring the still unresolved elements of the National Mall into a coordinated framework. The Committee of 100 will urge that NCPC undertake that work. We know that the National Park Service has been working closely with the NCPC staff while preparing the Draft National Mall Plan and we would expect that close working relationship to continue. NCPC could also take other steps, including hiring consultants or convening committees of experts for advice on specific elements of the National Mall. However, the key need is to make sure that plans of the various agencies with an interest in the Mall are coordinated in an imaginative way.

It is also that the future overall plan for the National Mall be presented in a way that is effective and understandable, both to people in Washington and to citizens across our country. We hope that NCPC will be willing to pick up this challenging assignment and carry it the next step.

We look forward to continuing to work with the National Park Service in planning the future of the National Mall. This is truly a work that is important to all Americans, including those of us who live and work in Washington, D.C. and in the Washington region.

Sincerely,

John Fondersmith

John Fondersmith, AICP
Representing the Committee of 100 on the Federal City
in the National Mall Plan Process

George R. Clark

George R. Clark, Chair
Committee of 100 on the Federal City

Comment	Letter 14.1. D.C. Preservation League	Response

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The mission of the DC Preservation League is to preserve, protect, and enhance the historic and built environment of Washington, DC, through advocacy and education.

Testimony of the D.C. Preservation League before the National Capital Planning Commission on the National Park Service Draft National Mall Plan/Environmental Impact Statement

March 4, 2010

My name is Edwin Fountain. I am a past president and trustee of the DC Preservation League ("DCPL"), and the League's delegate to the Section 106 proceedings conducted by the Park Service with respect to the National Mall Plan. DCPL is the leading non-profit organization dedicated to preservation of historic resources in the Nation's capital. We appreciate the opportunity to provide these comments as part of the ongoing review of the National Mall Plan.

At the outset, DCPL commends the efforts of NPS staff for the hours of work and devotion to the Mall that they have obviously dedicated to the development of the preferred alternative and the Section 106 process; for their patience and professionalism in wrangling so many consulting parties who are equally passionate about the past and future of this invaluable, and incomparable, historic national resource; and for the care they have taken to reconcile the many competing purposes of the Mall so as to continue to serve the needs of all the Mall's constituencies.

The Park Service has shown an obvious and commendable regard for preservation of historic resources, and the material adverse impacts on sites of historical significance are relatively few and minor. Consequently, DCPL finds much to commend and little to critique in the particulars of the preferred alternative. I will set forth our chief comments, and then I will address a larger issue that goes beyond the purview of the document before us, but which provides critical context for properly assessing the National Mall Plan.

Comments on the preliminary preferred alternative

As an initial matter, DCPL understands that the preferred alternative merely sets forth broader contours of an integrated plan for the Mall, that the Section 106 review conducted to date is only the first stage of an ongoing review, and that as specific components are implemented -- *e.g.*, re-design of Union Square -- each of those "sub-undertakings" will be subject to further review and comment. DCPL's comments today are subject to those understandings.

[Editor's Note: On March 4, 2010, Edwin Fountain, representing the D.C. Preservation League, provided testimony to the National Capital Planning Commission on the *Draft National Mall Plan / Environmental Impact Statement*.]

Comment	Letter 14.1. D.C. Preservation League (cont.)	Response
	Where features of the preliminary preferred alternative plan are not addressed, DCPL supports or at least has no objection to those features. Union Square • We concur with the retention of Union Square as a Civil War memorial space, with the Grant Memorial as its primary feature. With a *de facto* 20th-century "war memorial park" now situated around the Lincoln Reflecting Pool, it is appropriate that the Civil War also be commemorated on the Mall. For the same reason, the Grant Memorial should remain as a counterpart on the Mall to the Lincoln Memorial, as they were the central figures in the greatest cataclysm in the country's history. • The elements of the reflecting pool and the broad, paved plaza, however, lack historical significance, and may be removed or reconceived, consistent with the purposes and uses outlined in the preferred alternative plan. • We are concerned, however, with the placement of amenities within the tree areas of this space. Unlike the elm panels along the Mall proper, which are extensive enough that they can accommodate physical structures with relatively little visual or other impact, the presence of buildings in these sites on Union Square could have a much more significant effect. We anticipate that this concern will be addressed as the Park Service proceeds to more detailed planning.	
A		A. You are correct that the placement of amenities will be addressed as more specific design and construction documents are prepared. The protection of trees has been identified as one of the design criteria (DEIS, p. 88). Responses 2.1 and 2.2 also address design criteria and coordination with the Architect of the Capitol.
	National Mall (between 3rd and 14th Streets) • We are likewise concerned with the notion of a paved area for events between the National Gallery of Art Sculpture Garden and center grass panels, and staging space on the 12th Street axis and over the 12th Street tunnel entry north of Madison Drive. Such hard-surface, utilitarian spaces are at odds with the fundamental nature of this portion of the Mall, and should be minimized and softened as much as possible. With respect to infrastructure supporting large-scale events, we urge the Park Service to consider more mobile facilities that can be removed from these areas when not in use.	
B		B. We agree that a utilitarian space over the 12th Street tunnel should be softened as much as possible. Currently, the National Park Service uses mobile facilities for national celebrations. However, the frequent placement of temporary structures on the Mall often results in a conglomeration of trailers that resembles a construction zone. This situation generates heartfelt complaints about visits being less enjoyable than expected. We have proposed more active monitoring of resources and events, and event sponsors could benefit from a small flexible office space.
	Washington Monument and grounds • We have no objection to the proposed redevelopment of the Sylvan Theatre site. Constitution Gardens • We have no objection to the proposed redevelopment of the area at the east end of Constitution Gardens -- with the important caveat that any such development and use should not encroach visually or aurally on nearby World War II and Vietnam War memorials. We concur with prior comments from the National Trust and the Committee of 100 that architectural features here should be "festive yet dignified," and could be distinctive to this area of the Mall, while referential to other facilities on the Mall.	
C		C. We agree that proposed facilities should not encroach on nearby memorials, and these comments provide criteria for design.

Comment	Letter 14.1. D.C. Preservation League (cont.)	Response
D	• The reference in the plan to relocating the Lock Keeper's House away from its current location is somewhat indeterminate. As the Lock Keeper's House is no longer in its original location, we have no objection to additional re-location, so long as it preserves its basic spatial orientation to the siting of the historic canal. The remaining features of the preferred alternative plan indicate no material adverse effects to historic properties. Those are DCPL's comments on the particular features of the preferred alternative. DCPL does wish to raise with this Commission a larger concern, reflecting the fact that the preferred alternative is overly narrow with respect to the metes and bounds of the overall planning area. This is because the preferred alternative is limited to areas within the jurisdiction of the National Park Service. We understand that the Park Service can only plan for what the Park Service controls. But the lines on a map demarking the Park Service's jurisdiction are not visible to visitors to the Mall, and they likewise should not define the scope of such a significant planning process. To begin with, planning for the usage and aesthetic design of the Mall within the vacuum of Park Service jurisdiction foregoes consistency of design among Park Service and adjacent properties.	D. We agree, and retaining this spatial orientation is discussed in the *Draft Environmental Impact Statement* on page 378.
E	More significantly, it requires placement of all visitor amenities on NPS property, and none on property of adjacent federal (or federally-chartered) entities. From the standpoint of historic preservation, by trying to accommodate all the desired uses and amenities of the Mall on property managed by the Park Service, the Park Service necessarily concentrates the impacts on historic properties on its own property, while limiting the options for mitigation. What the preferred alternative lacks is any inter-agency planning to coordinate uses and effects among the Mall and its adjacent properties. Two examples -- both reflected in the concerns we stated earlier -- illustrate this clearly:	E. The placement of all visitor amenities on NPS property is not required. The plan recognizes that facilities in adjacent museums also meet the needs of visitors. Public facilities on and adjacent to the National Mall are listed in Tables 20 and 21 in the *Draft Environmental Impact Statement* (pp. 333–36). As stated in *Draft Environmental Impact Statement* on pages 90 and 210, the National Park Service will continue to explore the ability of adjacent museums to provide new access to existing or proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information.
F	• First, with respect to the development of infrastructure in Union Square, the U.S. Botanical Garden and Architect of the Capitol should be involved to develop an amenity plan that serves Union Square and the adjoining north-south parcels in a coordinated way, so as to reduce impacts on all three sites.	F. See letters 2.1 and 2.2 from the Architect of the Capitol. In letter 2.2 they concur with your comment.
G	• Second, the development of fixed, hard-surface utility areas to support large events on the Mall should likewise be the subject of inter-agency discussions to determine if such facilities can be located off of Park Service property, so as to reduce or eliminate impact on the Mall grounds proper. Other participants in the Section 106 review process have expressed similar concerns, and have called for a third-century plan for the National Mall. And that is a worthy goal, for today's plans become tomorrow's history. Any planning effort must look forward, not merely backward, and create something that 100 years from will itself be deemed worthy of preservation. That requires planning for the Mall to occur in a larger context than is presented here.	G. These topics have been and will continue to be part of ongoing interagency discussions. The development of additional paved areas for event infrastructure would be carefully designed to be worthy of the planning and design history of the National Mall, as well as its vital and visible civic role.

Comment	Letter 14.1. D.C. Preservation League (cont.)	Response
H	This Commission does not need to hear that advice from us, for the Extending the Legacy plan and Monumental Core Framework plans are clearly intended to provide the basis for the evolution of the Mall in the 21st century. Those plans, taken together, may well receive from our successors the same reverence that we give the L'Enfant and McMillan plans today. But what the Park Service's current effort appears to demonstrate is the pitfalls of implementing such a plan on an agency-by-agency basis. We are informed that the Park Service has worked closely with the other stakeholders of the Mall. What does not appear in the preferred alternative is any sense that those other stakeholders are making their own contributions to the comprehensive and optimal development of the Mall. It is too much to expect one agency, or even a committee of agencies, to successfully implement any 21st-century plan for the Mall and the monumental core. The challenge before this Commission is to secure for its plans the political weight necessary to implement those plans on an inter-agency, inter-jurisdictional basis. Without that political weight, any plan runs a considerable risk of being implemented haphazardly, intermittently, and incompletely -- and worst, incoherently. For these reasons, as with the L'Enfant and McMillan plans, such a plan needs the imprimatur of nation's highest leaders. It needs to be commissioned or endorsed by Congress or the President, and it needs to be identified with individuals of national significance. Ten years ago it could have known as the Moynihan Plan; today it could be the namesake of some equally eminent national figure. The National Mall Plan may well be a worthy step in implementing the plans this Commission has made for the future development of the capital. But we urge the Commission to consider how to elevate those plans, so that all interested agencies and jurisdictions implement them on a more coordinated basis. DCPL appreciates the opportunity to comment to you on the preferred alternative plan, and looks forward to further Section 106 participation. Edwin L. Fountain Past President, DC Preservation League	H. Cooperating agencies have contributed extensively and have participated in more than 11 workshops. Other stakeholders, such as consulting parties, have contributed substantially to the development of the range of alternatives and the development of the preferred alternative.

Comment	Letter 14.2. D.C. Preservation League	Response

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Comments of the D.C. Preservation League
to the National Park Service on the
Draft National Mall Plan/Environmental Impact Statement

March 18, 2010

The D.C. Preservation League ("DCPL"), the leading non-profit organization dedicated to preservation of historic resources in the Nation's capital, appreciates the opportunity to provide these comments as part of the ongoing review of the National Mall Plan.

At the outset, DCPL commends the efforts of NPS staff for the hours of work and devotion to the Mall that they have obviously dedicated to the development of the preferred alternative and the Section 106 process; for their patience and professionalism in wrangling so many consulting parties who are equally passionate about the past and future of this invaluable, and incomparable, historic national resource; and for the care they have taken to reconcile the many competing purposes of the Mall so as to continue to serve the needs of all the Mall's constituencies.

The Park Service has shown an obvious and commendable regard for preservation of historic resources, and the material adverse impacts on sites of historical significance are relatively few and minor. Consequently, DCPL finds much to commend and little to critique in the particulars of the preferred alternative. This submission will set forth our chief comments, but then address a larger issue that goes beyond the purview of the draft plan, but which provides critical context for properly assessing the National Mall Plan.

Comments on the preliminary preferred alternative

As an initial matter, DCPL understands that the preferred alternative merely sets forth broader contours of an integrated plan for the Mall, that the Section 106 review conducted to date is only the first stage of an ongoing review, and that as specific components are implemented -- *e.g.*, re-design of Union Square -- each of those "sub-undertakings" will be subject to further review and comment. DCPL's comments today are subject to those understandings.

Comment	Letter 14.2. D.C. Preservation League (cont.)	Response
	Where features of the preliminary preferred alternative plan are not addressed, DCPL supports or at least has no objection to those features. Union Square • We concur with the retention of Union Square as a Civil War memorial space, with the Grant Memorial as its primary feature. With a *de facto* 20th-century "war memorial park" now situated around the Lincoln Reflecting Pool, it is appropriate that the Civil War also be commemorated on the Mall. For the same reason, the Grant Memorial should remain as a counterpart on the Mall to the Lincoln Memorial, as they were the central figures in the greatest cataclysm in the country's history. • The elements of the reflecting pool and the broad, paved plaza, however, lack historical significance, and may be removed or reconceived, consistent with the purposes and uses outlined in the preferred alternative plan.	
A	• We are concerned, however, with the placement of amenities within the tree areas of this space. Unlike the elm panels along the Mall proper, which are extensive enough that they can accommodate physical structures with relatively little visual or other impact, the presence of buildings in these sites on Union Square could have a much more significant effect. We anticipate that this concern will be addressed as the Park Service proceeds to more detailed planning.	A. Please see response to 14.1A.
	National Mall (between 3rd and 14th Streets)	
B	• We are likewise concerned with the notion of a paved area for events between the National Gallery of Art Sculpture Garden and center grass panels, and staging space on the 12th Street axis and over the 12th Street tunnel entry north of Madison Drive. Such hard-surface, utilitarian spaces are at odds with the fundamental nature of this portion of the Mall, and should be minimized and softened as much as possible. With respect to infrastructure supporting large-scale events, we urge the Park Service to consider more mobile facilities that can be removed from these areas when not in use.	B. Please see response to 14.1B.
	Washington Monument and grounds • We have no objection to the proposed redevelopment of the Sylvan Theatre site.	
	Constitution Gardens	
C	• We have no objection to the proposed redevelopment of the area at the east end of Constitution Gardens -- with the important caveat that any such development and use should not encroach visually or aurally on nearby World War II and Vietnam War memorials. We concur with prior comments from the National Trust and the Committee of 100 that architectural features here should be "festive yet dignified," and could be distinctive to this area of the Mall, while referential to other facilities on the Mall.	C. Please see response to 14.1C.

Comment	Letter 14.2. D.C. Preservation League (cont.)	Response
D	• The reference in the plan to relocating the Lock Keeper's House away from its current location is somewhat indeterminate. As the Lock Keeper's House is no longer in its original location, we have no objection to additional re-location, so long as it preserves its basic spatial orientation to the siting of the historic canal. The remaining features of the preferred alternative plan indicate no material adverse effects to historic properties. **Comments on comprehensive forward planning for the National Mall.** Those are DCPL's comments on the particular features of the preferred alternative. DCPL does wish to raise with a larger concern, reflecting the fact that the preferred alternative is overly narrow with respect to the metes and bounds of the overall planning area, and with respect to the scope of the planning effort itself. The preferred alternative is limited to areas within the jurisdiction of the National Park Service. Indeed, the document specifically -- and with some circularity -- "define[s] the National Mall to include three specific areas over which the agency has legal jurisdiction." Draft National Mall Plan/EIS at 125. We understand that the Park Service can only plan for what the Park Service controls. But the lines on a map demarking the Park Service's jurisdiction are not visible to visitors to the Mall, and do not limit visitors' conception of the Mall, and they likewise should not define the scope of such a significant planning process.	D. We agree. Please see response 14.1D.
E	To begin with, planning for the usage and aesthetic design of the Mall within the vacuum of Park Service jurisdiction foregoes consistency of design among Park Service and adjacent properties. More significantly, it requires placement of all visitor amenities on NPS property, and none on property of adjacent federal (or federally-chartered) entities. From the standpoint of historic preservation, by trying to accommodate all the desired uses and amenities of the Mall on property managed by the Park Service, the Park Service necessarily concentrates the impacts on historic properties on its own property, while limiting the options for mitigation. What the preferred alternative does not reflect is any inter-agency coordination of uses and effects among the Mall and its adjacent properties. Three examples -- two of them reflected in the concerns we stated earlier -- illustrate this clearly:	E. Please see response 14.1E.
F	• First, with respect to the development of infrastructure in Union Square, the U.S. Botanical Garden and Architect of the Capitol should be involved to develop an amenity plan that serves Union Square and the adjoining north-south parcels in a coordinated way, so as to reduce impacts on all three sites.	F. Please see response 14.1F.
G	• Second, the development of fixed, hard-surface utility areas to support large events on the Mall should likewise be the subject of inter-agency discussions to determine if such facilities can be located off of Park Service property, so as to reduce or eliminate impact on the Mall grounds proper.	G. Please see response 14.1G.

H

- Third, the Smithsonian Arts & Industries Building is obviously a potential resource for location of amenities, visitor welcome facilities, or event management infrastructure that otherwise the preferred alternative plan proposes to locate on the Mall's open space.

Other participants in the Section 106 review process have expressed similar concerns, and have called for a planning commission for the National Mall, similar to the McMillan Commission. The Park Service rejects that proposal, on the grounds that "it would necessarily supersede the purview of" the Commission of Fine Arts and the National Capital Planning Commission. Draft National Mall Plan/EIS at 127. Well, precisely. What the Park Service's current effort appears to demonstrate is the pitfalls of implementing plans on an agency-by-agency basis. We are informed that the Park Service has worked closely with the other stakeholders of the Mall. What does not appear in the preferred alternative is any sense that those other stakeholders are making their own contributions to the comprehensive and optimal development of the Mall.

I

It is too much to expect one agency, or even a committee of agencies, to successfully implement any plan for the Mall and the monumental core. What distinguishes the McMillan Commission from the NCPC is that the former was directly commissioned by, and thereby carried the authority of, the nation's highest political leaders. The re-shaping of the Mall that occurred in the 20th century could not have occurred without the weight of Congressional and Presidential support behind its fundamental concepts. Similarly, any plan today requires greater authority to be successfully implemented on an inter-agency, inter-jurisdictional basis. Without similar political authority and momentum behind it, the NCPC plan runs a considerable risk of being implemented haphazardly, intermittently, and incompletely -- and worst, incoherently.

Similarly, proponents of a Mall planning commission have called for a third-century plan for the Mall. And that is a worthy goal, for today's plans become tomorrow's history. Any planning effort must look forward, not merely backward, and create something that 100 years from will itself be deemed worthy of preservation. That requires planning for the Mall to occur in a larger context than is presented here.

J

The draft plan rejects the need for a third-century plan, deferring to the National Capital Planning Commission's Extending the Legacy and Monumental Core Framework plans. Draft National Mall Plan/EIS at 126-27. Perhaps those plans, taken together, will one day receive from our successors the same reverence that we give the L'Enfant and McMillan plans today.

But again, what distinguishes the L'Enfant and McMillan plans from the NCPC plans is that the McMillan Commission deliberately set out to re-envision the Mall, while the NCPC takes the Mall as a static, "substantially completed work of civic art," as set forth in the Commemorative Works Act, 40 U.S.C. § 202(a)(1). NCPC and NPS are of course bound to start from that premise, dictated to them by Congress. But while that Congressional finding, which was an important response to the impending profusion of new monuments, memorials and museums on the Mall, it forecloses the continuing long-term growth and evolution of the Mall

The very purpose of a third-century commission (in addition to overcoming the frictions inherent in any inter-agency, inter-jurisdictional process) is to re-visit the question answered by the Commemorative Works Act. It is with considerable trepidation that we suggest asking the

H. The Arts and Industries Building may well be a resource for visitor amenities. While it may have limitations to achieving museum standards, your suggestion for event management creatively expands on the concept of visitor amenities. With its open character it could potentially be used for numerous educational and cultural functions and performances, and thus it could take pressure off the Mall.

As stated on page 24 of the *Draft Environmental Impact Statement,* the Arts and Industries Building is undergoing repair and preservation work, and the Smithsonian Institution has been asked that no permanent decision be made about the building's use until a site assessment by the National Museum of the American Latino Commission has been completed.

I. Please see response 14.1H.

J. We agree with your point that planning must look forward and not just back, and we agree that the National Mall will continue to evolve.

Change is a constant and despite landmark plans for Washington, D.C., it was clear by the beginning of the 21st century that the National Mall was never designed for present levels of civic use, tourism, recreation, and cultural activities. When this planning effort began, memorial proposals being considered in Congress or proposed by various groups frequently mentioned the need to be on the National Mall. It was clear that the continuation of present conditions would be unsustainable, along with degraded natural resources, aging infrastructure, congestion, and unmet visitor needs.

The National Mall is our nation's primary civic space, a beloved symbol of our country, and a commemorative landscape, with possibly the highest concentration of museums in the world. High use levels will continue and demands on the civic space will be enormous. However, the National Mall is different from most of the world's other great civic spaces, which are most frequently hard-surface plazas and squares that are relatively easy to maintain. The National Mall is a designed landscape whose primary characteristics include turf and trees, and these natural components require far more care.

The bold proposals in the National Mall plan include re-envisioning Union Square, increasing civic uses in a manner that retains the visual appearance of a continuous landscape, rethinking single-purpose visitor facilities and better dispersing them, and focusing on improved multimodal circulation with more pleasant pedestrian and bicycling opportunities. These visions respect the past while preparing for the future. As such they are bound to generate some controversy. Reconciling competing needs and constituencies can be a challenge. The National Park Service cares for America's national parks, including the National Mall, and the proposed plan is fundamental to our responsibility. Its purpose is to provide a coordinated and comprehensive written program for future action prepared with public involvement and NEPA environmental analysis.

Defining a great American civic space within a designed landscape may seem like an oxymoron, but it truly represents the importance of land and citizens together as a national story. The National Mall plan is a chapter in an ongoing story of our nation's capital.

Comment	Letter 14.2. D.C. Preservation League (cont.)	Response
J (cont.)	question, "How should the Mall change (if at all)?", given the narrow interest-group considerations that would inevitably come to the fore. (As the Park Service correctly recognizes, such a commission would "creat[e] another advocacy or grievance forum." Draft National Mall Plan/EIS at 127.) And it may well be that the answer to such a question would be a call to more fully implement the McMillan plan or other plans that have gone before. But the irony of historic preservation is that all buildings and places that are now deemed historic themselves were built on some other "historic" site, and many of them were controversial at the time they were built. We believe the question is worth asking. We recognize that such long-term visioning is beyond the purview of the Mall planning and improvement effort that the Park Service has undertaken. But just as it is not the Park Service's place to create such a plan on its own, nor is the Park Service's place to reject it on its own. We urge the National Park Service, along with all other stakeholders and supporters of the National Mall, to continue to address the question whether the Mall should be deemed "completed." DCPL appreciates the opportunity to comment on the preferred alternative plan, and looks forward to further Section 106 participation. Edwin L. Fountain Past President, DC Preservation League DCPL representative to Section 106 proceedings on the National Mall Plan	

Comment	Letter 15. Downtown DC Business Improvement District	Response
	 Business Improvement District STATEMENT REGARDING THE NATIONAL MALL PLAN To the National Capital Planning Commission From Richard H. Bradley, Executive Director, Downtown Business Improvement District, Washington DC Thursday, March 4, 2010 Mr. Chairman and Commission Members: The Downtown Business Improvement District is pleased to offer testimony in enthusiastic support the draft of the National Park Service's National Mall Plan. The Downtown BID is a private non-profit organization that provides hospitality, maintenance and beautification services, as well as capital improvements, resources and research to help diversify the economy and enhance the Downtown experience for all. This special district, where property owners have agreed to tax themselves to fund services, encompasses a 138-block area of approximately 825 properties from Massachusetts Avenue on the north to Constitution Avenue on the south, and from Louisiana Avenue on the east to 16th Street on the west. The Downtown BID is a Section 106 consulting party to the National Mall Plan initiative. As such, NPS has encouraged us to be involved in the plan every step of the way. We have participated to the best of our ability. We feel that the plan readies for action much of what the Downtown BID sees as being needed at the National Mall, i.e.: 1. The National Mall Plan promotes a *world-class landscape* that will tell in an improved manner the story of America to visitors from all over the world. The plan protects the historic landscape of the McMillan Plan. NPS rightly cites the condition of turf and the viability of American elm trees to be critical problems and identifies corrective measures. The National Mall would become more user friendly, with more restrooms, better facilities for food and drink, better situated ranger locations and improved wayfinding signage. 2. At the same time, the National Mall Plan helps to create a *high-quality local greenspace* that serves local residents and workers and ties together the center city--Downtown and Foggy Bottom on the north with the Haines Point and Southwest DC on the south, the U.S. Capitol on the east with the Lincoln Memorial on the west. Flood control improvements (some of which predate the National Mall Plan) would help ensure that parts of the National Mall would not be underwater so often, so roads and playing fields would be usable. A wide range of ecological improvements would complement Mayor Fenty's efforts to "green" the city and private developers' efforts to "green" Downtown along with the U.S. General Services Administration and the Downtown BID. In particular, replacing the currently used potable water in the Reflecting Pool, Constitution Gardens Lake and Union Square Pool with Potomac River water is a great ecological improvement.	[EDITOR'S NOTE: On March 4, 2010, Richard Bradley of the Downtown D.C. Business Improvement District provided testimony to the National Capital Planning Commission on the *Draft National Mall Plan / Environmental Impact Statement.*]

Comment	Letter 15. Downtown DC Business Improvement District (cont.)	Response
A	3. The National Mall Plan suggests multiple forms of *public transportation* to make the various locations on the National Mall accessible to the public—including low-income and physically handicapped persons—through frequent, affordable public transit. The Downtown BID urges NPS to move ahead promptly with improvements to public transportation and would urge using increased National Mall parking revenues to help pay for such improvements. We also propose that NPS redouble efforts to partner with the city to invest in infrastructure for improved tour bus parking. 4. The National Mall Plan supports *special events* being held more frequently on lesser-used Mall spaces. Improvements to the Union Square area—including a well-designed hardscape—will help limit the turf damage that discretionary special events and mandatory First Amendment demonstrations bring. We urge NPS to invest in their "uptown parks"—e.g., Pershing Park, Freedom Plaza, John Marshall Park, Franklin Square, and McPherson Square--so these public spaces can host more special events and better serve our center city. . We look forward to working with NPS on a future planning initiative to make Pennsylvania Avenue—including its parks--truly one of America's great streets.	A. Thank you for your ongoing interest and support for the uptown parks.
B		B. We too look forward to resuming planning for Pennsylvania Avenue.
C	The Downtown BID commends NPS for considering the Downtown BID's opinions , and, more importantly, the opinions of other city stakeholders' through the recommendations of the Center City Action Agenda, CapitalSpace and the Monumental Core Framework Plan in drawing up its draft National Mall Plan. The Downtown BID is pleased that basic consumer research was an ingredient of the National Mall Plan; we would recommend improved and continual research on the number, origin and type of users of the National Mall. Although the details of a number of National Mall Plan recommendations undoubtedly can be debated, the many proposed major projects and programs are solid. There is no doubt they will result in a much-improved National Mall. Now is the time to finalize this draft National Mall Plan and move ahead on the long road of implementing the plan. Each significant project and program will require a plan in its own right; the Downtown BID participated over the past year in just such a plan for wayfinding signage. It is in these individual plans that important details should be addressed. More importantly, each project and program will require significant *funding*. The Downtown BID commends the efforts of the Trust for the National Mall. We note that substantial and consistent funding will need to be provided by Congress over the next decade to implement the plan, lest it become another forsaken list of wishes. Thank you for your attention. I would be glad to answer any questions.	C. The planning team has worked with city and federal agencies to ensure coordination and compatibility between the plans you describe.

Comment	Letter 16. Eisenhower Memorial Commission	Response
	Statement by Daniel J. Feil FAIA **In behalf of the Eisenhower Memorial Commission** **Regarding the Draft National Mall Plan** **Before the National Capital Planning Commission** **On March 4, 2010** My name is Daniel Feil. I am Executive Architect for the Eisenhower Memorial Commission. On behalf of the Eisenhower Memorial Commission, I appreciate the opportunity to address NCPC this afternoon. The Eisenhower Memorial Commission was invited to be a Consulting Party under the National Historic Preservation Act Section 106 process. Development of the Draft National Mall Plan by the National Park Service required the coordination of existing plans, numerous federal and local agencies and many interest groups, over a long period of time. My Commission commends the thoroughness of the Plan and the openness of the process led by the National Park Service which produced it. The approved four [4] acre site for the Eisenhower Memorial is located just south of The National Mall, across from Independence Avenue, between 4th and 6th Streets, SW. It will occupy one of the "top twenty" memorial sites identified in the *Memorials and Museums Master Plan* adopted by NCPC and the Commission of Fine Arts in 2001. The Draft National Mall Plan greatly advances the opportunities for improvements to its subject area, which will be the Eisenhower Memorial's immediate neighbor to the north. The Eisenhower Memorial Commission fully supports the Plan's efforts to provide a framework for restoration, refurbishment, design and development, with its keen awareness of historic resource management. The Draft Plan addresses vistas which begin and end within the National Mall, even if their trajectory goes outside the National Mall boundaries. Vista C is one such designated "Important Vista". It is depicted on the Important Vistas graphic on page 268 of the Draft National Mall Plan / Environmental Impact Statement as well as on the Urban Design Framework graphic on page 45 of the same volume. The Eisenhower Memorial Commission agrees that this vista is an important feature of the L'Enfant Plan and it is committed to respecting the vista as the Eisenhower Memorial design is developed. This commitment was made as part of the Site Approval process and is repeated here relative to the Draft National Mall Plan. The Eisenhower Memorial Commission appreciates being included in the process that produced the Draft National Mall Plan and the Plan's respect for previous decisions by NCPC and CFA. Thank you.	[EDITOR'S NOTE: On March 4, 2010, Daniel Feil of the Eisenhower Memorial Commission provided testimony to the National Capital Planning Commission on the *Draft National Mall Plan / Environmental Impact Statement.*]

Comment	Letter 17. Guest Services, Inc.	Response

GUEST SERVICES™

March 18, 2010

National Mall and Memorial Parks
Attn: National Mall Plan
900 Ohio Drive, SW
Washington, DC 20024

To Whom It May Concern:

Guest Services, Inc. has been the Concessionaire on the National Mall and Memorial Parks for many years and we have worked with the National Park Service on many projects.

Our most recent projects were the building of two facilities near the Lincoln Memorial. Both facilities operate with Geo-Thermal systems that help reduce refrigerates used, energy reduction, and water conservation.

It has been an honor being a consulting party member to this Section 106 Environmental Impact Statement for the National Mall. The historic information, the knowledge, the opinions, the passion, and the concern that we have witnessed during these meetings has enlightened us to the process the National Park Service puts into its planning.

Guest Services supports the Preferred Alternative Plan. We find the plan provides the National Park Service with the flexibility that is going to be needed in the future and allows for the best possible protection of the natural and cultural resources, while addressing the needs of the growing number of visitors to the National Mall.

The future holds a balancing act of managing the natural resource, our first amendment rights, our cultural resources, and infrastructure planning that reaches years beyond our time.

Thank you for the opportunity to express our views during the meetings and our choice of plans.

Sincerely,

Daniel A. Maillet
Director of Construction/Environmental Management

3305 Prosperity Avenue Fairfax, VA 22031 703.849.9300

Comment	Letter 18. Guild of Professional Tour Guides	Response
A	March 10, 2010 National Mall and Memorial Parks ATTN: National Mall Plan 900 Ohio Dr. SW Washington, DC 20024 Gentlemen, The Guild of Professional Tour Guides has reviewed the "Draft National Mall Plan/Environmental Impact Statement" of December 2009. We are extremely gratified that many additional water fountains and rest rooms are included in the Plan. We have one minor comment/recommendation. On page 92 and page 216, mention is made concerning possible relocation of the Lock Keeper's House. We recommend that it be retained in its present location as it is inextricably linked with the operation of the Washington Canal. To move it to a different location would detract from its historical context. If there is sufficient reason to move, relocate it to the west and keep its present proximity to Constitution Ave. unchanged. Sincerely, James W. Heegeman President	A. The plan includes the criteria you and section 106 consulting parties discussed for the Lockkeeper's House; see page 378 of the *Draft Environmental Impact Statement.*

Comment	Letter 19.1. National Coalition to Save Our Mall	Response
	Testimony by the National Coalition to Save Our Mall before the National Capital Planning Commission on the National Park Service National Mall Plan March 4, 2010	[Editor's Note: On March 4, 2010, Judy Scott Feldman of the National Coalition to Save Our Mall provided testimony to the National Capital Planning Commission on the *Draft National Mall Plan / Environmental Impact Statement.*]
	Good morning, Chairman Bryant and Commissioners. I am Judy Scott Feldman, chair and president of the nonprofit citizens organization, National Coalition to Save Our Mall. The Coalition has been a strong supporter of the Park Service's Mall planning efforts. In commenting on the Plan, one of our main interests has been to maintain and enhance the symbolic quality of the Mall.	
A	In 2005, Park Service and NCPC representatives testified before Congress they would work together on a new Mall master plan, but this plan has evolved into a more modest, Park Service-centered project. As the Park Service now states, it focuses only on National Park Service portions of the Mall. It is not a vision for the entire Mall that gives equal weight to the interests of the Smithsonian, Architect of the Capital, National Gallery and other institutions on the Mall. It consists of a set of broad "concepts" to guide future development. Is this what the NCPC believes this plan should be?	A. The proposed plan meets the requirements of the National Capital Planning Commission (see letters 6.1 and 6.2).
	Because of its limited and conceptual quality, and the absence of any designs or plans to show what physical impact these improvements will have on the Mall, the public can only at this point comment on whether these are good ideas. Many of them seem to be – improve the grass, repair monuments and walkways. Other proposals are more troubling, such as hard paving the gravel walkways and new large plazas, and introducing numerous kiosks, restaurants, restroom facilities, and visitor centers on the open space that could have dramatic and adverse impacts on the historic quality and landscape character of the National Mall. Does NCPC feel that this plan will assist them in evaluating all the smaller scale plans that will follow?	
	Our concern is that because this is not a plan but only concepts, what happens next is critical. The NCPC Staff Report supports Park Service plans to move forward to develop these concepts, but there are several important missing steps that need to be taken and which might make reviewing future projects a more meaningful process.	
	We offer the following recommendations:	
B	1. NCPC should work with the Park Service to come up with a name that more accurately represents the Park Service-centered scope, purpose, and goals of the plan: maybe the "National Park Service Concept Plan for its holdings on the National Mall."	B. The planning agency determines the title. The proposed National Mall plan is a vision plan, comparable with a general management plan that the National Park Service prepares for all units of the national park system. This title is appropriate.
C	2. NCPC should advise Congress of the need immediately to start work on an independent, inter-disciplinary visionary Mall Plan that includes all stakeholders and robust public input. Why is this important? Because the visionary plan would look beyond basic maintenance to long-range future opportunities such as Mall expansion. Instead of accepting the 2003 security plan for the Washington Monument grounds as the new master plan, as the NCPC Staff Report recommends, consideration could be given to finding a way to make the Monument grounds truly the centerpiece of the Mall and the City it was intended to be.	C. Please see the description in the *Draft Environmental Impact Statement* on pages 126–27.

Comment	Letter 19.1. National Coalition to Save Our Mall	Response
D	3. NCPC should assist the Park Service in developing, in concert with each and all Mall stakeholders, Mall-wide standards, principles, and guidelines. Why is this important? Because consolidating planning would maximize continuity across jurisdictions and benefits to the American public, and at the same time minimize duplication and adverse impacts on the sensitive landscape. For example, new visitor centers and restroom facilities could be located to the sides, in or near existing museum buildings, instead of on the open space. The American public experiences the Mall as one continuous space; it must not be treated as collection of separate jurisdictions. These Mall-wide plans should include a landscape restoration plan, a visitor services plan, guidelines for components such as pools, water sources, lighting, and a low-cost circulation plan. The public *still* has no knowledge of anything going on in developing low-cost circulation and transportation – as distinct from the Park Service exclusive tour bus sightseeing concession – even though for years the public and District have been clamoring for this basic human need. These studies must be developed in a transparent and open public process.	D. The National Capital Planning Commission has worked with the National Park Service as a cooperating agency. As stated on pages 544–46 of the *Draft Environmental Impact Statement,* the Park Service has worked and will continue to work with agencies with a presence on or interest in the National Mall. The National Mall plan treats the area as one continuous space. Cooperating agencies participated in several multiday workshops to help develop planning principles, preliminary alternatives, and the preferred alternative, in addition to providing extensive comments during internal reviews of the draft document before its publication. They provided information about their facilities, as well as ongoing and future projects.
E	4. NCPC should direct the Park Service to make certain all project plans conform with the standards developed above as well as any principles that come out of the visionary plan. Why is this important? Because, as we have learned through the ongoing Lincoln Memorial Reflecting Pool project, when contractors have no clear direction, they can only guess as to which choices of water treatment, lighting, and paving materials will be compatible with future development of *other* areas of the Mall. Decisions made now for this and any single project will have far-reaching implications for the entire Mall.	E. The *Visitor Transportation Study,* begun in 2003, is referenced on pages 44 and 47 of the *Draft Environmental Impact Statement,* as well as page 146, and it was established as an element common to every alternative, including the preferred alternative. The *Visitor Transportation Study* was prepared with public input, as required by the National Environmental Policy Act. The "Finding of No Significant Impact" was signed February 5, 2010.
F	5. Finally, NCPC should remind the National Park Service that public consultation needs to be a continuing component of the planning process and not, for example as stated in the Plan on p. 372, limited to consultation with the federal and DC review agencies. Public comments urging the Park Service to give due attention to the Mall's symbolic quality have not yet made it into the Plan.	F. Current NPS projects, such as the Lincoln Memorial Reflecting Pool, are common to every alternative and were addressed as cumulative actions. Plans for these projects were developed to be consistent with the direction being proposed in the National Mall plan.
G	In closing, the NCPC has stated in the past that the Park Service Plan together with NCPC's Framework Plan would constitute the long-term vision for the future of the National Mall. Does this Planning Commission still feel this is true?	G. The National Mall's symbolic quality is addressed extensively in the "Purpose of and Need for the Plan" under the "Foundation for Planning and Management" (DEIS pp. 9–19). It is further discussed on pages 83 and 150 (row 1.2) for the preferred alternative.
H	I am happy to take any questions from Commissioners.	H. Please see letter 6.2 from the National Capital Planning Commission, dated March 18, 2010, which states that the "document will be sufficient for NCPC's use in complying with the National Environmental Policy Act." Both the National Park Service and the National Capital Planning Commission have worked together to ensure coordinated and cohesive plans for the monumental core, including the National Mall.
	For the National Coalition to Save Our Mall: Judy Scott Feldman, Ph.D. Chair and President 9507 Overlea Drive Rockville, MD 20850 301-340-3938 / jfeldman@savethemall.org	

Comment	Letter 19.2. National Coalition to Save Our Mall	Response
	National Coalition to Save Our Mall *Preserving Our Monument to Democracy* *an organized voice for the public on Mall matters* March 18, 2010 Ms. Susan Spain Project Executive, The National Mall Plan National Mall & Memorial Parks 900 Ohio Drive Washington, DC 20024 Dear Ms. Spain: The National Coalition to Save Our Mall, a nonprofit citizens organization and voice for the public on Mall matters seeking long-range, visionary planning for the Mall for the 21st century, welcomes this opportunity to comment on the National Park Service National Mall Plan and Draft Environmental Impact Statement. The Coalition has been a strong supporter of the Park Service's Mall planning efforts and has actively participated since 2006 in the public consultation process. A main interest of the Coalition has been to support and enhance the symbolic quality of the Mall, which has continually evolved from the original concept in the 1791 L'Enfant Plan and the McMillan Plan of 1902 to the present day to meet the changing needs of American democracy and the American public.	
A	In 2005, NPS and representatives of the National Capital Planning Commission and Commission of Fine Arts testified to Congress that they would undertake a new master plan for the Mall. However, the new NPS Plan is not that comprehensive, long-range, visionary plan. It focuses only on NPS lands and interests, not the entire Mall and larger needs of the Smithsonian, National Gallery, Architect of the Capitol, District of Columbia, and the American people who share stewardship of the open space and historic legacy inherited from the L'Enfant and McMillan Plans.	A. The proposed plan is a vision plan for lands on the National Mall under the jurisdiction of the National Park Service, with the exception of land on which the buildings of Smithsonian Institution, the National Gallery of Art, and the U.S. Department of Agriculture are located. However, the plan presents a vision for the entire area that is consistent with the other vision plans for this area, such as the NCPC *Extending the Legacy* (1997) for Washington, D.C., the *Center City Action Agenda* (District of Columbia 2008), the NCPC *Memorials and Museums Master Plan* (2001), and the NCPC *Monumental Core Framework Plan* (2009). The NCPC *Legacy* plan is the successor to earlier plans, such as the L'Enfant and McMillan plans (see DEIS, p. 42), and other plans are all compatible with the *Legacy* plan. The National Park Service considers the National Mall plan to be one of the implementing plans for the *Legacy* plan.
B	The NPS Plan together with the NCPC and CFA Monumental Core Framework Plan, contrary to agency assertions, cannot be considered to constitute the new Mall vision for the 21st century. NCPC's plan looks at areas surrounding the Mall but not the Mall itself. The NPS Preferred Alternative focuses only on NPS lands and basic maintenance and restoration of natural resources. The symbolic quality of the National Mall and its larger cultural value to all Americans is not addressed at all. In our opinion, only an independent National Mall Commission of prominent Americans can rise above the fragmented mentality and status quo thinking that now dominates planning for the National Mall and Washington's Monumental Core.	B. Because the National Park Service has no control over areas beyond its boundaries, the planning team worked closely with cooperating agencies as well as planning offices and agencies to ensure that planning would be coordinated, complementary, and cohesive for the areas covered in the McMillan plan. Regarding the symbolic quality of the National Mall, please see response 19.1G.
C	NPS has been saying that failure to complete this plan has been holding up all maintenance projects and fundraising efforts (Plan, p. 125). But these claims are irrelevant and false. Even before the Mall Plan and Draft EIS were released in December 2009, the NPS had already begun actively planning and implementing major projects including the Tidal Basin seawall repair and the Lincoln Memorial Reflecting Pool rehabilitation project. A Mall Plan was never needed for basic maintenance. Indeed, NPS already has hired consultants to implement turf grass improvements.	C. When this planning effort began, memorial proposals being considered in Congress or proposed by various groups frequently mentioned the need to be on the National Mall. It was clear that the continuation of present conditions would be unsustainable, along with degraded natural resources, aging infrastructure, congestion, and unmet visitor needs. When planning began, there was more than $450 million in deferred maintenance. The proposed National Mall plan includes actions that are vastly more than a maintenance repair plan. Because the National Mall is our nation's primary civic space, a beloved symbol of our country, and a commemorative landscape, with possibly the highest concentration of museums in the world, high use levels will continue and demands on the civic space will be enormous. However, the National Mall is different from most of the world's other great civic spaces, which are most frequently hard-surface plazas and squares that are not as easy to damage. The National Mall is a designed landscape whose primary characteristics include turf and trees, and these natural components require far more care.

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	We would like to make the following observations and recommendations to improve the Plan and Draft EIS and make this document more useful for future planning.	
D	1. The Plan should be given a new title to reflect its NPS-centered, jurisdictional scope and goals, something like A Concept Plan for National Park Service Holdings on the National Mall.	D. Please see response 19.1B.
E	2. Even within the limited scope of a NPS jurisdiction plan, the Plan and Draft EIS should included additional Alternatives to support the interests of the Smithsonian museums, Capitol grounds, White House grounds, National Gallery of Art, USDA, District and the public who share stewardship of this nationally significant symbolic landscape. The Plan cannot simply ignore or dismiss outright without serious discussion, as it does on pp. 125-131, alternatives proposed by the public and other Mall constituencies that do not meet NPS interests. A typical example is the conflict over use of the under-tree areas, with the Smithsonian wanting to use those areas for the Folklife Festival and the NPS banning such use.	E. The planning team has worked closely with cooperating parties in the development of the plan to ensure that their interests were taken into account. For example, please see letters from the Architect of the Capitol (2.1, 2.2), the Smithsonian Institution (7), and the Washington Metropolitan Area Transit Authority (11). Also see response 7B regarding additional study to determine impacts of intensive use under the elm trees on the Mall.
F	3. The Plan and Draft EIS should acknowledge that NPS lands and "cultural landscapes" are part of the larger concept of the National Mall as a unified whole. Because there is no official, statutory definition of the National Mall, NPS should work with other Mall institutions and historians to develop an agreed-upon definition. Key to that definition must be the L'Enfant Plan of 1791 and the McMillan Plan of 1901-2 which are the historic blueprints for the Mall. The Coalition's February 1, 2010 letter to the Advisory Council on Historic Preservation outlines the problems and issues to be resolved.	F. Throughout planning we have recognized that the National Mall is part of a larger whole that was addressed in historic plans. As discussed in NHPA section 106 consultations, an update of the National Mall's nomination to the National Register of Historic Places would be prepared. The programmatic agreement with the Advisory Council on Historic Preservation the D.C. Historic Preservation Office would cover this topic as part of mitigation.
G	4. The Plan should establish design guidelines and principles to ensure unified planning across all NPS lands. NPS should work with other Mall institutions and in the public consultation process to integrate those guidelines into Mall-wide principles for the entire National Mall. All major ongoing projects, including the Lincoln Memorial Reflecting Pool rehabilitation, should be developed within those guidelines.	G. Ongoing projects are compatible with the National Mall plan and the principles outlined in newsletter 2. The principles have been updated and added to the final document as appendix F. These principles formed the basis for plan objectives. Also see table 6 in the *Draft Environmental Impact Statement,* pages 140–45, for how well each alternative meets the plan objectives. The programmatic agreement could address how guidelines would be developed for individual projects.
H	5. Development of the NPS Plan over the past three years has demonstrated the inadequacy and weakness of the NEPA and Section 106 process to produce a Plan that respects the integrity of the National Mall as a unified symbolic landscape. Recent enthusiastic support for the plan by the federal review agencies, U.S. Commission of Fine Arts and National Capital Planning Commission, even before the public comment period is completed and Commissioners have an opportunity to hear what the public is saying about the plan, further proves that the public process is not working as intended. There is no evidence in the Plan or Draft EIS to show NPS ever seriously considered public input and alternatives that do not serve NPS purposes and priorities. This is another reason to rename this plan. And it further points to the need for an independent Mall Commission to prepare a comprehensive, visionary plan for the entire Mall.	H. Please see letter 6.2 from the National Capital Planning Commission, dated March 18, 2010, which states that the "document will be sufficient for NCPC's use in complying with the National Environmental Policy Act." We disagree that "the public process is not working as intended." The NEPA and NHPA section 106 processes are different, as explained during various meetings with consulting parties, which included the National Coalition to Save Our Mall. All groups were asked to present alternatives during the NEPA alternatives development portion of the process. The coalition did not submit any proposals, instead stating that it would use the 106 process. However, the purpose of the 106 process is to identify and to assist in avoiding, minimizing, and mitigating impacts of proposed actions on historic resources, not to develop alternatives. As stated in the *Draft Environmental Impact Statement* (pp. 51, 543–48), public comments were actively solicited throughout the planning process to develop the preliminary range of alternatives, as well as the preferred alternative. The preferred alternative includes at least eight ideas from each alternative presented in newsletter 3.
	In our further comments we explain these main points. We make recommendations to make this document useful for any future planning for the National Mall.	
	National Coalition to Save Our Mall P. O. Box 4709 Rockville, MD 20849 301-340-3938 jfeldman@savethemall.org www.savethemall.org	

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
I	**1. The title should be changed to reflect its NPS-centric focus and conceptual character**	I. Please see response 19.1B.
J	What would a National Mall Plan worthy of that title look like? The National Mall is our country's most symbolic landscape and civic space at the center of American democracy, the legacy of two historic plans, the L'Enfant and McMillan Plans. A truly comprehensive, long-range, visionary "National Mall Plan" would require a multi-jurisdictional and multi-disciplinary effort, involving all constituencies including the Architect of the Capitol, White House, Smithsonian, District residents, and others. Such a plan would include a physical master plan, design principles, a landscape plan, a circulation plan, and clear sustainability goals and practices to support unified, coherent development across the entire Mall. A National Mall master plan would address urgent problems and needs including new locations for future museums such as the Latino American Museum, which is currently seeking a location "on the Mall"; low-cost circulation the public, District officials, and business interests have been clamoring for for years; and a flood plan to address problems associated with large portions of the Mall being on landfill and in the 100 year flood plain and worsening conditions due to climate change. It would anticipate long-range future needs by building upon on the historic plans to meet modern needs and anticipate long-range needs of the American public, including expansion areas to provide for the inevitable growth of public activities well into the future.	J. As previously stated, multiple planning efforts have been coordinated with various agencies and commissions, and those efforts have addressed your comments. These include NCPC's *Extending the Legacy* (the overall vision plan), the *Memorials and Museums Master Plan,* the *Monumental Core Framework Plan,* the D.C. *City Center Action Agenda,* the NPS *Visitor Transportation Study,* and the Potomac Park levee, as well as the proposed National Mall plan.
K	A jurisdiction plan, not a Mall master plan This Plan, instead, is NPS-centric; focuses only on NPS portions of the Mall; is concept-based instead of a physical master plan; maintenance focused; and emphasizes improvements to the status quo but not long-range future concerns. NPS has chosen to place its attention on NPS lands and on important practical matters such as improving the turf grass, repairing crumbling pathways and monuments, and upgrading visitor services. This is understandable given strong reaction in Congress and the national media to the Mall's deplorable, run-down physical condition of the open space under NPS stewardship. We also understand from NPS spokesmen that completing this jurisdiction Plan will allow NPS to move forward to develop these concepts into real projects as soon as possible.	K. We disagree that the National Mall plan is a jurisdiction plan with limited purpose and a maintenance focus. Also, please see response 14.2J.
L	A concept plan, not a decision-making document This Plan is essentially a wish-list of "written concepts" of goals and discrete projects – improvements to turf grass, visitor services at Constitution Gardens, Union Square, and the Washington Monument, as well as rehabilitation of memorials. These individual projects only will be further developed into actual designs, involving separate NEPA and Section 106 public consultations, when Park Service and private funding becomes available. Many of these projects are good ideas – improve the grass, repair monuments and walkways. Other are more troubling, such as hard paving the gravel walkways and new large plazas, and introducing numerous kiosks, restaurants, restroom facilities, and visitor centers on the open space that could have dramatic and adverse impacts on the historic quality and landscape character of the National Mall. (We do not understand how NPS justifies the addition of two new visitors in the face of the 2003	L. The approved National Mall plan will function as an overarching decision-making document. The National Park Service uses a tiered approach to planning, as described during various meetings with consulting parties, with broad vision-oriented documents followed by design and construction documents (see DEIS, pp. iii and 3–4). The approved National Mall plan will be the top level NPS document, and we consider this plan to be an implementation plan for the NCPC *Legacy* plan, which addresses the broader vision for Washington, D.C., and is the successor to earlier plans, such as the McMillan and L'Enfant plans. The National Park Service proposes visitor contact facilities, not visitor centers.

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response

Congressional moratorium on visitor centers on the Mall.) The next steps of design development will be critical. These concepts must be fully and publicly vetted and scientifically evaluated within the larger context of the entire Mall, and any necessary changes or revisions made, before moving forward to final review agency approval.

M

Need to incorporate a Mall circulation plan

As NPS planning directives point out, circulation planning is a critical planning tool. Identifying a variety of transit and circulation options, from interpretive sightseeing service to basic low-cost shuttle, and establishing a network of routes to, across, and around the Mall's two-mile length will also determine pedestrian patterns and appropriate locations for visitor service such as food, restrooms, parking, and so on. The NPS sightseeing bus service proposed in the NPS Plan and Draft EIS is not adequate. We are alarmed to see the February 2010 Finding of No Significant Impact decision by NPS rejects any low-cost option and instead chooses only an expanded tourmobile-type sightseeing service. It is not enough for NPS to simply coordinate with District planners, Metro, and Circulator to allow those low-cost options around the Mall periphery. Visitors have been demanding for years those kind of options on the Mall itself. NPS should immediately open a public discussion about additional alternatives for Mall circulation including on the Mall's inner streets, Madison and Jefferson Drives. This should be a priority.

M. The 2006 *Visitor Transportation Study* discussed various circulation options for the National Mall, and the *Draft National Mall Plan / Environmental Impact Statement* stated that all alternatives would be consistent with the proposed transportation service (DEIS, p. 47). The cumulative impact analysis under "Environmental Consequences: Access and Circulation" further explained the interrelationships between the two documents (see DEIS, pp. 448–49). Circulation maps were prepared to show interrelationships between the National Mall and the District of Columbia. We believe this analysis is adequate.

The "Access and Circulation" section of "Environmental Consequences" (DEIS, pp. 441–67) includes ideas, suggestions, recommendations, and revisions based on comments from the Washington Metropolitan Area Transit Authority, the D.C. Department of Transportation, the D.C. Office of Planning, the National Capital Planning Commission, and the U.S. Commission of Fine Arts. This section discusses cumulative circulation projects by others, as well as transportation goals and policies within Washington, D.C., (DEIS, p. 442) and relevant NPS policies (p. 443). Some minor revisions of text have been made based on WMATA comments on the *Draft Environmental Impact Statement* (see letter 11).

2. Expand Alternatives studied to include the interests of other Mall stakeholders

N

The Plan and Draft EIS show no evidence that comments and alternatives proposed by the Smithsonian and other Mall institutions, or by the public, during countless hours of consultation meetings, were taken seriously. On the contrary, the NPS Preferred Alternative and its almost exclusively NPS-centric focus, is little changed from the proposals first advanced by the NPS in 2007. The National Coalition to Save Our Mall repeatedly requested that consideration be given to solutions that preserve, restore, and build upon the historic legacy of the L'Enfant and McMillan Plans, to no avail. However, the historic legacy must be respected. And the Mall's larger context as a cherished place the American public experiences as a unified whole requires consideration of additional alternatives. Only once those alternatives are identified and evaluated with data and scientific analysis against the NPS Preferred Alternative can this be considered a decision-making document. Such alternatives include the following:

N. The *Draft Environmental Impact Statement* was prepared with extensive involvement by agencies and the public (see pp. 543–48). As stated throughout the document, the preferred alternative builds on the historic legacy of the L'Enfant and McMillan plans. As noted on the inside front cover of the draft document, nearly 30,000 Americans and others provided ideas, statements of concern, and helpful comments. All of these comments were taken into consideration as alternatives were developed and refined and the environmental impacts analyzed.

O

UNION SQUARE

There is near universal agreement that this pool is a failure and a barrier that needs to be redesigned while also protecting its modern role as popular, highly symbolic site for First Amendment demonstrations. We are concerned about NPS intentions to turn this critical parcel of the Mall at the intersection of Capitol grounds and greensward to the west into a lively urban space, a concept at odds with the historic plans. Consideration should be given to an alternative based in the McMillan Plan concept, which would call for smaller water elements and more paved plaza without however changing this areas quality as an integral component of the overall Mall landscape.

O. As stated in the *Draft Environmental Impact Statement* on pages 88 and 194 (row 10.2), the vision for Union Square would fulfill the McMillan plan purpose to connect the U.S. Capitol grounds and the Mall.

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Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
P	NPS National Mall Plan Comments by the National Coalition to Save Our Mall March 18, 2010 Page 5 Another alternative is to coordinate with the Architect of the Capitol and Botanic Garden to move any new restroom or visitor service structure off the central Mall vista to the side panels. The Coalition believes that consideration should be given to transferring jurisdiction for this panel from NPS back to the AOC. This would allow AOC, which includes this parcel in its own master plan for the Capitol grounds, to design a unified ensemble between 1st and 3rd Streets and Pennsylvania and Maryland Avenues. The Botanic Garden could apply the principles now being established with its Sustainable Landscape Initiative here, making this prominent Mall focal area a model of forward-looking sustainable planning.	P. Please see letter 2.2 from the Architect of the Capitol.
Q	THE MALL Instead of replacing the gravel pathways with hard paving, and adding large new plazas at 12th Street and elsewhere, sustainable alternatives and permeable surfaces should be considered. These alternatives could be developed in consultation with the Botanic Garden and ASLA Sustainable Landscape Initiative as well as other experts. NPS favors solutions that give preference to natural resources over public use, and has instituted a ban on public events under the elm trees. Additional alternatives could include a plan to retrofit the under-tree areas to accommodate public use that has grown in recent decades and will continue to grow in the future. New sustainable techniques using permeable paving, and used successfully for centuries in Europe and in many urban parks in the United States, would allow the trees to be used as intended, as shade trees for human protection and comfort, while also creating new kinds of spaces to accommodate the Mall's evolving role for cultural and educational activities on the open space. The Smithsonian depends on this kind of alternative in order to carry out its educational and cultural role on the Mall.	Q. The National Mall plan supports the Sustainable Sites Initiatives™. However, like different design solutions responding to the same criteria, there are many different ways to achieve sustainability. On the Mall the plan recommends capturing, storing, and reusing rainwater for irrigation. For a discussion about permeable paving, see response 8D to the U.S. Commission of Fine Arts and the discussion of gravel walkways under "Summary of Comments and Responses" beginning on page 12. As discussed in the *Draft Environmental Impact Statement* on pages 128–29, proposals to remove grass under elms were rejected for a number of reasons.
R	Additional alternatives for restroom and food facilities could be developed through inter-agency collaboration. Instead of the Preferred Alternative that locates these structures on the open space, they could be located to the sides, in or near existing buildings. For years there has been talk of a single National Mall Welcome Center inside the Smithsonian's centrally located Arts & Industries Building. That alternative would minimize adverse impacts on the Mall's open space.	R. As stated in the *Draft Environmental Impact Statement* on pages 90 and 210 (row 11.7), the National Park Service would work with the National Gallery of Art and the Smithsonian Institution to improve access to existing and proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information. With regard to the Arts and Industries Building, the National Museum of the American Latino Commission has requested that no actions be taken at this building until a site has been selected for that museum (see DEIS, p. 44). For another idea suggested by the D.C. Preservation League, see 14.2H.
S	WASHINGTON MONUMENT This area now slated for three major construction projects – the 17th Street flood levee, the Smithsonian African American Museum, and redevelopment of the Sylvan Theater site with a multi-purpose structure – lacks a master plan. Rather than accept the status quo and turn the 2003 security plan into the master plan, additional alternatives are needed to put these three projects into a larger, unified design whole. The concept of a continuous Mall shaded promenade was never realized here, and is not part of the 2003 plan, but should be a focus for creating a welcoming human environment.	S. The park has an approved *Development Concept Plan* for the Washington Monument grounds, and that is the plan that will be implemented. As requested by the National Capital Planning Commission, the approved Olin landscape plan for the Washington Monument grounds would be updated and implemented to take into account ongoing and proposed projects (the Sylvan Theater area, the National Museum of African American History and Culture, and the Potomac Park levee). Text has been added about the Olin landscape plan on pages 29, 91, and 210 (row 13.1).
T	One alternative would be to reevaluate the McMillan concept for what the 1902 plan considered the centerpiece of the Mall design and "gem of the Mall system" or consider other design alternatives that achieved that important design goal for the Mall as a whole. Within that larger context, the location and purpose of any Sylvan Theater redevelopment should be fully reconsidered. Is that site, chosen in 1917 for an outdoor theater but now next to heavily trafficked roads and off main pedestrian routes or low-cost transit, still the best location for a visitor center,	T. There are shaded opportunities to walk along both Independence and Constitution avenues.
U		U. A visitor center is not being proposed. See the definitions of 'visitor center' and 'visitor facilities' on page 584 of the *Draft Environmental Impact Statement,* as well as the discussion of a central visitor center on page 130 and the discussion of visitor facilities in appendix D (pp. 571–75). Regarding the Sylvan Theater location, it was the general consensus at the NHPA section 106 consultation meeting on April 12, 2009, that visitor facilities would be appropriate in this area. Visitor use patterns were considered in selecting this site, and changes in use patterns are anticipated.

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	 performance space, restrooms and so on? Probably not. With completion of the African American Museum in 2013, pedestrian movement will shift to the north. The Plan needs to consider the additional alternatives that anticipate future pedestrian use patterns.	
V	LINCOLN MEMORIAL/ WEST POTOMAC PARK As stated above, the ongoing Lincoln Memorial Reflecting Pool rehabilitation project needs to be considered within the larger Mall context, including decisions about paving materials, lighting, and park furniture. NPS proposes locating a new water pumping and filtration structure (24 x 60 feet) next to the jumble of buildings and stables south of the Pool. However, the Coalition	V. The concepts for the Lincoln Memorial Reflecting Pool are compatible with the National Mall plan.
W	believes NPS should first consider a different alternative: relocate the stables, which are old and unsightly and draw cars and trucks onto the open space, more to the west or other areas, in order to open up the vista and open space from the Pool toward the forthcoming MLK Memorial, Tidal Basin, and Potomac River. A different location should be found for the large, visually intrusive, and potentially noisy pumping structure.	W. The relocation of the stables was not considered in the planning process because a decision on maintaining the current location had already been made (letter of August 24, 2006, and accompanying report from Secretary of the Interior Dirk Kempthorne to Chairman Pete Domenici, Committee on Energy and Natural Resources, United States Senate). The horse patrols are part of an immediate response crowd control measure, and they are available to respond to spontaneous incidents, provide security and response for the White House, and provide immediate supplemental law enforcement. The plan proposes to reduce the impact of United States Park Police operations (parking and access) on visitors while increasing education about horse patrols and the Park Police. Facilities would be replaced with those of a more appropriate character. Because this issue has already been addressed, it was not included in the considered but dismissed topics.
	In addition to these highlights, the Coalition believes that all aspects of the Preferred Alternative will benefit from this kind of broader contextual thinking that includes the interests of all Mall stakeholders and recognition of the historic plans that must be respected in any planning effort.	
	3. Identify the cultural resources as integral parts of the larger National Mall and the historic L'Enfant and McMillan Plans	
	A problem that arises time and time again for National Mall plans and projects is the confusing and inconsistent way the federal government defines the National Mall. This issue has particular significance for this NPS Plan and must be resolved before actions are taken based on the Plan that could destroy the essential unity of the Mall as a designed symbolic landscape.	
X	Jurisdiction-based definitions A fundamental flaw of the Plan as a useful planning document is its failure to acknowledge the unique quality of the Mall and its roots in the L'Enfant and McMillan Plans. Instead, the NPS Plan treats the Mall lands as parcels within a larger NPS administrative unit called National Mall & Memorial Parks whose "memorial parks" include Dupont Circle and Farragut Square park.	X. The plan is built on the L'Enfant and McMillan plans, and the preservation of the overarching visions of these plans is fundamental to the proposed National Mall plan. This has been acknowledged in newsletters, background papers that were posted on the plan website (www.nps.gov/nationalmallplan), public meetings and presentations, as well as the *Draft Environmental Impact Statement* (for example, see pp. 10, 11, 14, 21, 28, 42, 72, 83, 150, 251–59). Nevertheless, change on the National Mall is a constant and despite landmark plans for Washington, D.C., it was clear by the beginning of the 21st century that the National Mall was never designed for present levels of civic use, tourism, recreation, and cultural activities.
Y	The foundation of this jurisdiction-based thinking is the Foundation Statement itself. This basic planning document identifies the "park" and its "purpose" not as the National Mall but as "National Mall & Memorial Parks," which is an administrative unit of the Park Service encompassing central Washington within which the Mall cultural landscape units are only a part. Instead of recognizing the Mall's purpose as civic stage and symbol of American identity, the Statement identifies the purpose as to *manage* these lands.	Y. The National Coalition to Save Our Mall appears to be confusing different portions of the foundational elements for the National Mall plan. The elements that pertain specifically to the National Mall are described in the *Draft Environmental Impact Statement* beginning on page 9. These statements were developed at a Foundation Workshop for the National Mall and Memorial Parks (which, as you state, is the NPS administrative entity responsible for the National Mall), but they focus specifically on the National Mall. As explained on page 9, the overarching statements that pertain to the National Mall and Memorial Parks are presented in appendix A. The significance statements on page 10 articulate the importance of the National Mall as a civic stage and symbol of American identity. The statements of purpose and significance are integral to the foundation statement for the National Mall.
Z	This NPS Plan further subdivides these NPS parcels into separate, NPS-designated "cultural landscapes" – The Mall, Washington Monument, Union Square, and so on. Based on this	Z. The National Mall has evolved since 1791, and the construction of memorials to commemorate heroes and significant events has occurred at different points in time to honor and recognize the history of our nation. This has resulted in individual historic landscapes. The National Park Service has proposed updating the National Mall nomination form for the National Register of Historic Places to include the entire area of the National Mall. The programmatic agreement with the Advisory Council on Historic Preservation and the D.C. Historic Preservation Office would cover this topic as part of mitigation.

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
	 segmented approach, the NPS Plan proposes improvements based on each area's individual history and character, not its larger context within the National Mall as a whole. The Plan's goal to use "best practices" from other urban parks reinforces a generic approach that treats the Mall as one park within a larger NPS administrative unit that includes all central Washington. But the Mall is a unique symbolic landscape and solutions should represent the most innovative and forward-looking solutions, not generic treatments. This jurisdiction plan will only be useful as a Mall planning document once it is folded into the larger visionary plan for the entire Mall. Inconsistencies in defining the National Mall The astonishing fact is, as the Congressional Research Service found in 2003, there is no statutory definition of the Mall. Equally surprising, the Mall has never been officially recognized a National Historic Landmark. This basic need must be resolved as part of the completion of the Plan.	
aa	The NPS does not even have a consistent way to define the National Mall. The maps showing the "National Mall" planning area includes a large area from 1st Street to the Lincoln Memorial, and from Constitution Avenue to the Jefferson Memorial. However, the NPS elsewhere defines the National Mall in two other ways: the National Register Nomination defines the western boundary to be 14th Street, and so not to include the Washington Monument and Lincoln Memorial; the Historic Districts map shows the Mall boundary at 15th Street. Which of these three different definitions is right? The first step in any planning effort is to accurately identify the resource and its purpose, so this must be clarified.	aa. It is true there are inconsistencies in how the National Mall is defined in nominations to the National Register of Historic Places. That is why nominations are updated periodically. The National Mall Historic District actually described the area that the McMillan plan and the National Park Service refer to as the 'Mall.' The title of the nomination form is the only location where the term 'National Mall' is used. Also see response Z to your letter. Also, please note that an error on the National Register Historic Districts and Properties map (DEIS, p. 261) has been corrected to show that the boundary between the Mall and the Washington Monument grounds is 14th Street, not 15th Street.
	NEPA and Section 106 leave definitions to federal agencies We understand that the NEPA and Section 106 processes give authority to the federal agency undertaking a plan to determine how the resource is described, and NPS identifies the planning areas according National Register nominations for individual "cultural landscapes" such as The Mall, Union Square, Washington Monument. However, the Coalition strongly believes that these separate parcels must be further integrated into the historic concept of the National Mall as a whole. We will not support an approach that treats the Mall as a collection of park units within a larger central Washington NPS administrative district and fails to recognize its unity as a unified designed landscape. That approach denies the very value of the Mall as the symbolic core of our national capital.	
bb		bb. Please see responses Z and aa to your letter.
	National Coalition to Save Our Mall seeks resolution of the Mall definition problem On February 1, 2010, the Coalition sent a letter and historical analysis to the Advisory Council on Historic Preservation asking this White House office to take a lead in resolving this problem. As we state in our letter, the Coalition believes that this complicated task of reconciling the historic L'Enfant and McMillan Plans with subsequent planning studies needs to engage independent historians able to objectively evaluate the applicability of National Register principles and NPS jurisdictional thinking to the National Mall.	
cc		cc. The intent of the proposed plan is to comprehensively address all areas of the National Mall. There have been and will continue to be numerous studies by historians and others about the development of central Washington, D.C.

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response
dd	In recent weeks, and in response to the Coalition's letter, NPS has acknowledged inconsistencies in how NPS-produced studies define the Mall and the various cultural landscapes within it, and stated the intention to revise the relevant National Register documents and to potentially nominate the National Mall to National Historic Landmark status. Because the problem is vast with major implications for all Mall planning efforts, we believe the Landmark process should begin immediately. It could start with a narrower focus directly related to the African American Museum location, which was the subject of our February letter, by landmarking the Washington Monument grounds.	dd. Please see responses Z and aa to your letter.
	4. Establish design guidelines and principles that apply to all Mall projects	
ee	Design principles and guidelines need to be developed and coordinated among other Mall institutions to ensure unified, coherent development on NPS lands and throughout the National Mall. Ongoing projects such as the Lincoln Memorial Reflecting Pool rehabilitation that have the potential to dramatically alter the historic Mall landscape and establish precedents that could have	ee. Planning and design principles, which were developed with cooperating agencies and printed in newsletter 2, have been updated and added to the *Final Environmental Impact Statement* as appendix F. Many of these principles were also addressed in the plan objectives (DEIS, pp. 4, 7–8, and Table 6, pp. 140–45). The programmatic agreement could address how
ff	significant impacts on future Mall-wide improvements to pathways, lighting, water treatment must not be separated out from the Plan. Steps should be taken immediately to make any decision-making regarding elements that have large implications for the Mall as a whole into a broader, inter-agency and public discussion about Mall-wide standards and guidelines.	guidelines would be developed for individual projects. ff. There is a separate history of development and cultural landscape information for a variety of areas on the National Mall, including the Lincoln Memorial grounds, which was taken into account for the reflecting pool project. Those proposals are consistent with the National Mall plan. Also see response ee to your letter.
	Statements by NPS planners and the National Capital Planning Commission that the Lincoln Memorial landscape and Pool are "separate" landscapes from the rest of the Mall and should be treated without consideration of a larger Mall-wide context are misguided. As noted above, these opinions, rooted in a piecemeal, segmented approach to planning that divides the National Mall into separate, unrelated "cultural landscapes," denies the overall unity of the Mall as a symbolic whole and legacy of the historic L'Enfant and McMillan Plans.	
gg	As we have learned through the ongoing Lincoln Memorial Reflecting Pool project, moving forward on a major design program before completing a physical master plan or developing Mall-wide principles to guide development leads to piecemeal growth with potentially damaging effects on the Mall's larger unity. When the contractors have no clear direction, they can only guess as to which choices of water treatment, lighting, and paving materials will be compatible with future development of *other* areas of the Mall.	gg. On projects such as the Lincoln Memorial Reflecting Pool, the National Park Service defines the project, program, and parameters, and approves all final design, with input from consulting parties and review or approval by the D.C. Historic Preservation Office, the Commission of Fine Arts, and the National Capital Planning Commission. Contractors are thoroughly briefed about the history of the project, background information, and constraints. All contractors are also briefed about the National Mall plan.
	5. NEPA and 106 are inadequate for planning the National Mall	
hh	Having participated actively in the planning process since 2006, the National Coalition to Save Our Mall has serious concerns that the conventional NEPA and Section 106 process is not an appropriate process for planning for the National Mall. The Mall is not a typical National Register property. It is not simply a collection of unrelated parts, but that is how the process treats it. The Mall is not a typical historic resource but an ever-evolving symbol.	hh. We agree that the National Mall is not a collection of unrelated parts. Planning objectives, the purpose and significance statements, and the vision emphasis (DEIS, pp. 67 and 150 [row 1.2]) look at the entire National Mall and recognize that its historical significance continues to evolve.

Comment	Letter 19.2. National Coalition to Save Our Mall (cont.)	Response

Nonprofit consulting parties raised concerns that this "National Mall Plan" was not rising to the necessary level during public meetings as well as in two joint letters in 2008; those groups included the National Trust for Historic Preservation, the National Parks Conservation Association, the DC Preservation League, the Committee of 100 on the Federal City, and National Association for Olmsted Parks, and the National Coalition to Save Our Mall. (Those letters can be read at http://www.savethemall.org.) Project review agencies reminded us that the NEPA and Section 106 laws give NPS the authority to define the project as it sees fit so long as other agencies agree. The NCPC and DC Historic Preservation Office concurred with NPS decisions.

In essence, the evolving quality of the Mall is not even valued by the NEPA and Section 106 process by which this Mall Plan has been developed. This makes it almost impossible for the Coalition and other consulting parties to comment on the Plan and Draft EIS in a way that NPS and other federal and District review agencies take seriously. We wonder if there is any way to reconcile this dichotomy between National Register-based planning and L'Enfant and McMillan Plan-based planning without establishing a special approach appropriate to the unique quality of the National Mall.

ii

The Coalition feels that we have spent much time and effort in taking seriously the public consultation component of the NEPA and Section 106 process only to have our well-thought-out ideas and alternatives dismissed outright without comment in either the Plan nor the Draft EIS. During the course of the planning process since 2006, the Coalition published two reports that include some of these ideas: *Rethinking the National Mall* in 2008, and *Renewing American Democracy on the 3rd Century Mall* in 2009. So far as we can tell, none of these ideas has made its way into the NPS Plan or the Alternatives considered. If NPS does not accept these ideas legitimate, then it should state why. A meaningful public process must be put in place and followed.

jj

The National Coalition to Save Our Mall looks forward to seeing our comments and concerns addressed in future public consultation meetings and in the final Plan and EIS.

Sincerely,

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ii. Some of the ideas expressed have been included, such as respect for and emphasis on historic plans, the importance of the civic stage, improved opportunities for the public, and the need for the National Mall to evolve. Other ideas were dismissed after they were thoughtfully considered (see DEIS, pp. 125–31).

jj. The National Mall plays a vital role in our nation's history, culture, and expression of rights. An inclusive and meaningful public nationwide participation process has taken place throughout this planning effort. We have received around 30,000 comments from all areas of the country. These comments were in three reports for newsletters 1 (scoping), 3 (preliminary range of alternatives), and 4 (preliminary preferred alternative). Scoping comments were also summarized in newsletter 2. Each newsletter also identified the next steps in the planning process and how people could submit comments.

Throughout the planning effort, meetings were held with cooperating agencies regarding the NEPA planning process and with consulting parties regarding the NHPA section 106 process. These meetings were specifically kept separate to avoid a perception that some groups might have more influence than general citizens. Frequently local groups may feel that their comments are more valuable than those from people who may be less familiar with a park, whether it is a national park like Yellowstone or the National Mall. The National Park Service considers all public comments equally, and comments that we received about the National Mall are reflected in the range of alternatives considered in the *Draft Environmental Impact Statement,* including the preferred alternative. Public comments were also used to identify issues where greater public understanding is needed related to policy, legal mandates and constraints, and values that affect decision making (see "Purpose of and Need for the Plan: Scope of this Document — Environmental Impact Topics" and the methodologies for impact analysis under each topic in the "Environmental Consequences"). The public involvement process used throughout this planning effort is described in detail in the *Draft Environmental Impact Statement* under "Consultation and Coordination" (pp. 543–48).

During the NHPA section 106 consultations, NPS representatives repeatedly explained the dual roles of the NEPA and NHPA processes and the best way to participate. Groups were requested to present alternatives and ideas during the NEPA scoping and alternatives development portion of the process. The reports mentioned where apparently developed independently of the process that was outlined in each of the newsletters and in public meetings. The role of the section 106 process is to identify and mitigate impacts to historic resources of proposed actions, not to develop alternatives.

Comment	Letter 20. National Parks Conservation Association	Response
A	March 18, 2010 Ms. Susan Spain, Project Executive National Mall & Memorial Parks National Park Service 900 Ohio Drive SW Washington, DC 20024-2000 Dear Ms. Spain: Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the National Mall. I am writing on behalf of the nonpartisan National Parks Conservation Association (NPCA) and its more than 320,000 members. NPCA is a nonprofit advocacy group dedicated to protecting and enhancing America's national parks for our children and grandchildren. NPCA has served as a consulting party during the Section 106 process regarding development of this plan, as well as related but separately-developed plans for projects on the Mall such as the Lincoln Reflecting Pool. NPCA acknowledges that the Draft EIS for the National Mall is broadly written and meant to serve "as an overarching organizational document for subsequent project implementation." We are, nonetheless, concerned that the Draft EIS does not provide enough information about the location, nature, and impact of proposed construction and redesign projects that could fundamentally alter the physical characteristics and symbolic nature of the National Mall, America's civic stage for our democracy. The Draft EIS states that future implementation plans will "include standard procedures for site-specific design,"[1] including review by historic preservation consultants, the public, and relevant commissions. A separate summary of major concepts provides some specificity regarding the redesign of the National mall, including a listing of new, removed, expanded, or replaced facilities, and plans for turf rehabilitation and management. Still, this approach presents several challenges. By engaging in a process that furnishes specifics about restoration, rehabilitation, and construction projects only as each individually comes on line, the National Park Service (NPS) is fragmenting planning and failing to consider the holistic nature and needs of the National Mall. Second, despite the fact that the Draft EIS states that the "Impacts of the alternatives are analyzed in accordance with the guidelines of the Council on Environmental Quality (CEQ) for implementing the National Environmental Policy Act (40 CFR Part 1500) and the National Historic Preservation Act,"[2] the document does not contain sufficient detail about proposed development or redesign to provide consulting parties and other members of the public with the ability to give meaningful feedback on the plan. Some specific examples highlighting our concerns include: [1] National Park Service Draft National Mall Plan/Environmental Impact Statement, 2009, 3 [2] 357 1 | Page	A. NPS vision plans, such as general management plans and the proposed National Mall plan, generally do not provide prescriptive details about how each proposed action should be implemented. The comments we have received on the *Draft Environmental Impact Statement* range from those stating that the proposed plan is too prescriptive to those saying there is not enough detail. For example, the D.C. Historic Preservation Office (letter 4) thought there was too much detail for some areas. The goal of the plan is to provide sufficient guidance for future design teams without being too prescriptive. As stated in the *Draft Environmental Impact Statement* on pages iii and 3–4, subsequent design and construction documents will be prepared to detail how to achieve the plan objectives. This process will generally include standard procedures for site-specific design, commission reviews, public engagement, and historic preservation consultation.

Comment	Letter 20. National Parks Conservation Association (cont.)	Response
	Regarding cultural resources	
B	• The Draft EIS states the "health and appearance of the historic landscape [of the National Mall] would be improved," but provides few details as to how this will be accomplished. The summary of major concepts states that five to seven facilities will be added to the National Mall, four removed, and nine replaced or revised. While the need to add, revise, or remove these structures may be valid, the Draft EIS does not provide sufficient context to enable consulting parties and the public to understand the visual impacts of such redesign and development, nor its relationship to the Mall narrative. No specific information is provided as to how big the new structures will be, where they will be placed, or whether alternative locations adjacent to the National Mall have been considered.	B. Page 84 in the *Draft Environmental Impact Statement* describes how natural resource conditions for the historic landscape would be improved; also see row 3.4 on page 156.
C	The section on Union Square suggests that the Ulysses S. Grant Memorial "would be restored," but does not discuss how plans to reduce the size of the reflecting pool, and add a performance space, food service stands, equipment rental kiosks, interactive water features, and rest rooms would affect the area except to conclude that the "impacts on Union Square would be long-term, minor to major, and adverse."[3] Key questions relating the proposed development and redesign of Union Square include:	C. Please see response A to your letter regarding subsequent design and construction documents.
D	○ Have NPS and the Architect of the Capitol jointly considered whether the land immediately north of Union Square owned by the Architect could play a useful role in the redesign of Union Square, and if so, what alternatives have been discussed?	D. Please see letters 2.1 and 2.2 from the Architect of the Capitol.
E	○ Should the areas immediately north and south of Union Square be deemed to be off-limits to development, what measures will NPS take to ensure that the redesign of Union Square and the construction of new visitor facilities have a minimal impact on the historic landscape and sightlines involving this portion of the National Mall?	E. We agree that these areas need to be treated holistically.
F	The Draft EIS is equally vague regarding the impact on the historic landscape of redesigns proposed for other areas of the Mall. Plans for the Washington Monument and its grounds call for the construction of a multi-use facility at the northwest corner of 15th Street and Independence Avenue that would replace both the temporary visitor services tent and the Sylvan Theater. The new facility would provide food services, house interpretive displays, and restrooms, and would accommodate audiences of up to 3,000 people. Construction of such a facility is bound to have impacts on the historic landscape of the National Mall but the Draft EIS is silent on the matter except to say that the facility will "be a pleasant destination... constructed below the level of roads and oriented to muffle noise and provide views of the monument," and that the redesign would "provide long-term, minor, beneficial impact."[4]	F. The Sylvan Theater area was selected for visitor services because of its physical location in a lowered dell outside vistas and view corridors and its proximity to major walks and tour bus parking. Specific impacts of a new facility would be analyzed during the preparation of subsequent design and construction documents (see response A to your letter). On page 371 of the *Draft Environmental Impact Statement* under "Environmental Consequences: Cultural Resources — Impacts Common to All Alternatives," we state that "the actions described are conceptual in nature and their effect on the historic character of contributing features cannot be definitively stated. The impacts are referred to as potential effects."
G	A new "flexible performance space" is planned for the eastern end of Constitution Gardens. The "gazebo" or "stage" would take advantage of the existing terrain to "accommodate an audience of several thousand." The Draft EIS states that utilities (sound system and amplifiers) would be provided but that noise from events at this new performance space would be mitigated to preserve the ambience at nearby memorials. Unfortunately, the document does not contain any information regarding how NPS would prevent audio and visual intrusions from disturbing	G. Measures to prevent audio and visual intrusions at nearby memorials from activities at Constitution Gardens would be determined during the subsequent design and construction process. Those projects would be guided by the criteria included in the approved National Mall plan.
	[3] 377 [4] 378	
	2 | Page	

visitors at the World War II Memorial (one tenth of a mile distant) or at the Vietnam Veterans Memorial (a little less than a half-mile away).

The Draft EIS also mentions the intention of NPS to install barriers in "various places" to reduce pedestrian trampling of sensitive areas and allow for recovery. The document states such measures would result in "long-term, moderate, beneficial impacts to soil resources," but fails to address what the barriers would look like, where they would be placed, and the impact on the historic landscape of having additional bollards, fencing, and/or concrete barriers placed on the 162 acres of turf currently maintained by NPS on the National Mall.[5]

H

Demonstrations, special events, and national celebrations

The complexity of balancing use and preservation comes into focus as one reflects on the more than 20 million people who annually visit the National Mall. Clearly, First Amendment demonstrations, as well as special and recurring events such as presidential inaugurations, the Fourth of July, and the Folk Life Festival, are a part of our national culture and will continue in the future. Just as clearly, these events have adverse impacts on the Mall and degrade the resource for visitors who arrive a day, week, or month after a special event has taken place. Inevitable wear and tear must be managed so that the expectation that the National Mall should be an inspirational, attractive, and well-maintained symbol of our American democracy, can be met.

- NPS proposes a number of seemingly reasonable steps to reduce the damage done by large events, while still allowing those events to take place. Have the past sponsors of large events also proposed additional steps that could be taken to reduce such damage from occurring?

I

- The Draft EIS states that "permanent infrastructure and space would be planned for temporary facilities (such as portable restrooms, trash, recycling, logistical or operational space, media activities, access, and law enforcement)." The document then notes that "narrow strips of turf along 3rd, 4th, 7th, and 14th streets would be removed and paved to accommodate event facilities." While having hardened surfaces for event support would save wear and tear on the fragile turf, the Draft EIS is silent on a number of key questions including:
  - What would be the visual and other impacts of such a redesign?

J

  - How will the placement of logistical staging areas along major, and already crowded, north/south pedestrian corridors impact pedestrian circulation and access?

K

  - Will such hardened areas reduce the space available for pedestrians and cyclists, and if so, how will pedestrians and cyclists be accommodated?

L

  - How will this fit with other elements of the Mall plan that call widening sidewalks and pathways?
  - Are there locations off the Mall, on adjacent lands, where staging areas might be provided?

M

[5] 300

H. Every project on the National Mall is extensively reviewed by the U.S. Commission of Fine Arts, the National Capital Planning Commission, the D.C. Historic Preservation Office, and the Advisory Council on Historic Preservation. Most projects are also subject to the consultation process under NHPA section 106. The purpose of the consultations is to ensure that impacts to historic resources are identified and mitigated.

I. We believe that sponsors of events or permitted activities can take more actions to reduce impacts, and the National Park Service has been encouraging them to do so.

J. Visual impacts would be improved by removing generators and items like cable protection devices. Much civic infrastructure would be invisible belowground. Most proposed locations are frequently used already.

K. Pedestrian routes would always need to remain open, and some north-south walks would be widened to ensure that pedestrian and bicycling uses were accommodated.

L. The total size of hardened areas would need to be addressed in design and through discussions with the U.S. Commission of Fine Arts and the National Capital Planning Commission, as well as consultations with the D.C. Historic Preservation Office, the Advisory Council on Historic Preservation, and consulting parties. There may be trade-offs in widths of walks. Hardened areas on the Mall would be part of a rainwater collection system with cisterns storing graywater for irrigation use.

M. The National Park Service will continue to encourage the use of areas off the National Mall. The NCPC *Monumental Core Framework Plan* also examined this topic, and the Downtown D.C. Business Improvement District would like more activities downtown.

Comment	Letter 20. National Parks Conservation Association (cont.)	Response
	Regarding the matter of adding new paved or hardened areas, NPS planners have stated that redesign is necessary to meet compliance with the American's with Disabilities Act. Increasing the amount of paved or hardened areas also may have a beneficial impact in terms of aiding the National Mall capturing and using rain water to irrigate sections covered by turf. These are, in general, quite commendable objectives. Still, several questions remain including: • What is the total acreage of proposed new paved or hardened areas? • What would be the net change, if any, in newly paved or hardened areas? • What other impacts would these new hardened areas have? • How would NPS mitigate any increase in paved or hardened areas? On-the-ground agency cooperation The Draft EIS lists the Smithsonian, the U.S. Department of Agriculture, and the Architect of the Capitol among a list of cooperating agencies and participants. Representatives from each attended National Mall planning meetings in April 2006 and NPS planners have received and incorporated over 1,000 comments from these cooperating departments and agencies. Understanding that these comments are pre-decisional, nonetheless, the public is left to wonder what options-if any- have been considered to incorporate these adjacent lands managed by other federal agencies into the planning process. Such collaboration might reduce the need for new construction on the National Mall itself, while meeting visitor needs.	
N	○ Have NPS, the Smithsonian, and other appropriate cooperating agencies, jointly discussed a range of potential collaborations, ranging from the location of restrooms to the establishment of visitor service kiosks, stations, and structures?	N. We have discussed visitor facilities with the managers of surrounding visitor destinations. As stated in the *Draft Environmental Impact Statement* on pages 90 and 210, the National Park Service would work with the National Gallery of Art and the Smithsonian Institution to improve access to visitor services in existing and proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information.
O	The Draft EIS states that "visual and physical connections" between the Mall and Capitol would be improved,[6] and the preferred alternative for circulation calls for the extension of "Circulator-like" bus service from the National Mall to Capitol Hill. This is a good beginning. As the Park Service considers replacing Tourmobile with high-quality, sustainable, and affordable transportation services that could include a "two-way National Mall route" with loops linking the Mall to downtown Washington, D.C. [7] emphasis should be placed on developing a comprehensive, hop-on, hop-off, low-cost transit service that links all the important areas of the National Mall from the Lincoln Memorial to the U.S. Capitol, and all points in between, including the Smithsonian Museums, and other attractions.	O. This is proposed in the *Visitor Transportation Study*.
P	• Have NPS, the Smithsonian, and other appropriate cooperating agencies, jointly discussed a range of potential collaborations, from the location of restrooms to the establishment of visitor service kiosks, stations, structures, or other strategies using existing facilities? If not, when can that discussion occur?	P. Please see response M to your letter. NPS managers have had and will continue to have discussions with other cooperating agencies about such opportunities.
Q	• Regarding transportation, are the Smithsonian, the Architect of the Capitol, and other cooperating agencies interested in collaborating with NPS to develop a year-	Q. No decision has been made about who would operate a visitor transportation service. Discussions have been started with public transportation providers.
	[6] 89 [7] 450 4 | Page	

Comment	Letter 20. National Parks Conservation Association (cont.)	Response
	round convenient, affordable circulator bus system that would move visitors among all the attractions on the Mall?	
R	The preferred alternative identifies the National Mall as the nation's premier civic space. It prioritizes the need for improvements that will make the Mall more accessible, more sustainable, and capable of meeting the changing needs of an increasingly diverse society, while respecting the "planned historic character and visions" of early planners like L'Enfant and McMillan. The Draft EIS rhetoric is especially strong regarding sustainability and emphasizes the intention of the Park Service to develop water conservation measures, reduce energy consumption and solid waste output, and participate in the EPA's "Climate Friendly Parks" program. These are but a handful of the sound management concepts presented in the Draft EIS that will contribute to the overall enhancement of the National Mall.	R. We agree that there are additional sound management concepts.
S	The ideas offered in the Draft EIS are generally good but the concepts are presented without sufficient context. As a result, we are frustrated by the fact that the Park Service is asking the public to comment on a plan whose impacts cannot be evaluated. NPCA respectfully requests that the Park Service provide greater detail about the location, nature, and impact of proposed developments and redesign projects in the EIS for the National Mall before moving ahead with subsequent planning.	S. The purpose of NPS vision plans is to provide a coordinated and comprehensive written program for future action to protect America's national parks, and they are prepared with public involvement and environmental analysis in accordance with the National Environmental Policy Act. The proposed National Mall plan provides a cohesive guideline for future management by addressing physical development needs as well as resource protection, the civic forum, circulation, visitor enjoyment, and park operations.
	Sincerely, Alan Spears Legislative Representative 1300 19th Street NW #300 Washington, DC 20036 202/454-3384	
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Comment	Letter 21. National Trust for Historic Preservation	Response
	NATIONAL TRUST FOR HISTORIC PRESERVATION® March 18, 2010 Ms. Susan Spain National Mall and National Parks National Park Service 900 Ohio Drive SW Washington, DC 20024 ATTN: Draft National Mall Plan / Environmental Impact Statement Dear Ms. Spain: I am writing on behalf of the National Trust for Historic Preservation to provide comments regarding the Draft National Mall Plan / Environmental Impact Statement ("DEIS"). The National Trust strongly supports efforts to better maintain and preserve the National Mall and to make this extraordinary civic space more accessible to the public. Consequently, the National Trust has been actively engaged in consultation with the National Park Service and other stakeholders regarding the preservation of the National Mall, which is one of our nation's most significant historic landscapes. We have provided extensive comments during the National Park Service's planning process, and wish to join the DC Preservation League, American Society of Landscape Architects, and others in commending the Park Service for its hard work and public outreach to prepare the Draft National Mall Plan. **The National Mall would benefit from a comprehensive vision and planning approach.**	
A	Unfortunately, one of the primary defects in the Draft National Mall Plan is its failure to take a comprehensive look at the National Mall as a whole and not simply at the National Park Service property. Through its planning process, we understand that the National Park Service aspires to establish "a comprehensive vision and framework to protect the historic character of the National Mall, to restore its health and beauty, to help it function better as America's civic space, and to meet the needs of local, national, and international visitors today and tomorrow for enjoyment, education, and recreation." [DEIS p. 8] However, the Draft National Mall Plan as written provides a conceptual framework for stewardship only of the portion of the National Mall under the jurisdiction of the National Park Service. As the Advisory Council on Historic Preservation observed in its March 17, 2010 comment letter, "The scope of the National Mall Plan is limited to 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."	A. Because the National Park Service has no control over areas beyond its borders, we have worked closely with cooperating agencies as well as planning offices and agencies to ensure coordinated, complementary, and cohesive planning for the areas covered in the McMillan plan. The proposed plan is a vision plan for all lands on the National Mall under the jurisdiction of the National Park Service, which excludes the lands on which the buildings of the Smithsonian Institution, the National Gallery of Art, and the U.S. Department of Agriculture are located. However, the proposed plan presents a vision for the National Mall that is consistent with the other vision plans for this area, such as the NCPC *Extending the Legacy* (1997), the *Center City Action Agenda* (DC 2008), the NCPC *Memorials and Museums Master Plan* (2001), and the NCPC *Monumental Core Framework Plan* (2009). The NCPC *Legacy* plan is the successor to earlier plans, such as the L'Enfant and McMillan plans (see DEIS, p. 42), and other plans are all compatible with the *Legacy* plan. The National Park Service considers the National Mall plan to be one of the implementing plans for the *Legacy* plan.
	1785 Massachusetts Avenue, NW Washington, DC 20036 P 202.588.6035 F 202.588.6272 E law@nthp.org www.preservationnation.org	

Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
B	Ms. Susan Spain March 18, 2010 Page 2 In our view, the successful preservation of the National Mall depends upon fully integrating the planning processes of all of the responsible agencies and entities into a long-term, big-picture vision and planning approach. The National Trust continues to support a comprehensive, long-range visionary plan for the entire National Mall and we do not believe it is possible to develop this vision solely within the National Park Service's jurisdiction. This view is supported by other notable entities as well. For example, the American Society of Landscape Architects testified on March 4, 2010, before the National Capital Planning Commission, that "there must be close coordination and cooperation among all of the institutional stakeholders. Not all of the needs of the National Mall can be met within the narrow precincts of the area consigned to the stewardship of the Park Service, and planning for the National Mall and the federal precincts cannot be done in isolation." The National Park Service's attempts to address the limited scope of its planning process do not correct the overall deficiency of the Draft National Mall Plan. Specifically, in 2006, the National Park Service invited eighteen federal and DC stakeholder agencies to provide their views early on in the process and to "cooperate in the preparation of a National Mall plan." [DEIS p. 545] Later, the National Park Service and some of the cooperating agencies jointly developed a set of twenty-one planning principles to guide the National Mall Plan. According to the National Park Service, these planning principles "formed the basis for the plan objectives presented in the National Mall Plan." [DEIS p. 544] The second planning principle, for instance, states that "Historic and natural resources will be protected and maintained." Importantly, the fourth planning principle states that "Cooperating agencies will coordinate planning, information, services, facilities, and programs for visitors, residents, and the local workforce." In our view, however, the Draft National Mall Plan does not indicate that the cooperating agencies have coordinated the provision of visitor facilities. As the DC Preservation League testified before the National Capital Planning Commission on March 4, 2010, the Draft National Mall Plan "requires placement of all visitor amenities on NPS property, and none on property of adjacent federal (or federally chartered) entities." The DC Preservation League's March 4th testimony continues: From the standpoint of historic preservation, by trying to accommodate all the desired uses and amenities of the Mall on property managed by the Park Service, the Park Service	B. While consulting parties may represent specific constituents, the planning team was careful to keep meetings for cooperating agencies and for NHPA section 106 consulting parties separate to avoid a perception that some groups have more influence than general citizens. As stated in the *Draft Environmental Impact Statement* on pages 544–46, cooperating agencies participated in many multiday workshops to help develop planning principles, the preliminary range of alternatives, and the preliminary preferred alternative, as well as internal reviews of the draft document before its publication. Most cooperating agencies chose not to participate in section 106 meetings for consulting parties.

Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
	Ms. Susan Spain March 18, 2010 Page 3	
	necessarily concentrates the impacts on historic properties on its own property, while limiting the options for mitigation. ... We are informed that the Park Service has worked closely with other stakeholders of the Mall. What does not appear in the preferred alternative is any sense that those stakeholders are making their own contributions to the comprehensive and optimal development of the Mall.	
	In short, a much more integrated planning vision is needed, which will avoid concentrating the adverse impacts exclusively on National Park Service land. If the National Park Service declines to take a more comprehensive approach to the future vision of the National Mall, at a minimum, the twenty-one	
C	planning principles that reflect the other stakeholders' concerns must be expressly incorporated into the National Mall Plan itself and be fully considered in the specific direction and implementation of the plan.	C. As discussed in the NHPA section 106 consultations, the planning principles from newsletter 2, which informed the planning objectives, have been updated and added as appendix F to the final document.
	The Draft National Mall Plan calls for too many new structures on the National Mall, which have the potential to undermine its historic integrity.	
D	The National Trust is concerned that the Draft National Mall Plan calls for the construction of too many new ancillary buildings on the National Mall, which is supposedly considered to be a "substantially completed work of civic art." According to the draft plan, the National Mall "must be refurbished so that (1) its treasured memorials and historic landscapes can be preserved, (2) very high levels of use can be sustained, and (3) the needs of visitors can be met." [DEIS p. 4] To meet this three-prong need, the Draft National Mall Plan sets out to provide "Various visitor and commercial amenities ... that are conveniently located and that are sized and configured to meet visitor use levels on high-volume days." [DEIS p. 7] Consequently, the National Park Service's preferred alternative proposes a considerable number of new permanent ancillary structures to be constructed within the area subject to the agency's jurisdiction on the National Mall, including the following projects:	D. The National Mall is large and primarily a walking environment, so it is vital that facilities be well dispersed. There has been a long history on the National Mall of providing facilities that are too small or of denying the need for facilities, resulting in resource damage or pressure for additional facilities. The proposed plan recognizes that high levels of visitation will continue and will in all probability increase. This is not an issue to be taken lightly, and we have examined best practices used within the United States and around the world to learn how others have successfully dealt with many of the same problems that need to be addressed on the National Mall. *Tourism Congestion Management at Natural and Cultural Sites* (World Tourism Organization 2004) identifies successful approaches to developing facilities and managing congestion around the world. At the Louvre this included providing a large new paved entry courtyard (the Pei pyramid), conserving historic buildings, developing additional visitor facilities underground, and dispersing smaller visitor facilities such as food service and restrooms to avoid congestion. The document also states the following: "Particular care should be devoted to preserving and upgrading monuments, shrines and museums, as well as archeological and historic sites which must be widely open to tourist visits. . . . Site managers and staff need to carefully monitor the way the visitors interact with the site. . . . When crowd management techniques are likely to adversely impact on the important values of the destination or site, consideration should be given the relocating the proposed event to another, less sensitive venue."
	▪ Union Square, new food service and restroom structures ▪ Smithsonian Metro Station, new visitor contact station and restroom structures ▪ Washington Monument grounds, new multi-purpose visitor facility ▪ Constitution Gardens grounds, new multi-purpose visitor facility ▪ Tidal Basin area, new multi-purpose visitor facility ▪ Lincoln Memorial grounds, new restroom structure ▪ Ash Woods, new stable, food service, and restroom structures	

- Franklin Delano Roosevelt Memorial, new food service and restroom structures
- Thomas Jefferson Memorial grounds, new food service, retail, and restroom facility

We acknowledge that the Park Service also intends to use mobile food carts and refreshment stands as well as temporary portable restrooms during high-use seasons and special events. [DEIS p. 87] We understand that "The size and character of [Union Square] visitor facilities and amenities would be determined during design." [DEIS p. 89] We appreciate that the Park Service intends that these new structures would be "designed to be compatible with the character of the National Mall." [DEIS p. 86] We also certainly support that "The National Park Service would encourage partnerships between all visitor destinations along the Mall to serve visitor needs. ... NPS staff would also work with the National Gallery of Art and the Smithsonian Institution to improve access to food service and restrooms for National Mall visitors." [DEIS pp. 89, 90]

On the other hand, it is readily apparent that the draft plan calls for the National Park Service to build its way out of the challenge of accommodating public use of the historic landscape. The National Trust shares the concern expressed by the National Coalition to Save Our Mall in its March 4, 2010 testimony before the National Capital Planning Commission that the proposed introduction of "numerous kiosks, restaurants, restroom facilities, and visitor centers on the open space could have dramatic and adverse impacts on the historic quality and landscape character of the National Mall."

E

E. All facilities would be sited to reduce impacts and would be outside primary and secondary vistas and views. Multipurpose facilities rather than single-purpose facilities are proposed to reduce the number of new structures. As stated in the *Draft Environmental Impact Statement* on page 83, "The National Park Service would ensure compatible and enduring high-quality design, as well as the highest facility maintenance standards, to create a sense of place that would reinforce the civic, historic, and symbolic role of the National Mall to our nation."

Moreover, the National Trust is concerned that the Draft National Mall Plan places too much emphasis on using permanent new structures to accommodate peak public events on the Mall, such as inaugurations and Independence Day celebrations. This is a recipe to over-build the National Mall. Indeed, one of the so-called best practices which guided the development of the preferred alternative is that the National Park Service should provide "Sufficient convenient and accessible visitor amenities (rest areas, water, food service, gift shops, and stroller and locker rentals) should be sized and configured to meet the visitation levels on high-volume days." [DNMP p. 53] (By contrast, the cooperating agencies' fifth planning principle states that "Facilities will be ... appropriately sized to meet a range of uses." The planning principles do not recommend building out the National Mall to accommodate visitation levels on high-volume days.) Instead, we believe the plan should rely much more heavily on temporary infrastructure, which can be

F

F. The National Mall hosts thousands of events annually, each requiring various levels of support. The volume of almost continuous use has resulted in a near constant proliferation of temporary facilities, such as toilets. Portable toilets are unacceptable to most women and children, and the accompanying odor is unpleasant for nearby visitors. The proposed plan carefully balances the need for temporary and permanent facilities so that current and expected levels of use can be accommodated without having the National Mall appear to be a constant construction zone.

G

G. The proposed plan does not recommend building for the highest use levels, which is never a good practice. It does recognize that some areas will always receive high levels of use, either because they are close to tour bus drop-offs or locations that are nearly continually used for permitted events. Facilities in these areas would be sized and designed for efficient use. The objective has been rephrased to say "flexibly meet visitor-use patterns during the peak season."

Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
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	removed when visitor use is at normal levels. Designing to accommodate the maximum-use public events with permanent new buildings would greatly exacerbate the adverse impacts of this plan on the National Mall, and would needlessly destroy too much public open space.	
H	**The National Park Service must prioritize the list of projects in the draft plan, and should limit any new facilities to those that are necessary.**	H. We suggest that a listing of priorities and development map accompany a programmatic agreement with the Advisory Council on Historic Preservation and the D.C. Historic Preservation Office.
I	In the National Trust's view, very special sensitivity must be used when proposing, siting, and designing any new permanent buildings anywhere on the National Mall.	I. We agree.
J	First, we consider it essential that the National Park Service objectively assess and demonstrate the necessity of any new ancillary facilities as it implements this conceptual framework plan. The cooperating agencies' twenty-first planning principle states that "Business services will provide a range of necessary and appropriate commercial visitor services and products of consistent high quality at a range of prices." A visitor service proposed for the National Mall which could be appropriately provided off of the Mall would violate this principle. To its credit, the Draft National Mall Plan indicates that the National Park Service will "assess the economic feasibility, necessity, and appropriateness" of changes to existing facilities as well as for the construction of "additional food service, retail, and recreation equipment rentals." [DEIS p. 71, 83]	J. The National Mall plan proposes that visitor facilities be better dispersed to conveniently meet visitor needs. As stated in the *Draft Environmental Impact Statement* on page 484, "Under the preferred alternative visitor facilities and amenities would be provided on the National Mall to accommodate the high levels of visitation it receives. Visitor facilities and amenities would be conveniently located, and they would generally be designed to serve multiple purposes and to incorporate naturally compatible amenities, such as restrooms near food service locations or seating and information by restrooms, in accordance with best practices used at other sites."
K	Second, the National Trust continues to strongly recommend that the National Park Service evaluate opportunities for locating necessary visitor amenities "behind the architectural line," in areas under the control of the Smithsonian, National Gallery, Department of Agriculture, and other entities. New ancillary facilities should be designed, programmed, and implemented within the Mall only after a thorough reconsideration of ways the National Park Service might work with other agencies to offer combined visitor services for the National Mall. For example, the National Park Service should collaborate with the Smithsonian to determine what visitor amenities could be offered through the restoration and reuse of the Arts & Industries Building. An inter-agency visitor services agreement to reuse some or all of the Arts & Industries Building in this way could reduce development on the historic landscape of the Mall and dramatically improve the visitor's experience and understanding of the National Mall's historic resources.	K. As stated in the *Draft Environmental Impact Statement* on pages 90 and 210, the National Park Service would continue to explore the ability of adjacent museums to provide new access to existing or proposed facilities. Please see the discussion of facilities under "Summary of Comments and Responses" beginning on page 11 for more information. Regarding the Arts and Industries Building, please see letter 14.2H.

Comment	Letter 21. National Trust for Historic Preservation (cont.)	Response
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L	Third, the National Park Service should revise the Draft National Mall Plan to clearly prioritize the list of specific projects outlined in the preferred alternative. In its March 17, 2010 comments, the Advisory Council on Historic Preservation observes that the Draft National Mall Plan "functions effectively as a set of coordinated action items" and has urged the National Park Service to revise the plan to "establish a consistent approach to these projects, and in particular, identify principles and priorities for decision making on individually funded projects." The National Trust also concurs with the National Capital Planning Commission's February 25, 2010, staff report when it recommends that the National Park Service "Prioritize short-term and long-term projects to support progress in the implementation of the Plan." (For example, the NCPC staff report describes the redevelopment of Union Square as "one of the linchpins" of the plan and "an early priority" for the Commission's staff.) Although the National Park Service's priorities for the plan's specific projects may change over time, the National Trust believes that sharing the Park Service's priorities during the planning process is one step to ensure that "park spaces and structures [on the National Mall] will welcome all and ... will feature the highest quality of sustainable design, construction, and maintenance"—as the cooperating agencies' first planning principle requires. Thank you in advance for considering the views of the National Trust for Historic Preservation regarding the Draft National Mall Plan. We look forward to participating in future consultation pursuant to Section 106 as the National Park Service's plan is implemented, including those site-specific actions highlighted on Table 41 at page 547 of the Draft National Mall Plan. With best regards. Sincerely,  Robert Nieweg Director and Regional Attorney Southern Field Office National Trust for Historic Preservation	L. Please see response H to your letter.

Comment	Letter 22. Society of Architectural Historians, Latrobe Society	Response
	Latrobe Chapter • **SOCIETY OF ARCHITECTURAL HISTORIANS** • Washington, D.C.  Dear Colleagues, As historians and preservationists we favor conservation and restoration of the Mall System. We do not encourage new elements that renovate areas creating uninvited change to the whole. For instance, rearranging the Union Square area can achieve the goals of this report without introducing yet another design. Restoration of the streets, paved areas, fountains, and plantings intended and depicted in the McMillan Plan would serve today's needs without disturbance to the unity of the 1901-2 plan. In regard to accommodating demonstrations and events at numerous sites, the plan common to all alternatives (Draft National Mall Plan p 77) with "enhanced monitoring procedure to ensure that resources are better protected") achieves the desired outcome without adding new and visible changes such as buildings, bathrooms, and concrete paths and pads in places meant to be grass. In all cases creative solutions to identified problems such as water quality and others should be applied without attendant design changes. These small changes add up to altering the totality of the historic resource the Park Commission called "the Mall system." There is a duty here to do no harm. We urge the National Park Service to search ceaselessly for ways to find solutions to wear and usage problems that will maintain the greensward and the trees of the entire Mall assembly as designed, without any added paving. We find there is a gap in reasoning between calling for the rebuilding of such areas as the Tidal Basin or Constitution gardens and the piling on of changes in the name of that necessary reconstruction. In the interest of accommodating the needs and appetites of the visitors we call for a contractual change at the highest level among the Park service, the District of Columbia and the Smithsonian. The boundaries among them prompt the new facilities for information, creature comforts, food and shops called for in this plan, which already exist in Smithsonian facilities. Security, lighting, signage and landscape design all happen within the same spatial envelope so should be done by these agencies as single systems. We understand and support the goal stated by the National Park Service in this draft "to prepare a long-term plan that will restore the National Mall." We differ as to the comprehensive nature of the Mall. In historical terms the Mall has been understood as a unified composition by L'Enfant, McMillan Commission, and the Fine Arts Commission and architectural historians such as Richard Guy Wilson, John Reps, Richard Longstreth, Jon Peterson, Kirk Savage, Pamela	
A		A. It is clear that Union Square is not well used and that it does not meet the McMillan plan goal to be a connection between the U.S. Capitol grounds and the Mall. The issues of congestion and high levels of use require that all areas of the National Mall be able to function flexibly now and in the future.
B		B. Sustainable solutions must be used to address issues like water quality and water volume, and to comply with policies to reduce the use of potable water. The large designed water features are the primary reasons why the National Mall is the highest user of potable water in the national park system. The impacts of small actions do add up, which is why the National Environmental Policy Act requires that the cumulative impacts of past, present, and reasonably foreseeable projects be analyzed. This concern has also been addressed during the NHPA section 106 consultations, where interested parties identified historic elements and features, as well as ways to avoid, minimize, or mitigate adverse effects.
C		**C.** These systems are all part of the pedestrian environment and need to be coordinated.

Comment	Letter 22. Society of Architectural Historians, Latrobe Society (cont.)	Response
D	Scott, Cynthia Field, Don Hawkins, to name but a few. The historical term, the "Mall System", used by the McMillan Commission, recognizes the different parts that make up the whole and yet understands the meaning of the whole to be paramount. Their report stated that ""the Capitol, White House, and [Washington] Monument shall become constituent parts of one composition." (Park Plan Commission Report under Axial Relationships). Our work in interpreting the past points to the success of a visionary plan for the Mall System. To ignore this lesson is to allow us to fall into the disarray of low points in this history. Historical studies of the history of the Mall and its changes over time demonstrate that its success has been the result of visionary plans done by selected experts chosen for their distinction and not employed by any of the stakeholders. In the case of the Mall the lesson is clearly that a new visionary plan should first set the goals for practical alteration. Representing the Latrobe Chapter of the Society of Architectural Historians, Dr. Cynthia R. Field	D. Because the National Park Service has no control over areas beyond its boundaries, we have worked closely with cooperating agencies as well as planning offices and agencies to ensure that planning is coordinated, complementary, and cohesive for the areas covered in the McMillan plan. During the NHPA section 106 consultations, the National Park Service recommended updating the National Mall nomination to the National Register of Historic Places.

Comment	Letter 23. Trust for the National Mall	Response
A	March 2, 2010 Mr. Marcel Acosta Executive Director National Capital Planning Commission 401 9th Street, NW Suite 500 North Washington, DC 20004 TRUST FOR THE NATIONAL MALL 601 Thirteenth Street, NW Suite 300 North Washington, DC 20005 T 202.737.3330 F 202.347.5943 Dear Marcel: The Trust for the National Mall applauds the National Park Service for their dedicated work on the National Mall Plan. The Park Service has led an unprecedented and inclusive planning process for the future of the National Mall. The Plan reflects the input of more than 30,000 Americans, research into best park practices around the globe, the guidance of more than 100 consulting parties, and outreach to the best and the brightest from a multitude of disciplines. The Park Service has taken a smart and open approach to working with the District Planning Agency, the National Capitol Planning Commission, the Commission on Fine Arts and the Architect of the Capitol to make certain that the interests of all are reflected, and dovetail the multiple planning efforts now underway. The Trust for the National Mall supports the Park Service's Preferred Alternative and is eager to get to work implementing the Plan, which we think is a well-conceived framework for National Mall's future. The following components have been well-addressed including: enhancing the park's infrastructure and protecting it as a place for first amendment demonstrations; making certain that the long-term care, health and beauty of the park's natural resources are made a priority; ensuring that the needs of park visitors are met in a respectful, appropriate and inviting manner; and engaging visitors in meaningful ways that reflect the great history and character of America's Front Yard. It is paramount that the park's infrastructure is restored to the highest standards that reflects the great pride that we have in our country and its premier civic space. With more than $400 million in deferred maintenance, we can no longer wait to invest in the restoration and improvement of the park. The areas, including Union Square, outlined in the Preferred Alternative will create more space for public demonstration while simultaneously addressing the long-term sustainability of the park's natural resources and protecting its historic character. The Plan finally identifies the need to repair the park's waterways that have rightly received the lion-share of criticism and deter public enjoyment of the National Mall. With more than 30 million annual visits, the park was never designed to handle the magnitude of people who come each year to share this glorious space. The Preferred Alternative identifies a number of areas that will support the people load and visitor's needs, creating mixed-used (food, bathroom, souvenir shops and performance space) sustainable facilities that reduce the potential footprint of required additional amenities. At the same time, the Park Service has also been mindful of widening walkways, providing more accessibility and creating a more fluid and pleasant visitor experience. It is important and right that the Preferred Alternative focuses on the visitor's experience making certain that all who come are engaged in meaningful ways and that the Park Service acts as an engaged steward	A. The National Park Service greatly appreciates your efforts dedicated to making the National Mall the best park in the world.

Comment	Letter 23. Trust for the National Mall (cont.)	Response
	of the great history and character of this iconic park. The National Mall serves as a pilgrimage for Americans and international guests alike and better use of technology, tours, talks, and performances are critical to making this a more vibrant and active park. Together with the recently completed Visitor Transportation Study, the Preferred Alternative provides a framework for an integrated transportation solution that meets the needs of people moving from public transportation nodes in and out of the park, while addressing the pedestrian and bike environments. This is exactly the type of coordination that is needed for a seamless visitor experience in the Nation's capital. The Trust hopes the National Capitol Planning Commission shares our enthusiasm for the Preferred Alternative and acts immediately in its support. It is the Trust's belief that together, with this significant and successful Mall Planning effort completed, we can make the National Mall the best park in the world. Sincerely,  Caroline Cunningham President	

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REGIONAL GOVERNMENTS

Comment	Letter 24. City of Alexandria, Virginia	Response
	 *City of Alexandria, Virginia* *301 King Street, Suite 2300* *Alexandria, Virginia 22314*  *William D. Euille* *Mayor* *City Hall: (703) 838-4500* *Home: (703) 836-2680* *Fax: (703) 838-6433* *alexvamayor@aol.com* March 5, 2010 National Mall Plan National Mall and Memorial Parks 900 Ohio Drive S.W. Washington, D.C. 20024 On behalf of the Alexandria City Council, I want to thank the National Park Service for their initiative in developing this plan to guide rehabilitation of the National Mall, to help it function better as our country's primary civic space, to address visitor needs for access, recreation, facilities and services, and to improve park operations and sustainability. We appreciate the opportunity to offer comments. The *Draft National Mall Plan and Environmental Impact Statement* thoughtfully addresses many of the challenges facing the National Mall. Our comments will focus on a few specific but very important aspects of the plan that concern *access* – to and from the National Mall, and the surrounding region generally, and Alexandria in particular.	
A	The City recommends that the following access issues be addressed in the Plan: bike and pedestrian connectivity to bridges across Potomac River, including wayfinding to the Mount Vernon Trail and other destinations; vehicular and transit access across the Potomac during peak traffic periods including large events on the Mall; adequate vehicular circulation and access within the Mall area so as not to impact roadways across the Potomac. The City recommends that parking and shuttle bus options to the National Mall from Alexandria should be addressed in the plan.	A. Potomac River bridge projects will be undertaken by others, and the *Draft Environmental Impact Statement* evaluated the interrelationships of these ideas. Improved bicycle and pedestrian access on all Potomac River bridges is compatible with the proposed National Mall plan and would encourage sustainable circulation methods. The proposed plan would improve bicycle or pedestrian access to the Theodore Roosevelt Memorial Bridge, which is recommended by the *Monumental Core Framework Plan* (see DEIS, p. 44). Together, the *Monumental Core Framework Plan,* the proposed National Mall plan, and D.C. pedestrian and bicycle plans have defined a cohesive vision for improved pedestrian and bicycle access and connections for the areas you mention. One step to improve pedestrian and bicycle connections over Potomac River bridges is the Ohio Drive roadwork project, which is underway. The 14th Street bridge corridor would also address these issues. As you note, other actions will take a much longer time. Parking and shuttle bus options need to be part of a larger tour bus management approach, as described in the *Draft Environmental Impact Statement* on pages 70, 85, and 168 (actions for row 5.8).
B	The City supports a greater emphasis in the plan on a water taxi stop. In the past few years, water taxi service on the Potomac River has expanded significantly and there is clear evidence of growing demand. Among the locations now connected by water taxi are Georgetown, Old Town Alexandria, National Harbor, and Nationals Park. Work is progressing on a proposed water taxi stop at National Airport, and possibly a commuter service from Prince William County. In addition, there are a number of planned waterfront development projects in Washington, D.C. that will increase the number of residents, workers, and visitors in close proximity to marina facilities that could serve as water taxi stops. It is not difficult to imagine that many Washington, D.C. area visitors would enjoy arriving to the National Mall by water taxi, or using a water taxi to continue their tour of the area by water. *"Home Town of George Washington and Robert E. Lee"*	B. While it is not the intent of the National Park Service to provide water taxis, the proposed plan would accommodate them; see the *Draft Environmental Impact Statement,* pages 94 and 240 (actions for row 24.2). Water taxi service with transfers to other transit modes is included in the *Monumental Core Framework Plan,* as it was in the *Legacy* plan, and this has been clarified in the final document.

Comment	Letter 24. City of Alexandria, Virginia (cont.)	Response
C	The National Mall has limited opportunities for additional parking and access is an issue. Water taxis apparently can provide substantive increases in transportation capacity: the Old Town Alexandria - National Harbor Water Taxi reports that it carried about 100,000 person-trips in its first year of operation and that number is increasing. The City notes that the proposed location in West Potomac Park is likely the best option, as a water taxi stop at the foot of the Lincoln Memorial steps is undesirable for historic and esthetic reasons. The City suggests a location either near the John Ericsson National Memorial (where there is a direct pedestrian connection to the Lincoln Memorial) or where Ohio Drive SW meets West Basin Drive SW. This second location is farther from the Mall itself but very close to the entrance of the FDR Memorial, which is designated as a transportation hub. Alexandria is currently preparing a new plan for our waterfront area, including our public spaces, and we are encountering many of the same issues that are addressed in the *Draft National Mall Plan and Environmental Impact Statement.* We appreciate the significant undertaking it is to collaboratively develop a plan for the future of this national treasure. We are pleased to provide additional information and answer questions regarding any of our comments. Sincerely,  William D. Euille Mayor cc: The Honorable Members of City Council James K. Hartmann, City Manager Mark Jinks, Deputy City Manager Faroll Hamer, Director, Planning and Zoning Rich Baier, Director, Transportation and Environmental Services James Spengler, Director, Recreation, Parks and Cultural Activities	C. Your suggestion for a water taxi stop near the John Ericsson Memorial is noted. Appropriate locations and design of nodes would require further study and approvals as proposals were made.

Comment	Letter 25. Loudoun County, Virginia	Response
	Loudoun County, Virginia Thank you for the opportunity to comment on the above referenced project. Loudoun County has no comments at this time. Sincerely, Marie Genovese Marie Genovese, AICP Planner, Community Planning 1 Harrison Street, 3rd Floor Leesburg, VA 20177 Phone (703) 777-0246 Fax (703) 777-0441	[Editor's Note: Loudoun County, Virginia, submitted its comment by e-mail.]

Comment	Letter 26. Maryland Department of Transportation	Response
	TSO Secretary MDOT <Secretary@mdot.state.md.us> To <nationalmallplan@nps.gov> cc 02/12/2010 01:20 PM Subject: Thank You for Contacting Secretary Swaim-Staley On behalf of Governor O'Malley and Lieutenant Governor Brown, I want to thank you for contacting the Maryland Department of Transportation. Your input is very important. Either a member of my staff or I will contact you shortly.	[Editor's Note: The Maryland Department of Transportation submitted comments by e-mail.]

Comment	Letter 27. American Institute of Architects	Response
A	AIA Washington DC The Washington Chapter of the American Institute of Architects 1777 Church Street, NW - Washington, D.C. 20036 - 202.667.1798 - Fax: 202.667.4327 - www.aiadc.com March 16, 2010 National Mall and Memorial Parks ATTN: National Mall Plan 900 Ohio Drive, SW Washington, DC 20024 Dear National Mall Plan Team: On behalf of the Board of Directors of the Washington DC Chapter of the American Institute of Architects I am delighted to have the opportunity to comment on the *Draft Mall Plan/Environmental Impact Statement.* The Mall as we know it today is due in no small part to the efforts of one of the founders of our Chapter, Glenn Brown. It was Mr. Brown who convinced Senator McMillan to call for a plan and the rest, as they say, is history. It is therefore, with a sense of this Chapter's role in the history of this important civic space that we let you know that while we generally support the Preferred Alternative, we believe this plan offers the opportunity to do more: the Mall should be a showcase for sustainable design. This is not without precedent. The formal design of landscape and plazas in the McMillan Commission plan influenced many civic spaces in this country and around the world. It would be appropriate in this current review of the Mall to be as forward-thinking and influential as the Commission was by using the best design tools of the day.	A. We agree that the National Mall should be a showcase or influential role model for sustainable design. Several other topics where the National Mall should set an example have been suggested in the plan or by the public, including civic space, universal accessible design, pedestrian environment/walkability, and visitor facilities such as restrooms.
B	Therefore, we strongly urge you to supplement your Preferred Alternative by incorporating sustainable design features. For example, as most visitors arrive by Metro or bus to the Mall, you could emphasize the importance of public transportation by keeping your visitor contact station connected to the Metro Station as outlined in Alternatives B and C. The plan should also favor the pedestrian whenever possible, by providing appropriate sustainable paving, keeping the crosswalks across the Mall, and reducing the danger of crossing from the Mall to the Tidal Basin Area. In addition, water features that are sustainable, such as those suggested in Alternative C for the Union Square Area, would add greatly to visitor comfort and provide an opportunity to educate on the importance on water conservation. We believe that making sustainable design practices a key element of the plan will not only improve it, but will show the Federal Government leading the country forward on this important global issue. Sincerely, Steven Spurlock, AIA, LEED AP President 2010 OFFICERS | Steven Spurlock, AIA, President | Yolanda Cole, AIA, President Elect | Jonathan Penndorf, AIA, LEED AP, Treasurer | David Haresign, AIA, Secretary | David Dalleda, FAIA, Past President | Mary Fitch, AICP, Hon. AIA, Executive Director	B. The proposed plan sets a vision and describes sustainable goals, which would be required criteria for subsequent designs. The plan embraces maximizing principles established by both LEED and the Sustainable Sites Initiative™. It includes the ideas you support, such as the importance of public transportation, pedestrian improvements, and sustainable water use. We agree that the federal government can and should lead on this important global issue. Sustainability is required by Executive Orders 13423 and 13514, as well as NPS policies. Language related to sustainability has been updated and expanded, and information has been added about Executive Order 13514. Also, please see response 6.1D and letter 9 from the U.S. Environmental Protection Agency.

Comment	Letter 28. American Restroom Association	Response
	Robert Brubaker robert.brubaker@americanrestroom.org American Restroom Association [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	[EDITOR'S NOTE: Comment submitted online.]
A	When one Googles 'national mall restrooms' the first link they see is the American Restroom Association National Mall Restroom web page. http://americanrestroom.org/gov/nps This has resulted in our organization getting significant feedback about the problems people face finding restrooms when they visit the Mall. For the most part this plan addresses the issue, with one glaring exception. It appears to ignore the problem people face when they are on the east side of the mall before or after the museums are open. A majority of the National Mall Restroom feedback our organization receives on the subject relates to this problem. I would strongly encourage that some limited number of proper sanitation facilities be added to the plan for the east side of the Mall to address the serious deficiency. For the most part this plan addresses the issue with one glaring exception.	A. Concern about the lack of restrooms on the east end of the National Mall after museums close for the day was addressed in the plan for both Union Square and the Mall. See the *Draft Environmental Impact Statement*, pages 89, 90, 200 (actions for row 10.9), and 208–10 (actions for row 11.7).

Comment	Letter 29. Association of the Oldest Inhabitants of The District of Columbia	Response

The Association of the Oldest Inhabitants of The District of Columbia

Established Dec. 7, 1865

Officers:

President –
William N. Brown

Vice-president –
John Gill, Sr.

Treasurer –
Hulit Pressley Taylor

Secretary –
Seymour Selig

Historian –
Nelson Rimensnyder

Fire Dept. Liaison –
John Breen

Directors:

A.L. Wheeler –
Past-president

Carl Cole
Damon Cordom
Jan A. K. Evans
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Luncheon RSVP's
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Web site:
www.aoidc.org
E-mail:
aoi_of_dc@verizon.net

March 10, 2010

National Mall and Memorial Parks
Attn: National Mall Plan
900 Ohio Drive, SW
Washington, DC 20024

Dear Superintendent Piltzecker:

As the District's oldest civic organization – founded in 1865 – and dedicated to the maintenance and preservation of both the L'Enfant and McMillan Plans, the Association of the Oldest Inhabitants of the District of Columbia is pleased to comment on the Draft National Mall Plan and EIS.

First, we would like to commend Ms. Spain, her team, you and your staff for your research, documentation, attention to detail and thoroughness in your efforts to restore, improve and plan for the National Mall.

Second, of great concern to the AOI (but now somewhat ameliorated by the availability of funding through the American Recovery & Reinvestment Act of 2009) were the deteriorating conditions of the Reflecting Pool, World War I Memorial, Tidal Basin sea walls and other locales requiring immediate attention. We are pleased that these repairs will be addressed outside the scope of the Plan but we feel their needs must continue to be addressed, their maintenance ensured and their sight-lines preserved.

A

Third, the following will address our support and/or concerns for the National Mall Plan and our hope that our input will be given great consideration as the plan progresses:

-- The AOI supports many of the concepts and recommendations under the Preferred Alternative. We are first, and foremost, concerned about the immediate appearance of the green spaces of the Mall. We firmly believe that priority should be given to restoring (including re-engineering, irrigation, protection of) the grassy areas of the Mall. We believe the Mall's unique green space and vistas can benefit from a prohibition of all recreational activities (sporting events) on the Mall proper (soccer, rugby, football, baseball, etc.) which should be relegated to designated areas which currently exist in other locations on the Mall (West Potomac Park, the Ellipse, the area just northwest of the Lincoln Memorial or East Potomac Park). We believe that healthy life styles and recreation should be a part of the plan but not at the expense of the grassy areas of the

B

The Association of the Oldest Inhabitants of the District of Columbia -- the District's oldest civic organization -- was established on December 7, 1865, to preserve memories and matters of historic interest. By virtue of our long presence and participation in the city's prosperity and improvement, we continue to work and strive for the city's stability, security and advancement -- to aid in every way the prosperity and well-being of the District while preserving the heritage of its past.

A. We agree that maintenance needs to be ensured and sight lines preserved.

B. Vital to the health and long-term sustainability of the turf is the restoration of soils and the installation of an irrigation system. The plan proposes that small areas be restored more frequently. At the same time there have been agreements with the city since 1949 allowing recreational uses on the National Mall. As shown in the *Draft Environmental Impact Statement* on page 331, league activities occur in designated areas; these activities are occasionally superseded by permitted activities or weather conditions.

Comment	Letter 29. Association of the Oldest Inhabitants of The District of Columbia (cont.)	Response
C	**The Association of the Oldest Inhabitants of The District of Columbia** **Established Dec. 7, 1865** Mall – its vistas and views so striking and worthy of protection. Without prohibiting recreational activities on the Mall's lawns, we believe the Park Service will continue to expend extraordinary efforts and unnecessary maintenance funds attempting to maintain and repair the damage inflicted by sporting activities. -- We believe the Preferred Alternative incorporates and addresses the goals of all the alternatives: Historic Landscape & Education; a Welcoming National Civic Space for public Gatherings, Events & High-Use Levels; and, Focus on Urban Open Space, Urban Ecology, Recreation and Healthy Lifestyles. In order to address all of these goals, visitor amenities, safety and a positive visitor experience must serve the visitors but not distract from the memorials, historic views and vistas. However, we do not want to see an array of pavilions, information kiosks, restrooms and snack bars polluting these vistas while, at the same time, we recognize the need for food, comfort, information, shelter and safety. We believe the	C. We agree that visitor facilities should not distract from memorials, historic views, or vistas. Facilities will undergo design reviews and additional historic preservation consultations.
D	National Park Service should work with its partners (the National Coalition to Save the Mall, the Trust for the National Mall, the Smithsonian Institution and others) to share space in either the Smithsonian's Arts and Industries Building or the Agriculture Departments building on the Mall to design and establish a National Mall Visitors' Welcome Center. We picture the Park Service's Independence National Historical Park pavilion in Philadelphia, PA. Such an amenity could provide visitor services, a food court, orientation videos, a theatre, ticket acquisition for timed tours, First Aid Stations and restroom facilities. Both locations are convenient to Metro, Metro Bus, DC Circulator service and tour bus drop-offs. A facility such as this could provide not only the aforementioned amenities but would be a 'first stop' for the first-time or casual visitor to discover the many, varied programs, memorials and activities along the National Mall. It is somewhere a visitor could ask, "I have only three hours to spend on the Mall… our interests are democracy and history." With that, Park Service Rangers and volunteers could help that visitor construct a series of walks and activities that would address their specific needs within their time limitations. Smaller information kiosks, combined with snack bar/restroom facilities could still remain available throughout the Mall; but, there should be one, comprehensive, full-service facility that would be the visitor's first point of contact. Both of these wonderful facilities (the Arts and Industries Building and the Agriculture Department Annex) command the grandeur of architecture and location that the National Mall and its visitors deserve.	D. The National Park Service will continue to work with agencies such as the National Capital Planning Commission, the U.S. Commission of Fine Arts, the Smithsonian Institution, and our fund-raising partner The Trust for the National Mall. As shown on the inside front cover of the *Draft Environmental Impact Statement*, a number of agencies have worked with the National Park Service to develop the proposed plan. Other groups, such as the National Coalition to Save Our Mall, are not partners but advocacy groups, and they have participated in NHPA section 106 consultation meetings about historic preservation. Regarding the Arts and Industries Building, please see 14.2H from the D.C. Preservation League. The addition of a visitor center within the Reserve is prohibited by the Commemorative Works Act (see the definitions of a visitor center and visitor facilities on page 584 of the *Draft Environmental Impact Statement*, as well as the discussion on page 130 and on pages 571–75). However, a welcome area at the Smithsonian Metro station near 12th Street and Jefferson Drive would accomplish many of your objectives.
E	– We support the improvements envisioned for Union Square, Constitution Gardens, the Washington Monument grounds, the Lincoln Memorial, the Jefferson Memorial, Viet Nam Memorial, Korean Memorial, World War II Memorial, World War I Memorial and the soon-to-be Martin Luther King, Jr. Memorial; but, while we would welcome food services, additional or improved restrooms and information kiosks at or near all of these sites we are concerned that the Mall will be dotted with structures that interfere with its great open spaces. We recognize that locating these facilities and amenities underground would be nearly impossible, if not cost prohibitive, but every effort should be made to ensure they blend into the Mall's environment and do not distract from its grandeur, space or story. **The Association of the Oldest Inhabitants of the District of Columbia -- the District's oldest civic organization -- was established on December 7, 1865, to preserve memories and matters of historic interest. By virtue of our long presence and participation in the city's prosperity and improvement, we continue to work and strive for the city's stability, security and advancement -- to aid in every way the prosperity and well-being of the District while preserving the heritage of its past.**	E. Please see response C to your letter.

The Association of the Oldest Inhabitants of The District of Columbia

Established Dec. 7, 1865

F

G

H

-- In the interest of visitor safety and comfort, we agree that appropriate seating should be provided in shaded areas (to address heat issues during the summer months). Lighting consistent with 'green' technology that does not contribute significantly to light pollution to promote night time/after hours safety and sufficient drinking fountains should be available. We also believe that the Park Service should work diligently to ensure that visitors can navigate the long expanses of the National Mall based on their ability and time constraints. All efforts should be made to encourage, promote and welcome non-Park Service-contracted transportation providers (DC Circulator, 'pedicabs', hop on/off sightseeing providers, et al.) to facilitate the movement of visitors in and around the National Mall. Walking surfaces should be designed with sustainability in mind, ease on which wheelchairs and 'scooters' can traverse and walking surface maintainability. Gravel surfaces certainly have proved to be un-workable… concrete and/or asphalt is expensive to install, maintain and repair. We think that there should be alternatives in today's marketplace, sufficiently innovative to meet the 'traffic' requirements of the National Mall. Recycled automobile tires, assembled into large, easily replaceable sections, simulated wood planking from recycled materials (boardwalks and pedestrian bridges on the George Washington Memorial Parkway trails come to mind…) laid on a defined, slightly 'curbed' surface could replace all of the major walkways throughout the National Mall. All efforts should be made to discourage/prohibit social trails that cause so much damage and contribute to the maintenance nightmare of maintaining the lawns.

We genuinely hope that you will consider our comments, observations and recommendations and give great weight to the many other innovative, creative and visionary recommendations you receive in response to the draft plan so that as you move forward it is, in fact, a National Mall Plan and not just the National Park Service's plan for the national mall.

Sincerely,

William N. Brown, President

Attachment

Cc: National Coalition to Save Our Mall
The Trust for the National Mall

The Association of the Oldest Inhabitants of the District of Columbia -- the District's oldest civic organization -- was established on December 7, 1865, to preserve memories and matters of historic interest. By virtue of our long presence and participation in the city's prosperity and improvement, we continue to work and strive for the city's stability, security and advancement -- to aid in every way the prosperity and well-being of the District while preserving the heritage of its past.

F. The plan proposes additional seating in shaded areas; access to shady turf areas would remain.

G. We share your concern for visitor safety and comfort, as well as lighting that does not contribute to light pollution.

H. The National Mall lends itself to being a role model for a walkable urban park, and we share your concern that surface materials should be both sustainable and accessible. The plan proposes that the National Mall be a role model for sustainability. As stated in the *Draft Environmental Impact Statement* on pages 88, 190, and 514–16, the National Park Service is required to meet green and sustainable standards. A new Executive Order 13514 ("Federal Leadership in Environmental, Energy and Economic Performance") was published as the draft document was being printed, and it has been added to the final document under "Environmental Consequences: Park Operations — Methodology for Impact Analysis."

Comment	Letter 29. Association of the Oldest Inhabitants of The District of Columbia (cont.)	Response

The Association of the Oldest Inhabitants of The District of Columbia

Established Dec. 7, 1865

Summary of Comments by
The Association of the Oldest Inhabitants of the District of Columbia
on the Draft National Mall Plan and EIS

I	❖ Restore, repair & maintain the lawns and grassy areas of the National Mall	I. Please see response B to your letter.
J	❖ Prohibit sports & competitive recreational activities on the National Mall proper; relegate to existing recreation areas in East/West Potomac Park and the Ellipse	J. Please see response B to your letter.
K	❖ Establish a National Mall Visitors' Center utilizing the existing structures of the Arts and Industries Building of the Smithsonian Institution or US Agriculture Department	K. Please see response D to your letter.
L	❖ Limit unsightly/uncoordinated visitor amenity structures (information kiosks, snack bars and restroom facilities)	L. Please see response C to your letter.
M	❖ Provide shaded, seating areas where visitors can find shelter in the summer heat	M. Please see response F to your letter.
N	❖ Replace/improve pedestrian walkways by utilizing 'green,' sustainable walking surfaces (appropriate for wheel chairs/scooters) manufactured from recycled tires or plastic by-products	N. Please see response H to your letter.
O	❖ Provide ample, 'green technology,' non-light polluting illumination	O. Please see response G to your letter.
P	❖ Install an emergency notification/public address system throughout the National Mall to warn visitors of emergencies or severe weather events	P. The plan proposes this action.
Q	❖ Promote and support non-Park Service transportation providers (DC Circulator, Metro Bus, hop-on/off buses, pedi-cabs, tour/charter bus operators) to ensure mobility/transportation along and around the National Mall	Q. A wide variety of transportation modes are already available on the National Mall, and transportation options were the focus of the *Visitor Transportation Study*, which has now been approved. The National Park Service has begun discussions with public transportation providers, such as the DC Circulator.

The Association of the Oldest Inhabitants of the District of Columbia -- the District's oldest civic organization -- was established on December 7, 1865, to preserve memories and matters of historic interest. By virtue of our long presence and participation in the city's prosperity and improvement, we continue to work and strive for the city's stability, security and advancement -- to aid in every way the prosperity and well-being of the District while preserving the heritage of its past.

Comment	Letter 30. Detroit Model Yacht Club (DMYC)	Response
	Frank Vella fvracerone1@aol.com Detroit Model Yacht Club [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	[EDITOR'S NOTE: Comment submitted online.]
A	i woud like to see the instiution of the Mall's pond for recreational and competetive model boat races, perhaps the National Championships.....	A. The plan proposes that a new recreational activity, model boating and rentals, could occur at Constitution Gardens Lake.

Comment	Letter 31. Gold Star Mothers National Monument Foundation, Inc.	Response
	Judith Young <jcyoung83@yahoo.com> 02/13/2010 11:42 AM	[EDITOR'S NOTE: Comment submitted by e-mail.]
A	As Chairman of the Gold Star Mothers National Monument Foundation Inc. I would like to know where a half acre site could be set aside for our Monument. The Foundation currently has a Bill in the House and will be working for one in the Senate. Our Monument project has a dual purpose. One to recognize the sacrifice of America's mothers who have lost their children defending our Country. Second is to educate the public that these mothers not only lose their most precious gift but have donated time, monies and energy in the veterans community. The backbone of our Country has been the strength of woman to raise, educate, nurture, and instill in their children goals more important than life itself. Knowing you received thousands of emails, I would sincerely like to hear from someone in the NPS. Judith Young, Chairman Gold Star Mothers National Monument Foundation Inc. 30 Eraser Road, Moorestown, NJ 08057	A. Your question has been forwarded to the NPS regional office, which will provide you information about the Commemorative Works Act and procedures for proposing memorials. The Commemorative Works Act prohibits any new memorials on the National Mall; however, the National Capital Planning Commission has identified more than 100 sites for memorials and museums throughout the city.

Comment	Letter 32. National Turfgrass Federation	Response
	Kevin Morris kmorris@turfresearch.org National Turfgrass Federation [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")] The National Mall is a treasure that needs to be protected, enhanced and cherished. Sufficient funding needs to be available to develop the appropriate facilities and resources to handle the number of visitors, yet maintain the park at a high level. The Preferred Alternative is the proper vision to accomplish this. [Comment pertaining 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?")]	[EDITOR'S NOTE: Comments submitted online.]
A	We agree that to manage the soils and turf at the Mall, significant renovation needs to first take place. With the level of traffic that the Mall turf receives, this area, especially the main panels from 7th St. to 14th St., need to be designed and maintained the way a high performance athletic field would be. To that end, damage from tents and other cultural events need to be minimized or controlled in the highest traffic areas. This may mean that events on the central panels of the Mall need to be controlled or reduced, to all some level of adequate turf performance. Otherwise, if events and use are not controlled in some manner, the condition of the turf will not improve significantly.	A. We agree that if events and use are not controlled, the condition of the turf will not improve significantly.
	[Comment pertaining to question 3 ("Indicate the extent to which you agree with the description of how the Preferred Alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals.")] We feel that preserving the environmental character and safety of the National Mall is critical. The Preferred Alternative is the only vision that adequately accomplishes this while preserving Freedom of Speech, cultural and historic aspects of the Mall.	

Comment	Letter 32. National Turfgrass Federation (cont.)	Response
	[Comment pertaining to question 4 ("Indicate the extent to which you agree with the comparison of how the alternatives meet the plan objectives laid out in Table 6.")]	
C	Again, the Preferred Alternative vision is the only option to meeting ALL the Plan Objectives. As turfgrass scientists and leaders in the industry, we know that growing turf, and any plant for that matter, requires adequate resources, attention to detail and some the applications of basic biology/agronomy knowledge. The Preferred Alternative is the only option that contains adequate steps and provisions to meeting the objective that is most familiar to our industry, National Resource Protection.	C. We want to thank the National Turfgrass Federation as leaders in the turfgrass industry for supporting the proposed actions related to improved conditions.
	[Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")]	
D	We applaud the National Park Service for their diligence in developing this very comprehensive plan. The Preferred Alternative option of the Plan is what is needed to enhance and protect the National Mall, in all its many facets. As a group and industry, National Turfgrass Federation is most concerned with the conservation of the natural resources. We feel much can be done to preserve those resources, while enhancing the other aspects and not diminishing any aspects. If we can be of service to the National Park Service in any way, our representatives of the turf seed and sod production, irrigation, equipment, golf, landscape, and sports turf industries are willing and able to assist. Thanks for this opportunity to comment. Kevin Morris, President, National Turfgrass Federation	D. Thank you for your offer.

Comment	Letter 33.1. Public Hygiene Lets Us Stay Human	Response
	Carol McCreary phlush@oldtownchinatown.com Public Hygiene Lets Us Stay Human	[EDITOR'S NOTE: Comments submitted online.]
	[Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	
A	Permanent restrooms should be integrated with food and other facilities. Temporary facilities are best kept outside view corridors with landscape to suit.	A. We agree with your recommendation that restrooms should be integrated with food service and other facilities.
	[Comment pertaining 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?")]	
B	Be extremely careful of leaving sites such as Union Square without restrooms. Group unisex stalls around open or landscaped areas with handwashing facilities and drinking fountains. This way families can keep an eye on their youngsters and elders as they safely use the toilets. Make the majority of stalls small enough to "not really comfortable" but efficient because people will not spend much time in them Work for a balance of required privacy and ongoing communication with the street so users do not feel trapped or vulnerable. Of course ADA stalls will be large enough to accommodate wheelchairs, scooters and care attendants. Please consult the PHLUSH Public Restroom Design Principles at www.phlush.org	B. Thank you for recommending public restroom design principles. We will encourage others to visit your website.
	[Comment pertaining to question 3 ("Indicate the extent to which you agree with the description of how the Preferred Alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals.")]	
	Your description of how they compare seems fine. Not sure what input this question requires?	
	[Comment pertaining to question 4 ("Indicate the extent to which you agree with the comparison of how the alternatives meet the plan objectives laid out in Table 6.")]	
	It's clear that new standards of everyday cleanliness and usability as well as programmed maintenance need to be developed to meet the needs of increased numbers of visitors. These standards need to meet the needs of today's diverse society. For example, the standards of open space public restrooms built in the mid-20th century are no longer appropriate. Be sure to do extensive user research to get restroom design right. This is uncharted territory for most architects and planners.	

Comment	Letter 32.1. Public Hygiene Lets Us Stay Human (cont.)	Response
C	[Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")] As the American Restroom Association and Public Hygiene Lets Us Stay Human (PHLUSH) have long advocated, the Mall needs state of the art restroom facilities. This does not mean the elegance of hotel restrooms nor the rusticity of most park restrooms. Mall planners have multiple opportunities to do something really outstanding in restroom design for a considerable range of users and this can reverberate throughout urban America. The working goal of PHLUSH is the following: Cost effective public restrooms that provide maximum function in minimum space and are safe, accessible, available, attractive and easy to keep clean. We hope that the work we are doing will be of use to you and would welcome any opportunity to collaborate. Contact us at www.phlush.org or phlush@oldtownchinatown.com	C. We agree with your statement about the need to carefully consider urban public restrooms for the 21st century.

Comment	Letter 33.2. Public Hygiene Lets Us Stay Human	Response
A	**Public Hygiene Lets Us Stay Human** c/o Old Town Chinatown Neighborhood Association 115 SW Ash Street, #400G Portland, Oregon 97204 phlush@oldtownchinatown.com www.phlush.org Susan Spain, Project Executive The National Mall Plan National Mall & Memorial Parks 900 Ohio Drive, S.W. Washington, DC 20024-2000 Subject: Comments on National Mall Plan Dear Ms. Spain: Thank you for your inquiry following our online comments on the National Mall. Public Hygiene Lets Us Stay Human (PHLUSH) has done considerable research on public restroom design which we feel will be helpful to Mall planners. Please refer to the following: • The Public Restroom Planning section of our website www.phlush.org • "Public Restroom Design for 21st Century US Cities: The PHLUSH Principles" Barbara Lescher. World Toilet Summit, Singapore, Dec 2009. • "Sustainable Design: Case Studies from Portland, Oregon." Carol McCreary. World Toilet Summit, Singapore, Dec 2009. • *Public Toilets for Old Town Chinatown: A Report to the Community*. PHLUSH Feb 7, 2006. • Above three documents may be downloaded at http://public.me.com/carol.mccreary Currently we are collaborating with the International Code Council, the World Toilet Organization and experts worldwide to draft a Global Guideline on Public Toilet Design. The National Mall redesign project will undoubtedly influence the restroom design in open and civic spaces throughout the United States. Therefore, it's important to get it right and to do so with a view to social changes and environmental imperatives. The number of restrooms proposed creates an opportunity to use various approaches for different areas of the mall. We encourage planners to include full-service (attended and heated) restrooms, rows of single-door direct entry unisex stalls, waterless urinals for men and women, and ecosanitation demonstration projects. We would be honored to respond to inquiries from National Mall architects, planners and designers. Best wishes, Carol McCreary Co-Founder Public Hygiene Lets Us Stay Human (PHLUSH) c/o Old Town Chinatown Neighborhood Association 115 SW Ash Street #400G, Portland, OR 97204 503.984.4081 phlush@oldtownchinatown.com http://phlush.org/	A. Thank you for additional links to information that can be used during design.

Comment	Letter 34. Stars Unlimited	Response
A	2010 March 18 From: Daniel J. Costanzo Founder & Public Relations Officer (PRO) Stars Unlimited 900 N. Jacksonville St. Arlington, VA 22205-1326 To: National Park Service (NPS) National Mall Plan National Mall & Memorial Parks 900 Ohio Drive SW Washington, DC 20024 Subject: Comments On The NPS's National Mall Plan Draft Environmental Impact Statement (NMP DEIS) NPS: In order for the NMP DEIS to be complete, it must adequately incorporate the key points listed below. These key points need to be incorporated into the NMP DEIS by incorporating them into its appropriate parts, so as to enhance the National Mall's (NM's) visitor orientation, interpretation, and education opportunities, improve the scope of NM resources, and retain the current scope of NM visitor uses. These key points do not duplicate any points previously made by Stars Unlimited about the NMP DEIS because this is the first – and so far only – time that Stars Unlimited has commented about the NMP DEIS. More specifics about each key point below are available upon request: **1.** The NMP DEIS must officially recognize that the sky is part of the Park, i.e., part of the NM. (And, conversely, it must also recognize that the Park – i.e., the NM – is part of the sky, both figuratively and literally.) For, when the NM is considered in its full extend, the sky comprises fully half of it, the other half being the grounds, monuments, trees, etc., as shown in any image of the NM capturing the view of the viewshed looking down the NM's long axis. Likewise, the NM represents – by far – the largest expanse of open ground offering the most unobstructed view of the sky in the Federal City of Washington, D.C.	A. The sky and unobstructed views are important, and as a planned open space within the federal city, the National Mall does hold a unique relationship to the sky. The National Mall may be one national park that is significantly enjoyed from the air by many visitors landing at Reagan National Airport. On page 14 of the *Draft Environmental Impact Statement* the visibility day and night of the National Mall's architecture and designed landscapes from the sky is listed as a fundamental value. As you note, the National Mall is within an urban environment. Planned façade and commemorative lighting affects one's ability to look at the night sky. Other nontraditional sky watching related opportunities include fireworks celebrations for the National Cherry Blossom Festival, the Fourth of July, and inaugural festivities. See the impact discussion about nighttime character related to the preferred alternative on page 480 in the draft document.

Comment	Letter 34. Stars Unlimited (cont.)	Response
	This means that the NMP DEIS must include the sky (that is, both the daytime sky and the nighttime sky) as one of the Park resources that the public can use by experiencing it on the NM. For example, it is truly inspirational to be outdoors on the NM to witness with unaided eyes a bright, round gibbous Moon floating among the afternoon's clouds above the Capital Dome, or a young, thin crescent Moon bathed in Earthshine hovering next to the Washington Monument in the crisp, clear, and colorful evening twilight. This is especially inspirational after visitors have just stepped outdoors onto the NM after recently exiting the Smithsonian Institution's National Air and Space Museum (SI-NASM) after touching a piece of that very Moon in the form of a Moonrock brought back by America's Apollo astronauts. Similarly, being outdoors on the NM shortly after dark and witnessing with unaided eyes the *International Space Station* (*ISS*) sailing overhead, with the Capital Dome in the background, brings home the fact that it is the American people who pay the taxes, and elect the presidents and legislators so that their elected members in the United States Congress legislating under that Capital Dome approve the money to build that *ISS* and keep her operating in orbit. Likewise, it also is truly inspirational to be outdoors on the NM at night and witness with unaided eyes the planet Mars hovering among the stars above the SI-NASM (or above the Smithsonian Castle), and serving as a beacon calling on America to reach out towards those stars (and pay the taxes to fund doing so) by sailing off on a voyage to Mars in the continuing human adventure of Cosmic Discovery. These are but three examples of how the sky from the NM in both daytime and nighttime is an integral component of the NM's Park resources that fosters the NPS's overall theme of "Experience Your America." Thus, the sky needs to be officially recognized as such in the NMP DEIS.	
B	**2.** The NMP DEIS must officially include outdoor sky watching (astronomy) on the NM as part of the NM's visitor profile, and include it in both the NM's list of appropriate activities comprising the wide spectrum of the NM's recreational and educational opportunities, and within the current scope of visitor uses that NM visitors can participate in. These activities/opportunities need to include both facilitating visitors conducting informal sky watching (astronomy) by themselves, as well as participating in public programs, crafted, organized, and conducted by the NPS, and modeled after the long-running, outdoor, volunteer-led, public sky watching (astronomy) program "Exploring The Sky" that the NPS has conducted for over half a century at the Rock Creek Park (RCP). (This makes "Exploring The Sky" the longest, continuously running public program in the entire National Capital park system.) Conducting these same kinds of public programs on the NM would make them more accessible to a much larger number of visitors because the NM is readily accessible by Metrorail, unlike the NPS's RCP	B. Programs related to sky watching could be developed; however, they do not fall within the primary proposed interpretive themes (see DEIS, p 14).

Comment	Letter 34. Stars Unlimited (cont.)	Response
	Nature Center/Planetarium, where "Exploring The Sky" is conducted. These programs could be crafted, organized, and conducted by the NPS at little additional cost to taxpayers by the NPS's utilizing the resources available at the SI-NASM, and the cadre of expert volunteers available through the SI-NASM. Since the International System of Units (SI Units) is an integral part of understanding the sky (through understanding the space technology, astronomy, and related sciences involved with the sky that they are asked to pay for as taxpayers), the NPS needs to include innovative ways to facilitate educating the American public – particularly citizens in Grades K-12 – about the SU Unit-dominant , competitive, globalized World that they have to deal with. The current SI-NASM outdoor exhibit at the NM's edge, consisting of a scale model of the Solar System ("Voyage – A Journey Through Our Solar System"), is an example of this that is already on the NM (or at least on its edge). The NPS could facilitate this education by making sure that the NMP DEIS incorporates such low cost/no cost (including environmental cost) innovations as constructing walkways to dimensions in SI Units (e.g., make a walkway three meters wide instead of nine feet wide; and putting up an interpretative sign stating so), allowing a temporary SI Unit sculpture garden to be created during the annual Folklife Festival (where sculptures were constructed in SI Unit dimensions), etc. The NPS also needs to incorporate the sky into the Park (i.e., the NM) by taking advantage of the fact that the Washington Monument is inadvertently a giant Sundial by placing completely unobtrusive markers and interpretative signs on the grounds around the Washington Monument. (Apparently, in the 1970s, the NPS allowed a group of artists to temporarily turn the Washington Monument into such a Sundial. This needs to be a permanent feature of the Washington Monument.) This could be incorporated into the Solar Decathlon during the years it is held on the NM. Additionally, this Sundial would also serve a public health role year-round (at almost no cost to taxpayers, except for the initial cost of interpretative markers and signage) by serving as a gigantic educational tool concerning the public health dangers of exposure to being in an environment on the NM of relatively Solar ultraviolet radiation (UV), in an attempt to educate them about skin cancer (the most common cancer; now at epidemic levels), as well as other UV caused health problems (e.g., cataracts). This would recognize the adverse environmental impact to the public from its receiving a great deal of UV exposure while on the NM (particularly around the June Solstice around Local Solar Noon), and encourage that public to take steps to minimize such exposure. The NPS could create such a Sundial through consulting with experts at SI-NASM, and facilitate its public health educational aspects through consulting with experts at local medical research facilities in government and academia, as well as with the American Cancer Society (ACS). **3.** The NMP DEIS must officially both mention and recognize that light pollution is another component of the NM's adversely affected environment, and describe its consequent adverse environmental impacts concerning the NM (e.g., primary impacts, like destruction of the relatively dark sky that originally existed above the NM; secondary impacts, like air pollution over the NM from fossil fueled power plants generating	

Comment	Letter 34. Stars Unlimited (cont.)	Response
C	electricity for wasted lighting causing the light pollution; tertiary impacts, like deaths of migratory birds flying over the NM; and quaternary impacts, like possibly contributing to increases in breast cancer and other adverse human health consequences of "dark deprivation" – both physical and psychological – of MN visitors and residents of surrounding communities). Thus, light pollution must be specifically identified in the NMP DEIS, just like the NMP DEIS does (or should do) for air pollution, water pollution, noise pollution, and other forms of pollution. This means that, just like the NPS does for other forms of pollution, it must also start measuring and tracking light pollution on the NM in a quantitative manner. This now is possible using relatively low cost, digital Sky Quality Meters (SQMs), with the light pollution level measured and quantified in SQM readings of visual magnitudes per square arc-second. A light pollution measurement program could be crafted, organized, and conducted by the NPS, at little additional cost to taxpayers, by the NPS's utilizing the expertise available at the SI-NASM, and the cadre of expert volunteers available through the SI-NASM. This A light pollution monitoring program could be augmented – and the public involved – (again, at almost no additional cost to taxpayers) through use of volunteers in citizen-science programs, such as – but not limited to – the Citizen Sky program of the American Association of Variable Star Observers (AAVSO), Globe at Night Program, and Dark Skies Rangers Program. Light pollution also must be both incorporated into, and prominently featured in, the NM's orientation, interpretation, and education programs. The above-mentioned "Exploring The Sky"-type public programs are the best mechanism for doing so. **4.** The NMP DEIS must incorporate the light pollution avoidance and abatement recommendations of the International Dark-Sky Association (IDA) as a specific, clearly identified component of all the NM's outdoor lighting policies and practices for all current lighting (including through retrofitting existing lighting) and future outdoor lighting on the NM and – if possible – surrounding areas, which will not compromise safety, security, and utility (compromising them is not a problem as the light at issue is wasted light). The IDA can put the NPS in touch with knowledgeable experts to assist it in meeting this need at little or no additional cost to taxpayers. And the NPS (or at least parts of it) have already consulted with IDA about other parts of the National Park system. This the light pollution avoidance and abatement effort also must include the NPS annually publishing the amount of energy saved (in "negawatt"-hours), Global Warming carbon not spewed into the atmosphere, nuclear waste not generated, and taxpayer money saved by following these policies and practices. This effort also needs to include the NPS's encouraging surrounding facilities and communities around the NM to control their light pollution trespassing into the MN's viewshed, particularly through shielding all fixed outdoor lights otherwise directly visible from within that viewshed.	C. The need for visitors to appreciate the beauty of the National Mall at night is included in the plan objectives (DEIS, pp. 4 and 142). The plan proposes that the National Mall be a role model for sustainability, and reducing light pollution is related to that goal. The NPS *Management Policies 2006* also address lightscape management (NPS 2006b, sec. 4.10).

Comment	Letter 34. Stars Unlimited (cont.)	Response

Under normal circumstances, while it clearly is not possible to achieve a truly light pollution-free dark sky above the NM, much can be done by the NPS to minimize light pollution using quality lighting technology and engineering. In fact, the NPS has an opportunity here that turn its NMP DEIS for "the Nation's Front Yard" into a model for incorporating light pollution avoidance and abatement practices as an integral component of general management plans and environmental impact statements for local, state, and national parks throughout the Nation, and around the World, while at the same time saving taxpayers money.

The NPS must take advantage of this opportunity and make it so.

Sincerely,

-- Daniel J. Costanzo
Founder & Public Relations Officer (PRO)
Stars Unlimited

Acronyms & Abbreviations Used In These Comments:

AAVSO – American Association of Variable Star Observers

ACS – American Cancer Society

DEIS – Draft Environmental Impact Statement

IDA – International Dark-Sky Association

ISS – International Space Station

NM – National Mall ("the Park")

NMP – The National Mall Plan

NPS – National Park Service

PRO – Public Relations Officer

RCP – Rock Creek Park

SI-NASM – The Smithsonian Institution's National Air and Space Museum

SI Units - The International System of Units

SQM – Sky Quality Meter

UV – Solar ultraviolet radiation

Comment	Letter 35. University of Colorado	Response
	Jack DeBell debell@colorado.edu University of Colorado	[EDITOR'S NOTE: Comments submitted online.]
	[Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	
	I agree with the overall Preferred Alternative Vision because it seems to most thoroughly satisfy the goals of the National Environmental Policy Act.	
	[Comment pertaining to question 3 ("Indicate the extent to which you agree with the description of how the Preferred Alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals.")]	
	More than the other alternatives, the Preferred Alternative more fully enhances the quality of renewable resources and approaches the maximum attainable recycling.	
	[Comment pertaining to question 5 ("Do you agree with the actions common to all alternatives?")]	
	It is important that actions toward improving waste reduction and recycling remain common to all alternatives. (Citation: Actions Common to All Alternatives including Park Operations: "Make waste management more efficient; expand recycling at events, page 77)	
	[Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")]	
A	I appreciate the opportunity to provide comments on several aspects of the National Mall Plan including waste reduction and recycling. My comments are abbreviated from previous meetings I have attended and presentations I have made at the request of the US EPA, National Park Service, and the Washington DC Public Works Department. In summary, my comments focus on the need to:	A. We appreciate the fact that several years ago the U.S. Environmental Protection Agency brought you into discussions about recycling and solid waste management as a respected leader in the field. The insight provided by lessons learned at the University of Colorado has been invaluable to the National Mall. We also appreciate that you have put your commitment and expertise into action by repeatedly volunteering on the National Mall, giving you a realistic sense of the challenges.
B	1) move ahead rapidly to study and implement cost-effective, code-compliant, and convenient, waste management and recycling systems. This study should recognize the need for the variety of concession operations and other large generators of solid waste to take more active responsibility than in the past for funding, promoting, and actively participating in waste reduction, recycling, and disposal activities.	B. Your comments on the National Mall plan are helpful. While the plan deals at a vision level with the topic, park staff have been moving ahead with cost-effective, code-compliant, and convenient waste management and recycling programs.
C	2) issue standards as soon as possible for waste reduction, recycling, composting, and solid waste management to set reasonable expectations and apportion roles and responsibilities in ways that increase understanding and proper participation among National Park Service departments, contracted vendors, concessionaires, and organizers of events and demonstrations. These standards should, at a minimum, include detail on the type(s) of proper recycling containers and their placement. These standards should endeavor to reach parity with the number, placement, and capacity of trash containers.	C. Your suggestions are compatible with NPS policy and recent executive orders related to waste reduction, recycling, composting, and solid waste management.
D	3) restrict private company presence on the National Mall. If the private sector participates in funding, operating, or promoting improved programs, that these private entities are recognized but are restricted from promoting themselves in overt, visible ways which "commercialize" their presence on the National Mall.	D. There are limits on commercial advertising and promotion related to this area.
E	4) oversee private operations. If the private sector provides operational service for collecting recyclables and trash from the Mall, that these services be awarded through a competitive bidding process with clear roles and responsibilities in a fixed duration contract with opportunities for public review as part of any renewal or extension process.	E. Any contracted services need to be awarded through processes that do include competitive bidding and durations.
F	5) reduce soil compaction, water use/irrigation requirements, and improve soil tilth by amending soils with appropriate grades and quantities of compost.	F. We agree that soil compaction needs to be reduced, and that composting and/or other amendments can be useful.
G	6) continue to educate and increasingly mandate sustainable and low-impact events. This might require revisions to event permits, concession contracts, and improved educational information. I would also comment that improvements for waste reduction, recycling, composting, and solid waste management remain included in any of the alternatives considered and that the agency's preferred alternative is most advantageous for prompt and thorough implementation of these improvements.	G. We agree that education about waste reduction, recycling, and composting is essential. The National Park Service has participated in local and regional discussions about recycling, where all agencies agreed on the importance of consistent, coordinated educational messages to the long-term success of the programs.

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INDIVIDUALS

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	Comments pertaining to question 1: "Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall." [The number in brackets at the end of a comment is only for tracking purposes to ensure that every substantive comment has been addressed.]	
	I like how the plan aims to make Union Square more of a focal point. The Grant statue is one of the most beautiful but overlooked monuments in the city, and the reflecting pool in front of it is not the best use of that space. I like the idea of either making the pool smaller or even eliminating it altogether. [20100103095448]	
	I like how the mall is being kept more as it is not. I would make the whole capital reflection pool drainable for large gatherings. [20100103193723]	
A	Keeping the natural state of the National Mall is important, but it never hurts to make a few changes. I believe though that there should be more areas, such as bricked-in sitting areas with built-in landscaping options, so plants and trees can be changed, depending on longevity, etc. I believe benches would only attract some of the homeless. Everybody can't sit down on the ground, because of physical challenges, elderly, etc. [20100104121801]	A. A number of improvements to visitor amenities are proposed. The goal of universal access is to recognize that the National Mall is a location where everyone, regardless of ability, should be able to visit, enjoy, participate in activities, sightsee, and demonstrate.
B	Take NO-ACTION. If it's not broke, don't "fix" it. I somehow feel that this is all a subversive measure to stifle FREE SPEECH. We don't have to have grass growing everywhere. News alert - when it rains, there is mud. Big deal. Mud will not suppress FREE SPEECH, but I think the Trust for the National Mall might be trying to. [20100104160503]	B. As stated in the *Draft Environmental Impact Statement* (pp. 3, 20–30), the National Mall — the home to the great symbols of our nation — was not designed for the level of use it receives, and many facilities and much of its infrastructure are aging. When planning began in 2006, the National Park Service had identified a backlog of deferred maintenance of around $450 million.
C	I believe the Preferred Plan will enhance the experience for all visitors, including my mother who is wheelchair dependent. [20100106185948]	C. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."
D	While I understand the need to restore the Mall and make improvements, too many of the suggestions within the plan threaten the historical nature of the Mall and in some cases will drastically alter it's current character. [20100107100634]	D. The National Mall will continue to change and evolve, reflecting the history of our country. Despite landmark plans for Washington, D.C., it was clear by the beginning of the 21st century that the National Mall was never designed for present levels of civic use, tourism, recreation, and cultural activities.
E	My main concern is cost. The expense may be into the hundreds of millions, according to some estimates. With the city and national budget in bad shape, bad idea. Some things might be done on the cheap. E.g., I've heard out-of-town friends complain about lack of food and restrooms on the Mall. Could contract such services out to food vendors and portapotty firms with little budget burden. Grass does get destroyed sometimes from overuse; need to keep fencing off scruffed areas at times. This work could be contracted out too. (Mall museums might be opened up at night as in past through fee charged night-time visitors.) Re tri-related stuff, would like to see the running paths kept open, instead of forcing runners onto streets as sometimes happens. Running past moonlit monuments is one of city's best athletic experiences. [20100107120059]	E. The plan proposes developing a palette of paving materials to meet a variety of uses, including running.
F	The key issues for me are sustainable use and pedestrian-friendly access for all citizens and visitors. Annual use of the Mall for the SolarFest and the 4th of July, for example, is a top priority for me. The NPS can do a better job of providing recycling guidance and containers, especially for large public events. [20100108120338]	F. We agree.
	The mall is a representation of who and what we are as a people. It should be welcoming, green, and accessible. Shoring up the sea wall, greening the mall, even allowing more commercial opportunities are all good things as the net result is more comfort and accessibility. [20100110180153]	
	I prefer option C. It is my opinion that the National Mall should be a retreat from the urban landscape and provide as much recreation as possible. [20100117155332]	
G	What I disagree with specifically is the policy that appears to be consistent in all the alternatives to continue using the Mall as it has been in recent years for so-called 1st Amendment activities. The National Mall is America's front yard, not some backwater fairground. Its use as a staging ground	G. The preferred alternative emphasizes sustainable uses for First Amendment demonstrations or gatherings, as well as national celebrations.

Comment	Letter 36. Anonymous Comments Online — Question 1 (40 Individual Comments)	Response
	for tens of thousands of people to trample upon should be restricted to infrequent events, like holiday celebrations (4th of July), presidential inaugurations, and other events of that magnitude. I grew up in the area and remember the green grass stretching from the Capitol to the Washington Monument. I recently moved back and took my family down to the museums. I was disgusted by what greeted us. Dirt and dead grass everywhere. Yes, I know it's winter, but there were patches of green grass that were fenced off, so I know it's possible to make it look nice. As of now though, it's a national embarassment. [20100127160530] During the worst economic situation in modern times we cannot afford to be spending any money on unnecessary expenses. Leave the Mall the way it currently is. [20100128221310] February 8, 2010 National Park Service U.S. Department of the Interior Washington, D.C. Dear Decision Makers: National Mall Refurbishment Plan, I work as a schoolteacher in Chesterfield County, Virginia. For over twenty years now, near the end of each March, we bring our 8th graders to Washington, D.C., for their 8th grade field trip. The students tour various museums and monuments, and have a bus tour of government buildings. Weather permitting, we have a picnic on the Mall. The past few years it seems to me that the public grounds around the Mall and the Monuments have greatly deteriorated. For example, along the Mall and also at the Reflecting Pool near Lincoln Memorial, there are a lot of muddy areas (due to foot traffic) where grass should be growing. This general deterioration saddens me. It seems to me that a nation should have beautiful public areas in it's nation's capitol. I presume that the deterioration is due to Republican/ Bush-Era strategies to defund Federal agencies, therefore weakening them. I remember hearing perhaps a year ago about ideas to refurbish these public areas in D.C.. It seems to me like a very good idea. Refurbishing these areas would put people to work, and it would not only repair damage caused by general wear-and-tear the past many years, but new designs and structures could make these areas really "world class"! So, I write during this public comment period to say that refurbishment of our national Mall and Monuments' areas has my hearty support. I've read that there is "No Action" alternative, which would continue the current management plan. It seems to	
H	me that, due to disrepair and the need for redesign, much more than "No Action" is needed at this time. It seems to me that we need to be able to safely handle large numbers of citizens for public demonstrations, concerts and presidential inaugurations, etc. We need recreation areas (frisbee,	H. We agree with the need to safely accommodate large numbers of people.
I	soccer, softball, etc.) with many drinking water fountains and restrooms. We need attractive snack shops for tourists visiting museums and monuments, shady areas for them to cool-off, and pretty water fountains. We need areas for education (e.g., Park Ranger programs about the historic monuments). It seems there should be a lot of flower gardens, and solid-surface footpaths,	I. The plan proposes a better distribution of visitor facilities.
J	everything accessible for people with challenges, of course. Signage could be written in Braille, also, so people without sight would feel included. Lots of restrooms !!! Perhaps lots of plaques about rights and responsibilities of U.S. citizenship, to serve an educational function. I certainly hope that a Mall Improvement Plan is implemented. As I said, it would provide people with jobs; repair, maintain and beautify our Mall and Monuments Areas; and return to it to "world-class" status for the 21st Century. I do thank you for your work towards this end. With my warmest regards for The National Park Service. [20100208182535]	J. New educational programs include excerpts from Franklin Delano Roosevelt's fireside chats and Martin Luther King Jr.'s "I Have a Dream" speech, more program listings, and a new brochure entitled *The First Amendment on the National Mall*.
	We need to keep our heritage but we also need to be able to give the public access to their nation's capitol. The plan is far-reaching but necessary. [20100212113631] Having been to the Mall and walked it often, it is great need of multiple repairs as noted in the Draft Impact Statement. [20100216230343]	
K	We are in a great recession. Cost for such a project at this juncture in time is not justified UNLESS funds will be by private donations. The lawn should be replaced with artifical turf such as is used in ball parks. [20100217143004]	K. Your comment has been noted. The National Park Service has received many private donations, and The Trust for the National Mall is the authorized fund-raising partner. We have explored using artificial turf, but it does not meet the criteria for durability, maintainability, and sustainability. Artificial turf is hotter than natural turf, and it does not meet objectives to improve water infiltration. We will continue to examine the use of new technologies to increase durability in natural turf. This topic has been added to the considered but dismissed section for the following reasons: technical infeasibility, inability to meet project objectives, and duplication of other less damaging alternatives.

Comment	Letter 36. Anonymous Comments Online — Question 1 (40 Individual Comments)	Response
	A Mall "revision" is a MUST. Update is necessary.... [20100217151329]	
L	I would like to see the Smithsonian Castle and Smithsonian Arts Industries Buildings remain where they are currently locating and be refurbished. [20100217151520]	L. These facilities are managed by the Smithsonian Institution, which has started repair and preservation work in the Arts and Industries Building.
M	Cut down the trees, dig up the grass and use concrete to replace it! If people are going to use it so much, make it friendly for the purposes intended. It was fine in the days of Washington, but those days are gone. Pave the whole mess and quit worrying about the grass. [20100217153815]	M. The preferred alternative proposes increased paving to accommodate the level of use and to protect the historic landscape and views; however, the broad green lawns have become historically significant.
	Leave the mall alone. The only way to keep the grass green and beautiful is to keep the people (to whom the mall belongs). It is ours to fly kites, picnic, throw a blanket and enjoy a good book. Most of all it is our gathering point and the grass means nothing at all. [20100217154138]	
N	instead of wasting tax payers money let the high paying CEOS and high paying officials donate their money to the cause.... they use our tax dollars and waste it... or have the people visiting pay a greens fee like the golfers do!!!!!!!!!!! [20100217154721]	N. Public law stipulates that no fees may be charged for any unit of the national park system in Washington, D.C. (16 USC 6802).
	Beautification is asthetically appealing, but due to our internal economic strife, taking funds that should go toward other internal humanitarian projects should take priority. The Park Service like alot others, should have been wiser over the years in protecting the Mall area. Again, it shows how our "Mental Midgets" are again controlling the purse strings. Shame on the those who should have had enough sense to have contingencies in place. Take funds directly from a bureaucrats pockets, how see how easily they would want to spend. How many times do well allow the "tax payer's" well to be drained? [20100217162338]	
	We really need to refocus our efforts on what is REALLY important for our Nation's vision, and it certainly isn't the Mall. Take the money you envision spending, which is wasteful and NOT what taxpayers really WANT or NEED and help our struggling US Citizens, our Economy, our US Citizens who can't afford to pay a medical bill. Just reassess what our real issues are and stop dressing up dirt and grass. Who honestly cares if it grows or doesn't grow. Unless you plan on blocking off this often walked-on land, anything you envision will just be a waste of millions of dollars that could really be best served somewhere else. Thank you. [20100217164218]	
O	I dont think we should be spending money that we don't have! I would wait untill we can afford it. Has anyone thought about using synthetic grass that looks like real grass, and it requires no maintenance. [20100217165806]	O. Regarding artificial turf, please see response K above.
	I Belive the grass on the mall should only be used during large events. the rest of the time it's "KEEP OF THE GRASS". [20100217170052]	
	The mall is large althought it is beautiful and sends a semi-message of our nations power, it is enlargely wasted property... cut down the back end and remodel to a historical venue that generates cash for our nation to benifit all up keep of our nations monuments in the D.C. area... [20100217171408]	
	Save money. Nothing should be done until we (United States) is out of debt. The national mall should reflect the state of our country and right now we are poor and in debt. There should be no upkeep until our national debt is retired and we start living within our means. [20100217172235]	
	If Congress can come up with nearly $100 billion to "bail out" AIG, they can come up with more than $36 million to repair, preserve, and improve a national landmark. [20100217173047]	
	i fell it just should be kept up. put spriklers and replace sod when needed if all fails put green color spray till you can replace it. so what disney theme parks do. there's no excuse. [20100217180322]	
	Obviously the socio-historical-economic-political timeline of the United States of America is witnessed there. Sometimes very passionately, sometimes very softly. [20100217182654]	
P	Keep the gravel, no concrete, asphalt. No commercialization, just a few snack stands, a few	P. Please see response to 8D, as well as the discussion of gravel walkways under "Summary of Comments and Responses," beginning on page 12.

Comment	Letter 36. Anonymous Comments Online — Question 1 (40 Individual Comments)	Response
	restrooms added. No sit down restaurant. There are plenty elsewhere. Keep grant statue the way it is, just fix the pavers that are loose. Can plant a few replacement trees for the elms. Keep union sqare and reflecting pool the same size as before. [20100219075950]	
Q R	My family and I spent 9 days in Washington DC during June 2009. I loved the city. we stayed in the Smithsonians and walked the mall from one end to the other. My biggest disappointment was the reflecting pool at the Lincoln Memorial! It was nasty, ducks all in it, and it smelt AWFUL! I didn't even take a picture of it. If you are gana spend money I would definately clean out the pools and put a filtration system or something on them I would not touch the grass! What really sold me on the Mall was the way people used it. every where we went there was a softball game or soccer or people running or just setting and reading. I wouldnt waste our money on trying to get that to look fancy for someone's only time to the DC because all the people who lived there used it. America is NOT some fancy, manicured, dont touch place. If you go to putting in some restaurants and souvenier shops you will loose the historical feel of the place and turn it into a commercial retail center. the train depot is a great place to go eat if someone wants to eat. Clean up the water, preserve the monuments from corrosion and deterioration but don't waste our money on the fancy upgrading looks of the place! And I never had a problem in finding a bathroom. And I have two children. Thanks - disappointed in Alabama. [20100219091936]	Q. We too have been concerned about water quality in large pools because of the lack of filtration or recirculation. As explained in the *Draft Environmental Impact Statement* (pp. vi and 20), the Lincoln Memorial Reflecting Pool will be rehabilitated as a separate project, and improved water quality will be one result. R. As you point out, the National Mall is very well used for a variety of purposes. Many people enjoy playing in the shadow of great American symbols.
S T	If you are contemplating changing the walkways from gravel, there are now many pervious materials to choose from. For future plantings, how about choosing plants native to the region? Modern bicycle parking racks are a must. I think a bathroom by the Smithsonian Metro stop would be a very good idea. The elms are beloved, but if their care is too expensive, consider replacing them with trees (hopefully native) that aren't susceptible to disease and can tolerate the inevitable foot traffic. [20100220062504]	S. There are more pervious materials today and there are many different ways to accomplish more sustainable walks and water use. Also see response 8D and the discussion of gravel walkways under "Summary of Comments and Responses," beginning on page 12. T. It has been the National Park Service's experience that native elms are generally quite tolerant, and a disease-resistant strain has been developed.
U	I am for a plan that improves and expands the features of Mall and unifies the Mall into a comprehensive pedestrian friendly area. In particularly, I support the improvements to the sand volleyball court area. The nets and courts are in need of repairs and upgrades. More sand is needed on the courts and new, more modern drainage system. The area is a great place for locals and visitors to hang out and mingle and enjoy the park beyond the Monuments. [20100221150700]	U. Descriptions about improvements for the volleyball area have been updated.
V	While I do agree that the Mall needs to be upgraded, please do not take away the gravel paths! It is my favorite running spot and it adds a natural beauty to the space - not another concrete jungles like New York! [20100221150938]	V. Please see response 8D about gravel paths, as well as the discussion of gravel walkways under "Summary of Comments and Responses," beginning on page 12. You may be interested to know the gravel surfacing can be as hard and impervious as concrete.
W	The Park Service should be applauded with recognizing that the Mall area is utilized by local residents and visitors for recreation, including flag football, rugby, volleyball, ultimate frisbee, softball and kickball. While it is true, that many of the users bring their own equipment, some recreational facilities cannot be supplied by the participants which would include rugby goalposts and sand volleyball courts. As a frequent user of the volleyball courts in the western end of the Mall (the area bounded by Rock Creek Parkway and Northwest Parkway Drive), the courts are in terrible shape. I strongly endorse and support the preferred alternative including its recognition on page 143 of the need to improve the conditions of the volleyball courts. That also will improve the functioning of the bicycle path that bisects the area where the courts are located. In carrying out such changes, the Park Service mentioned the possibility of including water misters to cool individuals. Given the fact that many bicyclists and runners use the area near the volleyball courts to take a break, the misters would be utilized by a variety of recreational users of the Mall. The Park Service also should ensure that a water fountain is located in the area to ensure that volleyball players, bicyclists, runners, etc. do not have to go to the Lincoln Memorial for a drinking fountain. The Service also should probably ensure the placement, beginning at the commencement of daylight savings time for a portable toiler facility in the area since bicyclists and volleyball players could use that facility. [20100222180406]	W. Descriptions about improvements for the volleyball area have been updated.
X	There is absolutely nothing wrong with the Mall. I have been there many times and I must say, things seem to be done for the benefit of Marriott, like building kisoks and so forth that they seel souvenirs from. They are too in-bed with the park Service, so I smell a rat. I can see from the plans that this would greatly benefit Marriott vendors. Aside from that, we Americans are tightening our belts...why can't you do so? It ODES NOT COST that many hundreds of millions of dollars to polish	X. Marriott is not a vendor on the National Mall.

Comment	Letter 36. Anonymous Comments Online — Question 1 (40 Individual Comments)	Response
	a few statues and dig up soil and aerate it. Get a few rented rototillers and let the park SErvice employees do the work. They do a great job arund the White House. I suspect that "renovating" an area down by the Lincoln Memorial for the purpose of enhancing demonstrations is simply a ploy to move them awway from the Supreme Court and Capitol Building. Can't you find a better use for your budget money than wasting it on these plans? How about producing some jobs that provide more parking palces for tourists and filling in pot holes? That is what our taxes should be paying for. SERVICES to the public. Thes so-called beautification projects are cover ups for the Park Service's own failure to think creatively and caringly with OUR MONEY in this economy. THE MALL IS FINE LIKE IT IS ...we are in a darn depression. Get over the spending addiction. COLD TURKEY. [20100223121907] [EDITOR'S NOTE: Similar responses to questions 2, 3, and 6.]	
	In my several visits to the Mall I was disappointed in its condition. The grass was brown and the lawns were trampled to a hard pack condition. Also, it was decidedly unparklike in its flat, unfeatured design. It desperately needs renovation. [20100223131101]	
Y	A commendable job on the committees. Have only one interjection: Please support the move to include WWI veterans somehwere in this great Memorial. Keep up the the good work; the rest of the world is watching. [20100224003414]	Y. As explained in the *Draft Environmental Impact Statement* (pp. vi and 20), the D.C. War Memorial is being restored as a separate project.
	I have lived in the DC area since 62 and the grounds look like there has been little money put into it since my arrival. There are so many people who come here to see our Nations Capitol and it's awful that they see the conditions that our sites are in.... please add seating, its a very restful place to sit. Please put in some grass, and flowers... bushes would be nice... clean the monuments... and the tidal basin sidewalk, need I say more... This isn't Brain Surgery... spend a little money and fix it up. My son and I will go there reguardless, but its embarassing when folks come in and see the conditions... they do remark. Grass, fertilizer, flowers, bushes, safe walking paths, and some seating for those visiting that have difficulty making it from monument to monument... you know so they don't have to "stand in line" just to sit down. [20100304171037]	

Comment	Letter 37. Anonymous Comments Online — Question 2 (13 Individual Comments)	Response
	[Comment pertaining 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?")]	
	Again, the focus should revolve around enhancing civic participation and making the mall pedestrian friendly and accessible. All amenities, including food, playgrounds, new benches and redesigned sidewalks shoud contribute to this. [20100102145111]	
A	I am particularly concerned with the plan to pave the gravel sidewalks. This would be a terrible decision and in no way should be pursued. The gravel has numerous benefits: It is beneficial for commuters, walkers and joggers; it supports perception and feeling of the space as a park and not just a city sidewalk; and it is easy to maintain in the winter (if you pave it, the park service is goign to have to come out routinely in the winter and shovel and salt the ENTIRE MALL to keep people from slipping and falling). PLEASE DO NOT PAVE THE GRAVEL!!!!!!! I have many reservations about altering the reflecting pool. there is more than enough space around the capitol for demonstrations, etc. I have never, ever been to the capitol at a time when more standing room was needed.	A. Please see response 8D about gravel paths, as well as the discussion of gravel walkways under "Summary of Comments and Responses," beginning on page 12.
B	Additional, this greatly threatens the historical nature of the space. Please do not detract from Pierre L'Enfant's original vision for our city. It was specifically chosen by GEORGE WASHINGTON himself and I believe we should honor that vision. Lastly, I strongly disagree with any efforts to discourage	B. Gravel dates from the 1970s, not from the George Washington era, and it replaced concrete walks. In the 1930s four parallel asphalt roadways had adjacent concrete paved walkways.
C	events or demonstrations from taking place on the Mall (or in any other part of d.c.). this is the NATION'S CAPITOL and it's very essence is to host those type of events. that is our responsibility as americans. And it is my responsibility as a D.C. resident to discourage the Park Service from doing anything that would rob this city of the character that makes it so incredibly special. [20100107100634]	C. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18).
	The National Mall is a remarkable resource, and NPS does a fine job of oversight and protection for future generations of Americans. This plan shows an enormous amount of excellent planning and thinking. I support most of it. Thanks. [20100108120338]	

Comment	Letter 37. Anonymous Comments Online — Question 2 (13 Individual Comments)	Response
	The people who came up with this plan did so after months and months of research, debate, and thought. Why in the world would I, who have been to the mall only three times in my life, think I could do better. We asked these people to come up with the best plan they could, I think we should trust that they did. [20100110180153]	
D	Please, do not pave the gravel walkways. One of my favorite things about the national mall is the gravel. It's perfect. [20100117155332]	D. Please see response 8D, as well as the discussion of gravel walkways under "Summary of Comments and Responses," beginning on page 12.
	The federal deficite needs to be reduced by eliminating excessive spending like this. This is what was said in President Obama's State of the Union Speech. [20100128221310]	
	It seems like a comprehensive plan at best. [20100212113631]	
	Cost. At this juncture in time it is not in my opinion a cost that the tax payer should need to pay for. [20100217143004]	
	We have a government who is just worried about the facade of our capital we should set our sites on more important issues.... our seniors and disabled people did even get an increase with the COLA this year but the prices with the cost of living medication and insurance still rose for those people now they are debating on food or paying their insurance or heat or electric how about getting to the issues that are important istead of wasting time socializing with other governments and take care of the PEOPLE in our own country [20100217154721]	
	Waste of tax dollars. Our Country is at its worst time right now and only getting worse. [20100217164218]	
	As it is in disrepair so is the country. When we return to solvency we can send as much as you would like. [20100217172235]	
E	Moving demonstrations away from the Mall sounds a lot like an attempt to control free expression. [20100217173047]	E. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18).
	It needs it.... the public is not blind. [20100304171037]	

Comment	Letter 38. Anonymous Comments Online — Question 3 (9 Individual Comments)	Response
	Comments pertaining to question 3: Indicate the extent to which you agree with the description of how the Preferred Alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals.	
	I think using non-potable water for the water displays is a common-sense, why-didn't-we-think-of-this-earlier idea. There is no reason to waste drinking water! [20100103095448]	
	I particularly like the walkway and restroom improvements that create easier access for wheelchair users. [20100106185948]	
	My main concern is cost. The expense may be into the hundreds of millions, according to some estimates. With the city and national budget in bad shape, bad idea. Some things might be done on the cheap. E.g., I've heard out-of-town friends complain about lack of food and restrooms on the Mall. Could contract such services out to food vendors and portapotty firms with little budget burden. Grass does get destroyed sometimes from overuse; need to keep fencing off scruffed areas at times. This work could be contracted out too. (Mall museums might be opened up at night as in past through fee charged night-time visitors.) Re tri-related stuff, would like to see the running paths kept open, instead of forcing runners onto streets as sometimes happens. Running past moonlit monuments is one of city's best athletic experiences. [20100107120059]	

Comment	Letter 38. Anonymous Comments Online — Question 3 (9 Individual Comments)	Response
	It covers all the necessary aspects. [20100212113631]	
	The Draft Plan seems to take every avenue possible to protect the environment, which is much more than is being done now. Whether it's the Eagles or the Sturgeons, the grass, the lack of water circulation, it seems the plan has been looked at from many angles and has attempted a comprehensive umbrella type plan to begin to correct all the many problems that the Mall suffers from. [20100216230343]	
A	The term "Vision" here is so ambiguous. A visionary looks beyond. You're formulating ideas based on a "reactionary" process. [20100217162338]	A. The purpose of NPS vision plans is to provide a coordinated and comprehensive written program for future action to protect America's national parks, and they are prepared with public involvement and environmental analysis in accordance with the National Environmental Policy Act. The proposed plan provides a cohesive guideline for future management by addressing physical development needs as well as resource protection, the civic forum, circulation, visitor enjoyment, and park operations. The plan presents a vision for the entire National Mall that is consistent with other vision plans for this area, such as the NCPC *Extending the Legacy* (1997), the *Center City Action Agenda* (District of Columbia 2008), the NCPC *Memorials and Museums Master Plan* (2001), and the NCPC *Monumental Core Framework Plan* (2009).
B	this is a specific site related to all Americans. Besides the environmental aspects other aspects are just as important-- the part I will call the American Experience--leave it out the mall would be just a place where events were held-- no correlation as to why at the Mall. also access to all-- the disabled, those physically challenged yes, but also inclusive for all americans: mentally/ emotionally challenges soldiers who have returned from battle with both physical and/or emotional wounds. Please don't forget this piece of land in our nation's capital is where most americans would agree that we (despite our varied backgrounds) recognize that we are a people. (pardon me if I become passionate about it I am a lifetime student of history, government, and economics. every time I hear the speech "I Have A Dream" I dream that small strip of land with all its history and all it's emotion. [20100217182654]	B. The planning focus has been on enriching the American experience. We agree that access for all and inclusiveness are important.
	It meets most of my concerns about the condition of the mall. I do think that basic elements of LaFont's design should be preserved, but I would like to see less abuse of the lawn areas by confining large demonstrations primarily to the paved walkways, and by landscaping the lawn areas to a low but gently rolling terrain rather than a featureless flat area. This should be done to encourage pedestrians to remain on the walkways, but not to the extent that detracts from the openness of the expanse or obscures views of the memorials and public buildings. Lawns should also be better maintained. [20100223131101]	

Comment	Letter 39. Anonymous Comments Online — Question 4 (7 Individual Comments)	Response
	Comments pertaining to question 4: "Indicate the extent to which you agree with the comparison of how the alternatives meet the plan objectives laid out in Table 6."	
A	Thank you for not forgetting the history! Educational panels placed throughout the Mall walking area would be welcome. There have been so many key events and demonstrations in the area, not to mention the key role that such demonstrations play in our politics, and it would be wonderful to be able to learn about them. [20100103095448]	A. A new brochure entitled *The First Amendment on the National Mall* was published in April 2010 and is available on the National Mall. It highlights key sites for freedom of speech and includes cell phone tour call-in numbers at six locations.
	My main concern is cost. The expense may be into the hundreds of millions, according to some estimates. With the city and national budget in bad shape, bad idea. Some things might be done on the cheap. E.g., I've heard out-of-town friends complain about lack of food and restrooms on the Mall. Could contract such services out to food vendors and portapotty firms with little budget burden. Grass does get destroyed sometimes from overuse; need to keep fencing off scruffed areas at times. This work could be contracted out too. (Mall museums might be opened up at night as in past through fee charged night-time visitors.) Re tri-related stuff, would like to see the running paths kept open, instead of forcing runners onto streets as sometimes happens. Running past moonlit monuments is one of city's best athletic experiences. [20100107120059]	
	This is a realistic approach to a difficult problem. [20100212113631]	
	leave it the way it is. [20100215013149]	
	It seems they have 5 different plans from basic changes to more or less maintain the park to a robust plan the preferred alternative which would no doubt cost more and take years but make the whole park area fit for the 21st century. [20100216230343]	

Comment	Letter 39. Anonymous Comments Online — Question 4 (7 Individual Comments)	Response
	Your approach has alot to be desired. Whatever "think-tank" came up with this recipe, ought to be bottled and sold outside our borders. [20100217162338] Love the underground parking in one of the alternative plans [20100221200043] You are the ones with the enough money to think it through. [20100223121907]	

Comment	Letter 40. Anonymous Comments Online — Question 5 (4 Individual Comments)	Response
	Comments pertaining to question 5: "Do you agree with the actions common to all alternatives?" Alternatives BC do a good job of integrating the National Mall back into the city. This is necessary in order to improve the pedestrian feel of the Mall, but also will contribute positively to the economoic growth of the city. [20100102145111] My main concern is cost. The expense may be into the hundreds of millions, according to some estimates. With the city and national budget in bad shape, bad idea. Some things might be done on the cheap. E.g., I've heard out-of-town friends complain about lack of food and restrooms on the Mall. Could contract such services out to food vendors and portapotty firms with little budget burden. Grass does get destroyed sometimes from overuse; need to keep fencing off scruffed areas at times. This work could be contracted out too. (Mall museums might be opened up at night as in past through fee charged night-time visitors.) Re tri-related stuff, would like to see the running paths kept open, instead of forcing runners onto streets as sometimes happens. Running past moonlit monuments is one of city's best athletic experiences. [20100107120059] Yes, they are much needed and long overdue. Particularly revitalizing the turf and increasing, more careful location of large events to minimize long-term impact - but not preventing, limiting or restricting them! [20100108121626] I want the gravel to remain. [20100117155332] All the actions seem logical and comprehensive to meet all the future needs of the mall. [20100212113631] It seems most of the alternatives are similar, just less robust than the preferred alternative. [20100216230343] Ever hear of the expression, "You can fool some of the people some of the time, but cannot fool all the people all the time." [20100217162338] No money to pay for it. [20100217172235] seems self evident. [20100217182654]	
A	The Mall is a complicated place serving many functions. The Mall is a place to contemplate and visit the monuments, memorials, and the two visible houses of government. Another is as an educational center (the museums). The Mall is a place of beauty, with both grand vistas and intimate gardens. And The Mall is a place for cultural gatherings and democratic assemblies. If more memorials are to be built, don't clutter the Mall with more; spread them out into East Potomac Park and make access easier between the Mall and East Potomac Park. [20100220062504]	A. As explained in the *Draft Environmental Impact Statement* (pp. 18–19) no new memorials may be placed on the National Mall. The *Memorials and Museums Master Plan* (NCPC 2001) identifies 100 locations for future memorials or museums around the District.
	It has nothing to do with limiting spending...it is all an unnecessary waste of our money. [20100223121907]	

Comment	Letter 41. Anonymous Comments Online — Question 6 (28 Individual Comments)	Response
	Comments pertaining to question 6: "Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?"	
	When working on a design always try and see how you can integrate the urban lansdcape into the Mall as much possible. This should be done in an organic, yet sustainable manner, which preserves and enhances the beauty of both the National Park and the City itself. [20100102145111]	
A	Increase in outdoor cafe type food venues and perhaps a signature mall restaurant (similar to Tavern on the Green in New York's Central Park). [20100103013352]	A. We have heard similar comments throughout the planning process. The National Gallery of Art Sculpture Garden facilities are also seen as a good model for facilities.
	Thank you for protecting this vital resource! [20100103095448]	
	Under any plan, there should be significant focus on public health (i.e. automated restrooms, vandal proof water fountains, handwashiing or hand-sanitation stations near food vending) and safety/security (PA system, signage, evacuation routes and designated shelter in place). [20100103171431]	
	I think the preferred alternative is the best option but I think making the capital reflection pool drainable instead of getting rid or making it smaller is a better idea. [20100103193723]	
B	I will keep my comments general but overall the plan presented seems like a good attempt to correct and revitalize the dimming facade and abuse of the National Mall areas. As a Washingtonian who lives three blocks from the Mall this plan is long overdue. The areas surrounding our national monuments and places of historic significance have become a barren wasteland that do not represent the grandeur and the intentions of the city's original planners. In addition, in the last 15 years the city and its neighborhoods have changed allowing for an influx of growth of residents in the downtown area--specifically between 14th and 3rd Streets, NW. With our urban spaces in these areas overrun with derelict individuals we have turned to the National Mall as our place of relaxation and recreation. Events: It makes most sense to focus on having demonstrations, entertainment, festival and event areas at the Union Square and West of 14 Street areas since these spaces flank office and government building's. This will allow the concentration of residents at the city center to enjoy a quieter urban space with recreational areas, playgrounds and designated areas for art and cultural experiences. This will also make it a more calming experience for city dwellers since they would not have to pass through throngs of protesters and visitors as they walk to the Mall to exercise, relax and enjoy our four-legged companions who too crave to have open spaces. Safety: There should be blue/red light safety phones/kiosks located throughout the National Mall areas. These are employed by many college campuses throughout the U.S.A. to provide emergency response and alert to authorities for those individuals who may not have a phone available or if their device is stolen/dropped during a physical assault. This would make countless visitors and residents feel much safer given the poor lightening and security measures on the Mall in recent years. [20100104143920]	B. Emergency call stations are included in the proposed plan, as described in the *Draft Environmental Impact Statement* on pages 87 and 184 (actions for row 8.2). Similarly, a mass notification system is proposed (pp. 87 and 184, actions for row 8.4).
	I have never been to Washington and don't know the specific needs. Generally, Union Square and the Mall are the venue where the people come at great trouble and expense to interact with our employees in government. These spaces must be designed to host and facilitate that interaction above all else. The Mall and memorials are not a museum; Washington has plenty of those. Recreational, decorative, and even ecological considerations, while desirable, must take a back seat to the park's use as "the people's front yard." The Union Square reflecting pool should be removed to make demonstrators comfortable in this space, as well as under the elms along the Mall, where their temporary facilities should be accommodated. The whole park must boast ample food vendors and restrooms and convenient transportation systems. [20100104183156]	
	When the comprimises are made, please make sure that you give and take on the basis of what is really attainable, not how you wish it would be. Deal in reality when negotiating changes to the plan, not in a pollyanna world. [20100110180153]	
	The National budget deficit. [20100128221310]	
	Thanks for your hard work! Our family absolutely loves The National Park Service !! When I retire from teaching I want to work for NPS.... [20100208182535]	
	Some great ideas there...go with it! [20100212113631]	

Comment	Letter 41. Anonymous Comments Online — Question 6 (28 Individual Comments)	Response
C	there is so much to read that i just wanted to say one idea. have you considered widening the pedestrian paths so there is less grass to mow. i think it might save money. thanks. [20100212142849]	C. Walks would be widened in several areas to accommodate use levels.
D	Suggestion: could you envisage using small paving blocks with space between them, and where grass can grow and reach some minimum height before it is trod upon? It looks really nice, provides drainage/watering, could replace the denuded lawn areas. [20100217141003]	D. We are continuing to explore appropriate materials. Based on experience at other sites, the level of use on the National Mall is too great for this type of material. Also, many turf areas are used for recreation and play, and the surfaces you describe would be too hard.
	The plans seem to meet the needs of what the Mall needs to look like and be for the many visitors. [20100217151329]	
E	Plase conside for the Mall project a very updated monorail to travel the entire distance of the "new" Mall. The mono rail could traverse from the entire Mall and back on the outter primeter to give visitors a recorded history of all the sites,have air condition and/warm confort, a easy visuals for all - old/young - and much time saving looks at the Mall. I feel this rail system would not detract from the cultural and natural look of the environment. Many "new" looks for mono-rail "trains" are in existance in the USA. A mono rail system around the National Mall would be the "ticket" Do it! [20100217153031]	E. The concept of a monorail is similar to a tram or streetcar system, which was discussed in the *Draft Environmental Impact Statement*. The document noted on page 131 that either system typically requires power to be run through overhead lines, which would intrude on views and vistas. The document also stated that desired transportation goals can be achieved with a bus system, as proposed in the NPS *Visitor Transportation Study* (NPS 2006a), without any adverse effects on the cultural landscape. Because this proposal would duplicate less expensive and less environmentally damaging means of transportation, and because it would fail to meet the plan objective to protect historic vistas, it was dismissed from further consideration. Language in the final document has been updated to include a monorail as having been considered but dismissed.
	Concrete. [20100217153815]	
	It must represent the state of our nation. Leave it in shambles. [20100217172235]	
F	I beleive the gress should be removed excepting the 4 outmost coners,to be regrassed.All of the remaining squares should dug up and Paved with any type sand,stone.concrete as decied by each of the 50 states.DC would get the center square The rest by federal design team. A square for example Vermont might pave there square with there state stone Granite,Navada red desert stones.One large one with Brass squares of the Presidents set in concrete. [20100217174426]	F. The idea is similar to L'Enfant's thinking that states could develop squares around Washington, D.C. We received similar suggestions that were considered but dismissed in the *Draft Environmental Impact Statement* on page 131 under "Adding New Features" because the integrity of the landscape would be changed and additions could be perceived as turning the National Mall into a theme park.
G	The use of artificial grass (turf) and/or a combination of artificial grass and old style hand made bricks. Do not use the type of artificial grass used on football fields; there is artifical grass that actually looks and feels like grass and only requires an occasional cleaning. [20100217180501]	G. See response 36K and the discussion of artificial turf in the "Summary of Comments and Responses" (page 21). Artificial turf does not meet criteria for durability, maintainability, and sustainability, and it is hotter than natural turf.
	please take into consideration the beauty and historicity of it. It not only is a symbol that binds americans to each other almost religiously, but persons from foreign countries see it as a symbol of the greatness of the one and only, United States of America. [20100217182654]	
H	I applaud the results of any well-researched and thought out plan. But before I can comment on any parts of this Plan, I have three questions: 1. What were the costs for all consultants used to create this plan? 2. What are proposed costs - or budgets - to execute even the most modest form of this plan? 3. Did I miss seeing the financials on the website? In business, such a plan would be accompanied by a budget, actually it would be required before being consideration by Executive Management. How can one decide the real value and appropriateness of a plan without knowing its financial impact by each part and the whole? Thousands of folks remain unemployed, US children are going hungry, homeless figures are the highest in decades, the foreclosure rate is rising, our critical infrastructures are in disrepair, just to name a few more pressing issues that I believe are more worthy causes than helping grass grow and further beautification efforts for DC...but that's just my opinion. [20100217183917]	H. The plan was prepared primarily by NPS staff, with some help by consultants. Conceptual costs are discussed in the *Draft Environmental Impact Statement* on pages 132–33; operating budgets are discussed on pages 348–49. Table 4 on page 133 illustrates the relative magnitude of costs for each alternative. These costs are only conceptual costs to show a relative difference between alternatives; actual costs when projects are ready to be started may be higher or lower.
I	Seriously, this all was way too confusing. You should have the plans laid out next to where you have respondents answer and comment. Make DC sustainable and beautiful. [20100219070722]	I. We regret that you were not able to easily review and comment on the plan. We tried to make the online review and comment process as user-friendly as possible and will seek to improve it in the future.
J	This is a park not a commercial business. I expect more flowers and better preventative maintenance to existing mall first and foremost. However, this does not mean making grant's statue shine like new. Let it look the way it looks now. Don't try to accomodate too many uses. This is a park. It does not need to be redesigned to accomodate alternate multiple uses. To do so would degrade all of the uses, including its intended use as a national park. [20100219075950]	J. Balancing use and preservation is challenging. NPS staff do undertake regular maintenance operations, including recurring, preventive, and corrective maintenance as needed (see DEIS, p. 349). The National Mall is an urban park in the capital city, and it would not be possible to preclude current uses; in addition, there are legal requirements to accommodate First Amendment uses.
K	I think the NPS should consider a number of possibilities for the plan: 1. Please consider the use of underground facilities such as restrooms, crosswalks, parking, and drop off areas. While these might increase some costs, they could positively impact traffic flow, availability, and overall convenience while maintaining current look. 2. Please consider a vast increase to technology	K. The goal of the proposed plan is to have facilities that are convenient, comfortable, safe, and easy to maintain. Underground restrooms are not feasible for the 12th Street area of the Mall, which is over a tunnel. The high water table throughout the National Mall makes underground facilities difficult to provide. Further, this suggestion may conflict with suggestions that the National Mall should be both a role model of best design in terms of urban public
L	considerations such as: - Providing wi-fi connectivity throughout the mall, free or otherwise. Make the entire Mall a "Hotspot". This would increase creativity for numerous uses well into the future. 3.	

Comment	Letter 41. Anonymous Comments Online — Question 6 (28 Individual Comments)	Response
M N O	Lighting: Please consider the use of LED type lighting for predominant features of the Mall. This would allow our Mall to have different color lighting themes that could be used for numerous purposes, festivals, seasons, holidays, etc. It could aslo be a showcase for artistically minded themes. 4. Allow for more food and beverage opportunities: vendors, stands, permanent structures, etc. Bottom line, there is never a food and beverage option very convenient around the mall, especially on the west end. 5. Overall, consider what can be done to increase cultural and LOCAL use of the Mall by making it a gathering spot year around for everyone. More concerts, more galleries, more life...day and night, year around!!! [20100219124735]	restrooms and universal accessibility because underground restrooms would require the use of elevators. There has also been an unwillingness of visitors to use NPS or concession facilities that have been provided underground on Pennsylvania Avenue (Pershing Park) and the Ellipse in President's Park. L. The proposed plan would accommodate wireless access. See the *Draft Environmental Impact Statement*, p. 192 (actions for row 9.8). This has been clarified in the final document for the preferred alternative under "Park Operations." M. LED lighting is being explored as the National Park Service seeks to reduce energy costs. N. The plan recommends more choice and variety in food service. O. Local users already may visit more than 20 times annually, often for recreation or permitted events.
	Time. If one of our greatest parks is falling into disrepair, lets find a way to move forward efficiently without letting too much time pass in the process. [20100222094915]	
P Q R S T U	Bicycle improvements need to be detailed in order to adequately review the preferred alternative. I am a daily bike commuter from Arlington, and the following are the priorites that need to be addressed. 1) The bicycle/pedestrian underpasses under Route 66 and the Memorial Bridge are incredibly unsafe - a separate bike lane, with a hard barrier between the cars and bike lanes, should be installed. 2) Separate bike lanes with hard barriers should be installed along Constitution Independance - the interaction of pedestrians in large groups and bicycles in areas such as the Washington Monument and Lincoln memorial are unsafe. 3) Create a way to get from the Mall to the bike/pedestrian crossing on the Teddy Roosevelt bridge - currently the only way to get to the bridge is from the Kennedy center. 4) Install bike lanes on all North-South cross streets. 5) Retain and increase private parking on Jefferson and Madison - it is nice to bring the family to the Mall on the weekend and not have to pay $8 to park in a lot. 6) Reduce tour bus parking areas on Madison and Jefferson - they are big, block the views, take up enormous space, and can easily discharge groups and depart the immediate mall area to park in a more remote location. [20100222111838]	P. This project is being undertaken as a result of the American Recovery and Reinvestment Act. Q. Barriers would be part of the proposed design for separate bike routes. R. The proposed plan would improve bicycle and pedestrian access to the Theodore Roosevelt Memorial Bridge, which is recommended by the *Monumental Core Framework Plan* (see DEIS, p. 44). S. North-south cross streets are under the jurisdiction of Washington, D.C. The National Park Service supports city bike plans. T. In the short-term parking would remain on Madison and Jefferson drives, and as recommended by the *Visitor Transportation Study*, it would be metered. The long-term goal is to remove parking (see DEIS, p. 90). U. Under the proposed plan existing tour bus drop-off and pickup locations would remain, and the National Park Service would continue to work with the D.C. Department of Transportation and other city agencies to address tour bus parking (see DEIS, p. 90).
V	availability to get cash within a reasonable distance, and during Cherry Blossom Festival.... we want the availability to use our charge cards.... I couldn't last year and my little boy and I wanted food and T shirts... we were told it was the Park Services Issue that they couldn't accept charge cards. I as a single woman and mother do not carry cash on me. [20100304171037]	V. This is a service that could be examined during feasibility and programming studies for bookstores, food service, or multipurpose facilities.
W	NPS should apply the Sustainable Sites Initiative's guidelines while restoring the soils and turfs. NPS should provide WI-FI infrastructure throughout the National Mall, which will help draw people, who can then sit and use their laptops. Service could be provided for a small fee, helping to raise revenue for the restoration. A number of cities, including San Francisco and Philadelphia, which are both aiming for city-wide WI-FI coverage, have also explored free WI-FI areas. [20100310173036]	W. The proposed plan supports the goals of the Sustainable Sites Initiative™ and would accommodate WI-FI service (see DEIS, pp. 53 and 192).

Comment	Letter 42. Kathryn Anthony	Response
	Kathryn Anthony (kanthony@illinois.edu) 03/10/2010	[EDITOR'S NOTE: Comments submitted online.]
	[Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")]	
A	Attractive public restrooms in key locations throughout the National Mall are needed to ensure a family-friendly environment for visitors around the world. Right now they are *inadequate* and highly problematic, especially for families with children and older people. We need state-of-the-art, beautifully designed, well-maintained, safe and clean public restrooms monitored by attendants. See the Kellogg Park public restrooms in La Jolla, CA (City of San Diego) - highly successful award-wining unisex restrooms that receive 2-3 million visitors per year. Also look to Japan as an example - the most progressive country in the world re: public restrooms, a vast improvement over the USA. Let's make the National Mall Public Restrooms an international model for others to emulate! - Kathryn H. Anthony, Ph.D., member, Board of Directors, American Restroom Association; ACSA Distinguished Professor, School of Architecture, University of Illinois at Urbana-Champaign	A. We agree that the National Mall could be a role model for urban public restrooms. The plan proposes that restrooms be integrated with other facilities, well dispersed, conveniently located, and sized for levels of use. The option of self-cleaning restrooms is also included. Given the high levels of present and projected use, permanent restrooms are proposed in areas where many permitted events are scheduled in order to reduce the reliance on portable toilets. All proposed facilities must meet very high standards for sustainability, and stewardship or educational messages would be included in the facilities.

Comment	Letter 43. Adam Bliss	Response
	Bliss, Adam [USA] <bliss_adam@bah.com> 02/23/2010	[EDITOR'S NOTE: Comments submitted by e-mail.]
A	I was wondering if you will post the comments made during the 18 February 2010 Public meeting on your website? I was unable to attend but I am extremely interested in the project.	A. The February 18, 2010, public meeting was to answer questions. All attendees were directed to the comment website.
B	I also want to say that I think using the engineered soils is a great idea. The large brown spots on the lawn are such a tragedy. It really makes me ashamed to know that foreign visitors see the mall in that condition. I also think that the reflecting pool between the Lincoln and Washington monuments needs to be re-thought. I would think there is a better way to keep the water looking somewhat clean. Lastly, I think having organized sports played on the lawn should be reconsidered. The mall, though a public place, is not, in my opinion a ball field. Besides playing softball with all the pedestrians nearby is not safe, and keeps others from enjoying the whole of the mall.	B. The rehabilitation of the reflecting pool, which is being funded separately by the American Recovery and Reinvestment Act, should improve water quality.
C		C. Recreational public use of turf areas is a long tradition. Many find playing within the shadow of great symbols of our nation to be a wonderful democratic experience.
	Adam Bliss Booz Allen Hamilton AFCEE/EXN 1602 California Ave #239 Andrews AFB, MD 20762 Office: 301.981.0288 Cell: 571.269.5823	

Comment	Letter 44. Maurice Brown	Response
	maurice brown (maurybrandy4@aol.com) 02/17/2010	[EDITOR'S NOTE: Comments submitted online.]
	[Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	
A	Having visited 3 years ago we found the mall to be used for a wide variety of things. First its a destination for visitors like we were. Second its a venue for the public to gather and express opinions. Third its used a a city park for residents. The shear number of people using the mall make it a real problem to keep grass growing and healthy so my opinion is you do the best you can realizing that perfection is never going to happen. I would suggest that events which require tents and alike be curtailed or sited in other areas whenever possible. People don't travel thousands of miles to see their views obstucted by a series of tents that diminish their experiance and frankly look like a small county fair. Because of the defered backlog of items that all need attention I would hope that public use be a priority and the items that go with it. More public restrooms would top my list. Get all the money you can from congress, god knows they waste alot. In closing I would say we saw some bare spots, a little mud, and visiting Washington was still the most outstanding experiance we have ever had. Good Luck.	A. The National Mall has a civic purpose that is not present to the same degree at any other area of the national park system. As stated in the *Draft Environmental Impact Statement* on pages viii and 83, the preferred alternative proposes a balanced approach that includes respectful rehabilitation so that very high levels of use can be perpetuated and the National Mall can successfully and sustainably function as our nation's premier civic space for today's and tomorrow's visitors.
	[Comment pertaining to question 3 ("Indicate the extent to which you agree with the description of how the Preferred Alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals.")]	
B	Any step taken to improve the environmental aspects of the mall may offer a vision that can be taken to other parts of the country.	B. We have repeatedly heard about the importance of the National Mall being a role model for the nation.

Comment	Letter 45. Eleanor Budic	Response
	Eleanor Budic (ellie.budic@verizon.net) 02/16/2010 [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")] There is a critical need to restore and preserve the National Mall and Monuments. [Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")] Thank you for citizen engagement in the planning process.	[Editor's Note: Comments submitted online.]

Comment	Letter 46. Jon Bussard	Response
	Jon Bussard March 18, 2010 5:28 p.m. Comments: I am very happy to comment on the national Mall plan and would like to say that I wish that some of the recommendations and designs of the Skidmore Owens plan of the mid 1960's would be reinstated.	[Editor's Note: Comment submitted by e-mail.]
A	The main one I would like to see implemented is the plan to completely remove vehicle traffic on all north to south running streets thru a series of tunnels underneath the mall. Some of these have been done, but not all and I think that it would not only be aesthetically pleasing to the viewer with a grandiose effect, but would also improve the pedestrian experience, ease traffic, and help security concerns. With this done from the World War II Monument to the reflecting pool in front of the Capitol would truly enhance the feeling of being somewhere "Monumental" and unmatched anywhere in the world. Also with the current discussion of changing Union Square to an area for public demonstrations and possibly removing the reflecting pool or converting it to a transitional drain and fill facility, let me suggest a better plan.	A. All current D.C. vision plans desire to improve connections to the National Mall in a manner that celebrates its key central location in the city. Tunnels, however, increase separation because they make sightseeing impossible, which is an important visual connection to the symbols on the National Mall. Several tunnels were proposed for streets under the National Mall in the 1970s, including 4th, 7th, 14th, 15th, and 17th streets. However, after the construction of three tunnels (2nd, 9th, and 12th streets), it was determined that the visual impacts of tunnel portals, especially those adjacent to the National Mall, were too great. Moreover, the McMillan plan showed these streets crossing the Mall at grade, giving "needed life to the Mall" (U.S. Congress 1902, p. 45). Various alternatives considered in the *Draft Environmental Impact Statement* propose pedestrian and vehicular tunnels, including a vehicular tunnel for 14th Street (alternative C). Tunnel construction has been dismissed because of the high cost, duplication with other less costly alternatives to improve the pedestrian environment, and conflicts with current plans.
B	With the removal of the street in front of the reflecting pool this could add more space to expand Union Square and add more public space to install seating areas and demonstration areas, or plaza etc.	B. The I-395 tunnel replaced the ceremonial boulevard which would have resulted from closing 3rd Street and would have accomplished your goals.
C	All of the previous plans from L'Enfant to McMillan to the Skidmore Owens plan always had this area designated in some capacity as a reflecting pool or water area, why consider altering a proven great idea?	C. The proposed plan would retain water at Union Square. The final design for Union Square, which would occur after a final plan has been approved, could address many of your concerns.
D	It would also be a tragedy to remove the current cement pool enclosure that already is refreshing to sit on and relax with an unmatched view of the Capitol or the Mall. A better idea would be to simply improve on what is already existing, fix the draining problem remove the street, and add a plaza, problem solved. With the removal of the street in front of the relecting pool this could add more space to expand Union Square and add more public space to install seating areas and demonstration areas, or plazaetc. All of the previous plans from L'Enfant to McMillan to the Skidmore Owens plan always had this area designated in some capacity as a reflecting pool or water area, why consider altering a proven great idea? It would also be a tragedy to remove the current cement pool enclosure that already is refreshing to sit on and relax with an unmatched view of the Capitol or the Mall. A better idea would be to simply improve on what is already existing, fix the drining problem, remove the street, and add a plaza, problem solved.	D. The current pool coping is limestone, and there may be ways to reuse it.

Comment	Letter 47. Susan Campbell	Response
	S Campbell <swcamp@aol.com> 02/19/2010 Unfortunately I moved out of DC a few weeks ago, but as a long time resident I frequented the Mall - at a minimum - 4 to 6 times a week. As a runner and walker, there was no better place to go after work and on weekends. Running/walking past the history and always feeling secure, made the Mall one of the greatest places on earth. Showing the Mall to frequent visitors - from a local's perspective - was a thrill. Even the smell of the 'geese' was special, but could definitely be toned down a bit.	[EDITOR'S NOTE: Comments submitted by e-mail.]
A	Restrooms similar to those at the Arlington Cemetery would be great. But, in my opinion, DO NOT turn the Mall into a food court and/or entertainment center - there are plenty of museums and restaurants throughout the neighborhood. Concerts and special events are spectacular on the Mall, but daily entertainment and food centers would take away from the appeal. It's "a national park" that should be protected just like our other great national parks - Yellowstone, Yosemite, the Grand Canyon, etc. - natural, historic, and open. I agree, restrooms, little kiosks, fresh soil and grass, paved paths, and better filtration in the reflecting pool and tidal basin would be huge improvements. I hear kids and families comment on the monuments and Mall all the time - what I hear(d) most ... 'it's just like looks in our school books.' That historic familiarity is what the Mall is all about ... even the Merry-go-Round! SUSAN CAMPBELL	A. The plan proposes public visitor facilities that would be well dispersed and convenient.

Comment	Letter 48. Regina Carelli	Response
	Carelli <carelli@erols.com> 02/19/2010	[EDITOR'S NOTE: Comments submitted by e-mail.]
A	Please PAVE the gravel walk ways. I have had the experience of pushing my mother in a wheel chair, my twins in a double stroller and now trying to walk with bad knees and a cane. The gravel is difficult for all of these tasks. Making it deeper as suggested by Mr Powell would just exacerbate these problems. I should think it would be uncomfortable to feet in sandals and flip-flops. Regina Carelli 1423 Woodman Ave Silver Spring. MD	A. Given its civic and symbolic importance, we agree that the National Mall should be one of the most inclusive and accessible locations in our nation.

Comment	Letter 49. Mary Champion	Response
	Mary Champion championart@aol.com 01/30/2010 [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")] It appears to encompass the best of all other alternatives without undue focus on issues that I do not feel need addressing, such as demonstrators and global issue forums. [Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")]	[EDITOR'S NOTE: Comments submitted online.]
A B C	consider a Global Village type area off the beaten path for large gatherings of folks with global issues - leave the Mall proper to be the US National front yard. I am certain that all repairs and changes to tidal basin will include extraordinary measures to protect the cherry trees; even a few passes over the roots with heavy equipment could hurt them. PLEASE DO NOT PAVE THE GRAVEL PATHS. curb them to contain gravel if you must, but strollers will just have to muddle over them. please.	A. Your suggestion to have a global village area is interesting. Many activities and events may have a cultural component. However free speech about global issues remains protected by the First Amendment. B. The cherry trees would be protected under all alternatives. C. Regarding gravel paths, please see response 8D, as well as the discussion of gravel walkways under "Summary of Comments and Responses," beginning on page 12.

Comment	Letter 50. John Cloud	Response
	John Cloud (John.Cloud@noaa.gov) 02/19/2010 [Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")]	[Editor's Note: Comments submitted online.]
A	I find your DEIS document hard to use. I wanted to see, in the preferred or other alternatives, how NPS proposed to deal with a specific issue that is notable to me. Under present conditions, there is virtually no accessible electric power available to temporary events or public demonstrations on the Mall. Every summer, for example, at the Smithsonian folk life festival, the different activities compete in a soundscape of diesel powered generators, with a haze, at the least, of exhaust coming from generators located right in the middle of the Mall. This is unacceptable. In any civilized place, as in Europe or eastern Asia, it would be unthinkable to have diesel generators on their equivalents of the National Mall. So I looked at your pdf. but was unable to find anywhere in ANY of the alternatives where the issue of electirc power for temporary events was mentioned. Even in the Appendices, which do not list an Index, there is an Index, but "Utilities" although mentioned throughout the report, is not listed. I project from this that others may find similar difficulties in determining specific proposals for specific issues in the report. Very very poor organization on the part of NPS!	A. We agree about the impacts of the lack of power for temporary events, and that is one of the reasons for proposing utility infrastructure connections. See the *Draft Environmental Impact Statement*, pages 7, 84, 160 (actions for row 4.1), and 162 (actions for row 4.3). Electric power is discussed as part of infrastructure in the *Draft Environmental Impact Statement*.
B		B. Entries for 'utilities' and 'utility infrastructure' have been added to the index.

Comment	Letter 51. Ann Coffey	Response
	Ann Coffey <ann.coffey@rogers.com> 12/17/2009 What a total waste of money! It would be much better spent to actions to reduce greenhouse gas emissions because we're well on our way to destroying our life support system. The mall will look pretty funny then, eh?	[Editor's Note: Comment submitted by e-mail.]

Comment	Letter 52. John Coghlan	Response
	John Coghlan (johncoghlan2000@ yahoo.com) 01/01/2010 [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	[Editor's Note: Comments submitted online.]
A	At this point I am apposed to any changes to out National Mall. I am sure that their are many dedicated people at The National Parks Service who only have the best intentions in making improvements to the National Mall. I am also well aware of the political manipulations that are underway to use any National Mall improvements project to inhibit ower freedom of speech, and freedom of assembly. The American Peoples freedom of assembly means that we have the right to peaceable assembly in any public space. We will not be moved to an out of the way place where our voices will not be heard. In the peace movement these fenced off designated areas have become known a as Free Speech Cages. We will have no Free Speech Cages erected on the out side our National Mall. All parts of the National Mall have been the traditional place for citizens to express their grievances with their government and it will continue to be so. Constitutionally guaranteed public assembly is going to take place weather the National Parks Service likes it or not. A lot of the photographs on the CD made by the National Mall Improvements Project were pictures of trash that was left after large Political Demonstrations. I suggest that the Parks Department do as they have always done in the past about trash on the National Mall. Pick it up. Our rights as a free people are much more important then greener grass, or a prettier parks. [Editor's Note: Similar response to question 2.]	A. The National Mall is an important venue for political speech, and demonstrations will not be restricted into any one area. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."
	[Comment pertaining to question 3 ("Indicate the extent to which you agree with the description of how the Preferred Alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals.")]	
B	Comparing the a small Mall in Washington with National Environmental Policy, or World Ecology is a stupid way for you spin your proposal	B. The National Environmental Policy Act requires that alternatives be compared as to how well the goals of the act are met.
	[Comment pertaining to question 4 ("Indicate the extent to which you agree with the comparison of how the alternatives meet the plan objectives laid out in Table 6.")]	
	The best alternative is to leave our National Mall alone.	

Comment	Letter 53. Brian Daniel	Response
A

Comment	Letter 55. Sherrill Futrell	Response
	Sherrill Futrell <safutrell@ucdavis.edu> 12/19/2009 I don't care what you do to the Mall. Just stop arresting us every time we peacefully protest.	[Editor's Note: Comment submitted by e-mail.]

Comment	Letter 56. Dan Gamber	Response
	Dan Gamber 02/19/2010	[Editor's Note: Comments submitted by e-mail.]
A	We have friends and relatives with mobility problems. One has had MS for years. Most can move with walkers, but not far or fast. Once upon a time, when they came to visit DC these friends and relatives had reasonable access to the big monuments. We could park by the Jefferson, there was a lot fairly close to the Washington, and you could actually drive by the front of the Lincoln. You could drive alone Pennsylvania Ave by the front of the White House, and along E St to see the back of the White House. No longer for any of those. Now for the Lincoln and Washington you either have to travel on foot for blocks - if you can find street parking on Constitution. The Jefferson is even more difficult, with the only parking under the 14th St Bridge. For the south side of the White House, the best you can hope for is street parking on 17th. In all cases, without a motorized scooter or wheelchair, our friends and relatives are denied access to or in many cases even a decent view of, the monuments. The new NPS mall plan does not even consider the handicapped. The alternatives section seems to use the term "best practices" as the means of defining the objectives. Pages 54 - 55 on public access make no mention of the handicapped. It is sad, and unnecessary, that our current phobia with "terrorism" has denied access to our most vulnerable - including those who are impaired because of their service in war.	A. The *Draft Environmental Impact Statement* includes multiple references to accessibility, along with facilities and programs for visitors with disabilities, as indicated by entries in the index. Also see pages 85, 86, 178 (actions for row 7.4), and 184 (row 8.3). The proposed plan covers universal accessibility to places, programs, parking, wheelchair rentals, and supplementary transportation. Because of the symbolic and civic importance of the National Mall to all citizens, and its generally flat terrain, we agree that it should be our country's preeminent example for inclusiveness and universal design. The planning objectives on page 7 have been strengthened to address this concern.
	Dan Gamber 1502 Caroline St NW Washington, DC 20009 202 251-7425 daniel@gamber.net	

Comment	Letter 57. Frederick Graefe	Response
	Frederick Graefe <FGraefe@graefelaw.com> 02/19/2010	[Editor's Note: Comments submitted by e-mail.]
A	Pls include in your national mall plan the commitment to replace streetlights when there are outages, and to install new lighting for safety and security reason; e.g., there are many lights along Old Ohio Drive which remain out; also, the streetlights under the TR Bridge along the Rock Creek Parkway, near the Kennedy Center and behind the Lincoln Memorial, have been out for several months; this is unacceptable; I hope u tell DDOT and Pepco to install a new meter so that these lights can be restored; thank you.	A. Please see the *Draft Environmental Impact Statement,* pages 87 and 184 (actions for row 8.2), which propose improved lighting.
	Frederick H. Graefe, Esq. Law Offices of Frederick H. Graefe PLLC 319 Constitution Avenue, NE Washington, D.C. 20002 202.548.0220 (voice) 202.548.0355 (fax) 202.494.6799 (mobile) www.graefelaw.com	

Comment	Letter 58. Carl Hames	Response
A	Dec 29, 2009 National Mall Plan To Mall Plan, I am writing to you to express my opposition to any proposals to restrict the use of the National Mall for demonstrations. The Mall is vitally important for expressions of political protest in this country, and I demand that its use remain unrestricted for such purposes. Sincerely, Mr. Carl Hames 2749 Sunlight Dr Little Elm, TX 75068-7615 (469) 734-0647	[EDITOR'S NOTE: Comment submitted by fax.] A. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."
Comment	Letter 59. John Hance	Response
A	John Hance (jdhinatl@ aol.com) [Comment pertaining to questions 1, 2, and 6.] The mall should be green grass. The geese at least most of them need to go. The mess the geese make is disgusting.	[EDITOR'S NOTE: Comments submitted online.] A. All of the alternatives considered in the *Draft Environmental Impact Statement* include a proposal to address urban wildlife issues and nuisance species, including Canada geese (see pp. 156, actions for row 3.5, and 409).
Comment	Letter 60. William Haskett	Response
A	William Haskett (williamhaskett@hotmail.com) 12/24/2009 The nationalmall is not a product of anyone but the accidental coincidence of what was left over from the incomplete Washington Monument, the inadvertent removal of the railway station that stood on it until late in the 19th.C. and the monumental linearity of the so-called MacMillan Plan and its distortions of public purpose in the area. I much prefer Downing's arborial andcurvilinear version of the mid-19th.C. So long as we cannot make DO NOT WALK ON THE GRASS an official doctrine, the nps is barking up the non-existent tree.	[EDITOR'S NOTE: Comments submitted by e-mail.] A. The McMillan plan vision for the National Mall was carefully thought out; however, it did not foresee the level and types of uses that the National Mall would see by the 21st century. Congress directed the National Park Service to preserve the character of the National Mall, resulting in the present planning effort.
Comment	Letter 61. Chuck Hookstra	Response
	Chuck Hookstra (kentuckyrb l@aol.com) 02/23/2010 [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")] Why don't you government morons leave well enough alone? Spend our money where it will do the most good, like creating jobs. [Comment pertaining 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?")] I would, but I don't want to get jailed by Osama bin Obama's Islamic/Fascist Governmental thugs. /S/Chuck Hookstra, 29 year military vet, unemployed History/Civics teacher.	[EDITOR'S NOTE: Comments submitted online.]

Comment	Letter 62. Michele Hopkins	Response
	Michele Hopkins (Michele@SplendidPortraits.com) 02/21/2010	[EDITOR'S NOTE: Comments submitted online.]
	[Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	
	Agree that restoring green spaces and water areas is a top priority. Also am pleased with the increases in restrooms, retail/food establishments. Really liked the rental transportation in plan A. Shrinking the Union Station pool is an excellent idea as well.	
	[Comment pertaining 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?")]	
A	I do agree you must eliminate the gravel but please do not pave the walkways - that looks so common. Consider using brick or pavers instead.	A. The plan proposes developing a palette of paving materials appropriate to the character of the National Mall.
B	[Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")]	B. As stated on page 176 of the *Draft Environmental Impact Statement*, all new visitor service facilities would be designed to be compatible with the character of the National Mall, making them easily identifiable for visitors, strengthening the NPS identity, and denoting that they are secondary to national memorials. Facilities would also be sustainable.
C	Please make sure to maintain the integrity of the food, restroom and retail establishments you will add. Make sure they fit architecturally with the integrity of the overall aesthetic. I am also concerned that replacing landscaping/grass is a short term solution due to the usuage of the mall. How will we improve the look of the Mall while the in the short term while improving the long term maintance so that the money spent lasts?	C. Ensuring that improvements would be sustainable is a critical concern and important for reducing future corrective and preventive maintenance.

Comment	Letter 63. Tom Howlett	Response
	Tom Holwett 02/19/2010	[EDITOR'S NOTE: Comments submitted by e-mail.]
A	Why care about an area that will be flooded in a less than a hundred years. Would it not be better to use the funds in planning a new mall for a new National Capitol that will have to be built as sea level raises.	A. The impacts of global warming are addressed in the *Draft Environmental Impact Statement* on pages 39–40. Please also see the discussion of climate change under "Summary of Comments and Responses" (page 16).
B	The budget will be tighter and tighter due to the national debt and funds NPS gets need to be spent on projects that will be as the service guide states 'for futuer generations". If you spend it now it want be available then when it is needed. And the current mall is a disgrace, no place to eat, drink or go to the bathroom after hours. The mall becomes a empty place not a lively place. Please stop building in DC and only use funds limited to allow current places under your care to exist until they are relocated or flooded. Let us see the NPS budget for the next 100 - 200 years. This applies to all areas that will be flooded, and replacements for them. Is there a plan to obtain new lands as nature redesigns the landscape submerging old and creating new shore lines?	B. Better meeting visitor needs is one of the reasons for the proposed plan.
	Tom Howlett 3625 Elm Farm Road Lot 125 Woodbridge, VA 22192 Home/Cell: 571-264-9503 Alternate: 571-330-5959 Email: vadogpound@yahoo.com	

Comment	Letter 64. Sydney Jacobs	Response
	Sydney Jacobs (sydney.jacobs@verizon.net) 03/14/2010 [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	[EDITOR'S NOTE: Comments submitted online.]
A	Many years ago, I filed a complaint about the inaccessibility of the Mall gravel paths for wheelchair users and others who find the gravel pathways difficult, or impossible to navigate. Despite the opposition of members of the Planning and Fine Arts Commissions, the Park Service did make some improvements: Two north/south pathways were paved with a conglomerate-concrete surface at 9th and 12th sts, in the mid 1990s, and hardened pathways were constructed along Madison and Jefferson Streets as part of street improvements already scheduled along the Mall. I was told that it would probably be years before any meaningful accessibility improvements would be made to the entire site, and that some day, accessibility would be part of a comprehensive renewal for the entire site. So now, more than 15 years later, I am pleased that a 21st century visionary plan for the National Mall is underway. Overall, I am excited at the comprehensive nature of the draft plan, and wholeheartedly endorse the Preferred Alternative Vision. The opening statement of the Preferred plan is an inspiring vision for the site. I am particularly excited that the Park Service recognizes the National Mall NOT just as place of enduring monuments to our past, but as a place of evolving historic importance, where contemporary events continuously unfold to become part of our National Story. For too long, a "sacred" preservation of the built environment has been the excuse for failing to make structures of all kinds accessible to ALL people. By finally recognizing the National Mall as the American "front lawn" and site of current events, that excuse is no longer valid. While the overall plan mentions universal access as part of the Mall renovation, I know through experience as a former NPS employee, and as a user of National Parks, that one can't assume universal access will be a reality with this agency. It is CRITICALLY important that universal accessibility be fully integrated into EVERY aspect and detail as the renovation unfolds. To ensure this happens I hope that persons with expertise in accessibility are part of the planning team with an equal voice to those concerned with both historic and natural preservation. I look forward to the day when the National Mall renovation is complete: not only as a showcase to the world of 21st century sustainable design, enduring history of democracy and natural beauty, but as a premier example of universal design.	A. The preferred alternative covers universal accessibility to places and programs, additional parking for people with disabilities, wheelchair rentals, and supplementary transportation.
B	[Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")] While I looked over the entire draft plan, my main concerns are with accessibility for people with mobility impairments. My comments in this area are all in one statement at the beginning of this document. Generally, I find the Plan to be extremely well done, encompassing a well-thought out plan for the Mall that I hope will become reality in my lifetime.	B. Because of the symbolic and civic importance of the National Mall to all citizens, and its generally flat terrain, we agree that it should be our country's preeminent example for inclusiveness and universal design. The planning objectives on page 7 have been strengthened to address this concern.

Comment	Letter 65. Lynn Jone	Response
	Lynn Jone 2/11/2010	[EDITOR'S NOTE: Comment submitted by e-mail.]
A	Dear Sir/Ma'am, It was a hard fought battle for civil rights for African-Americans in the United States of America--by Americans--and for the most part, much of the movement's success (although there is still much work to do) can be attributed to the Reverend Doctor Martin Luther King, Jr. And now, a monument is being built to honor this great American Icon. Is the granite for such a monument really coming from China? From China? I must write this! Do we not have granite in the United States of America? Do we not have sculptors in the United States of America ? Are there not agencies in the United States who can help the Alpha Phi Alpha Fraternity come up with the necessary funds to commission a sculptor and sculpture right here in the United States?Americans are finally on the precipice of making our way through the morass of a convoluted racial history, so we cannot possibly allow the repressive Chinese government, which has so little regard for human rights to provide us with the granite for such an important monument--nay, for such an important moment in our history. Thank you for your time, and I look forward to a response. Sincerely, Lynne Jone	A. The Martin Luther King, Jr. Memorial was not included in this planning effort since it had been previously approved and is currently under construction. The comment was responded to separately.

Comment	Letter 66. Andrew Kalukin	Response
A	01/30/2010 Dear Ms. Spain, I would like to make a few comments on the National Mall Plan Draft Environmental Impact Statement. The materials sent by the Department of the Interior and the web page of NPS have a lot of details, which I think are helpful. Of the several competing goals under consideration -- historical information, increased public space, and ecological considerations -- my greatest priority is increasing the public space. The most important feature of the National Mall is not the monuments or architecture, but the space it provides for the groups of concerned citizens to make their voices heard regarding issues of national importance. I think it is crucial to the Mall's role in our democracy that access to it, and the ability to carry out orderly assembly, should not be impeded by excessive structures. As long as ecological maintenance and historical improvements are made with this in mind, I think it may be possible to accommodate all of these desirable ends. Thank you for considering my comments, and please correct me if I should email another point of contact instead. Best regards, Andrew Kalukin Arlington, VA kalukin_99@yahoo.com	[EDITOR'S NOTE: Comment submitted by e-mail.] A. Under the preferred alternative, as described on p. viii and throughout the *Draft Environmental Impact Statement,* the National Mall would be refurbished as our nation's primary civic space so that very high levels of use could be sustained.

Comment	Letter 67. Lisa Landis	Response
A	Jan 5, 2010 National Parks Service / National Mall Plan Dear National Mall Plan, I am writing to comment on the NPS "Preliminary Preferred Alternative" plan for the reorganization of the National Mall. I ask that the National Park Service guarantee that there will be no new restrictions on the time, place or manner of use of the National Mall for free speech activities. The Mall is an historically important location for free speech in the Nation's Capital. I support the Partnership for Civil Justice Fund's 8 Point Plan to Protect Free Speech and Dissent on the National Mall and request that the NPS affirmatively agree to these points in any final plan. Sincerely, Ms. Lisa Landis PO Box 1164 Brevard, NC 28712-1164	[EDITOR'S NOTE: Comments submitted by fax.] A. We agree on the importance of the National Mall as a venue for political speech. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."

Comment	Letter 68. Randy Leader	Response
	Randy Leader (randydl@precicom.net) [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	[EDITOR'S NOTE: Comments submitted online.]
A	I visited the mall on The 4th in 2008. I was appalled at it's condition. It did not seem to me that it needed a rebuild as much as it just needed to be taken better care of. I don't see why you can't even clean the scum out of the little pools at the nations capital. I think the condition of the mall is YOUR FAULT!!! Now you say you want to make it better. I have not forgiven you for what you did to MT Rushmore when you "Made it better". It is an open and free place right now. Every time I read	A. High use levels are a challenge. The scum you refer to is the result of pools designed without filtration systems or recirculation. Staffing for the park is at a near low point, and deferred maintenance (unfunded repairs) was estimated at $450 million as planning began.
B	"Security perimeter" or "Impact on Demonstrations and the first Amendment" I get a real uneasy feeling. I can't help but wonder if we would just be better of if we did nothing and just hired a contractor to take care of the mall and sent the USPS home!!!!	B. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."
	[Comment pertaining 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?")]	
C	More restrooms would be nice. Paving the gravel walkways and repair the existing infustructure should have been done a long time ago!!!	C. The items you identified are important are included in the proposed plan.

Comment	Letter 69. Iain Lowrie	Response
	iain Lowrie (sbdezine@hotmail.com) [Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")]	[EDITOR'S NOTE: Comments submitted online.]
A	with reference to improvement to the facilities for the playing of SAND VOLLEYBALL at far north end of mall, colloquially referred to as "The Lincoln Mall Courts" near the Kennedy Center: specifically the improvement of drainage; installation of a system to keep the playing field level with sand, specifically, the inclusion of permanent wood perimeter barriers level to the ground surface 2 1/2 feet from the actual court line markings, which would aid in the reduction of erosion; improvement of the nets and poles; a potable drinking water source (there have been several dehydration incidents there during summer months) and perhaps either a foot or full body shower off spot, and most importantly, the installation of lighting that would enable play to continue after dusk. These lights could be installed along the walkway of the street parallel to the Potomac River, which is used as an entrance way to the Memorial Bridge from Rock Creek Parkway. Here they would not be an intrusion on specific park land. Placed elsewhere in the area, they would light several more courts, as well as being a safety factor for cyclist and pedestrians who use the pathway that runs through the aforementioned field of courts. There are many others who support these improvements. I have had the great satisfaction of enjoying the VB courts for more than 20 years. Thank you for your time.	A. A small restroom facility with drinking fountains has been added to the preferred alternative for this area. Because of its location, a self-cleaning restroom might be considered.

Comment	Letter 70. John Mariani	Response
	<john@jma2.com> 02/19/2010	[EDITOR'S NOTE: Comments submitted by e-mail.]
A	please please do not pave over the gravel areas of the mall, as proposed. the gravel is a wonderful texture, aesthetically pleasing, and works well with the grassy areas. we are going to great efforts around the country these days to encourage removal of paving, a small but important idea of sustainable sites (LEED). paving over the miles of gravel would send exactly the wrong message and probably create headaches with ponding and runoff after rain storms. if i am not mistaken, the mall was essentially a swamp in its original natural state; gravel may have been chosen back then for absorption purposes. i think they knew what they were doing. thanks, john mariani	A. A gravel surface is not necessarily porous. It is difficult to maintain since it migrates into turf and onto walks. It is inaccessible to many, especially visitors in wheelchairs and those pushing strollers, and it generates a great deal of dust that causes complaints about breathing and dust in eyes. Aesthetically pleasing characteristics and texture can be criteria for paving. Also see response 8D and the discussion of gravel walkways under "Summary of Comments and Responses," beginning on page 12.

Comment	Letter 71. Peter McCann	Response
	Peter McCann (rawlysbu@aol.com) 02/22/2010 [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")]	[EDITOR'S NOTE: Comments submitted online.]
A	Probably need to put sprinkler systems throughout the grounds. Need better soil. Also should probably rotate areas where pedestrians can not walk so as to allow grass to recover. The mall area should look like a botanical garden....	A. We agree that irrigation and better soils are needed.
	[Comment pertaining 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?")]	
B	A few suggestions: Many more cameras covering the mall area and monuments ... including night vision capability. Need to probably triple the number of park guards. One park guard should always be giving a presentation at the key memorials and one should always be nearby for questions. Attractive plaques should be placed at key points that provide history and key stats about the monuments -- and the Presidents or wars they are commemorating.	B. Park rangers and United States Park Police are involved with protecting memorials and answering visitors' questions. Rangers also provide programs and orientation. In addition to programs, brochures, and cell phone tours, wayside exhibits are educational panels that provide information about specific memorials and topics.
	[Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")]	
	I have long said that the Mall area was a national disgrace. I hope they invest the money, time and resources to do it right. Millions of people from around the world come to Washington DC every year and almost all of them visit the mall grounds. The mall area should be beautiful, well manicured lawns, beautiful flowers every where — regardless of season — and multiple park guards should be giving presentations 12 hours a day. They also need guards at the major monuments 24 hours a day. Do you know there are no guards at the monuments at night? Someone could plant a bomb at night and blow the Lincoln Memorial to pieces. they need guards.	

Comment	Letter 72. Jo Mozingo	Response
	JO MOZINGO (jomozingo@gmail.com) [Comment pertaining 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?")] This plan is the only one that keeps the historical sense of our Mall while allowing it to truly be a space of our people. It lays out the necessary steps to enhance all uses as well as protect and invigorate and maintain the natural spaces for our grandchildren. It also recognises the tremendous importance of the Park Rangers and hopefully may allow them time to be interpreters rather than enforcers. [Comment pertaining to question 3 ("Indicate the extent to which you agree with the description of how the Preferred Alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals.")] The Preferred Alternative balances high numbers occasional use and daily recreational use while maintaining the integrity of the spaces and maintenance of landscape. [Comment pertaining to question 4 ("Indicate the extent to which you agree with the comparison of how the alternatives meet the plan objectives laid out in Table 6.")] Again, the Prefered Alternative enhances the experiences of a broad range of visitors and users while respecting the cultural, historical and physical health of The Mall. I especially want to preserve the N/S E/W axis.	[EDITOR'S NOTE: Comments submitted online.]
A	[Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")] NO PARKING LOTS!!!!!!!!!!!! UNDERGROUND OR ABOVE GROUND! Parking lots are legal graffiti: once they appear the perimeters always gradually increase. The Mall is not the place to "pave paradise and put up a parking lot".	A. The plan proposes converting a staff parking lot to additional parking for visitors with disabilities (see DEIS, pp. 91 and 212, actions for row 13.4).

Comment	Letter 73. Timothy Price	Response
	Timothy Price timothy.key.price@valley.net 12/30/2009	[EDITOR'S NOTE: Comments submitted by e-mail.]
A	Hello, Have been looking at the photographs you have provided and learning about the National Mall Plan. We here in Vermont, the stone capital of the world, have lost our stone industry due to the quick fix that steel and concrete structures promise. Unfortunately, they do not make use local materials, labor, and do not last very long. We would like to see and believe that it would be in the best interest of the country if we were to begin to use stone bridges again.=Vermont and New York states have this week lost the Crown Point Bridge which is similar in size to this one, but was of steel and concrete.	A. Stone is an excellent material for use in memorials and other lasting civic structures such as bridges because of its beauty, strength, and enduring qualities.
B	Because it has been so long since stone arch bridges were built, there is not much knowledge nor awareness of these magnificent and durable works of art. So... when I saw your photographs of this bridge, without any recognition, acknowledgment of it, nor even a mention of its existence, I was amazed, disappointed, and frankly, quite annoyed at this obvious lack of appreciation for a structure equal to any of the the monuments in Washington. Please, will you do something to make up for this omission? It would be very helpful if you would highlight the merits of this structure. It deserves at least as much attention, promotion, historic recognition, as anything else on the Mall, and perhaps even more. This bridge would be more suitable to serve as a replacement for the Crown Point Bridge. I wish this would be emulated there. It could be if the public and our leaders were to be educated as to their advantages of great beauty and permanence. thank you, timothy k. price fairlee, vermont	B. The picture you are referring to is of Arlington Memorial Bridge, which we agree is a beautiful example of a stone arch bridge. This bridge is managed by the neighboring national park system area, George Washington Memorial Parkway, so it is not directly addressed in the document.

Comment	Letter 74. Larry Powers	Response
	Dear Ms. Spain: I do not believe that it would be good for the country as a whole, for the National Park Service to perform the construction and maintenance projects laid out in this Plan, in the manner in which those projects have been proposed. Even if the National Park Service were to get every dime that they are requesting, and even if all projects were completed in accordance with the highest quality standards, the result would be the American People paying somebody else to do their yard work.If, as is stated in the Plan, the National Mall is a symbol of America and our Government, here in this Republic, then hiring a contractor to maintain "our front yard" merely perpetuates the image of a people who are ruled by their Government, or kept lulled to sleep by entertainments provided by that Government, rather than cultivating the image of a people who actively participate in the direction of that Government. urge the National Park Service to consider asking	[EDITOR'S NOTE: Comments submitted by e-mail.]
A	the American People to offer their own toil, in service to the beautification of the National Mall, as a symbol of their willingness to participate in, and to direct, their Government, itself. The "de-compaction" of the soil of just one of the grassy quadrangles nearest the Capitol, using volunteer labor and Roto-Tillers from across the country, would serve as an undeniable demonstration of the civic pride felt by our population, and of the willingness of our citizenry to perform whatever "heavy lifting" should be required of citizens of a Republic, in whatever aspect of civic life in which such effort is needed. A year or so ago, when the Potomac River flooded and news reports suggested that the Mall might be in danger, I walked from my home, then in Silver Spring, to the Jefferson Memorial. I walked, because I lacked a car. Yet I brought food and water enough to share, first-aid supplies, and a shovel, so that I might participate in any effort that might be going on, to build sand-bag barricades against the rising water. I cannot believe that I am the only citizen in this country who loves his land enough to be willing to expend his own effort and resources in pursuit of the preservation of the National Mall. The First Lady recently sent Christmas ornaments to public schools, all across the country. Students in those schools decorated those ornaments and returned them to the White House, for use on one of the Christmas trees there. That same willingness to participate in the beautification of this city may be cultivated and solicited in the interest of preserving and improving the National Mall. Boy Scout troops and DeMolay chapters across the country, at the very least, might embark upon efforts to demonstrate their capacity to perform professional-quality gold-leafing, for example. They could send examples of their work to the National Park Service, in hopes of being selected to participate in the refurbishing, for example, of the statues standing at Memorial Bridge, which were given to the United States as a diplomatic gift. Were a Jamboree or other youth group convention to be held in the Washington area, part of the itinerary might be to aid in the performance of landscape projects under the direction of the National Park Service. Even the reconstruction of dry-laid stone walls, along the Potomac, might be accomplished with the aid of civic groups, young and old. While the National Park Service is, indeed, a custodian of the National Mall and other national parks, major maintenance projects ought to serve as opportunities to enlist the aid and human effort of the actual owners of those properties. If there were a forest fire blazing in a National Park, part of the civic duty of any citizen in the area would be to make himself or herself available, to aid in combating that forest fire. If the National Mall requires periodic maintenance of an extraordinary nature, the citizens of this country can provide both the tools and the muscle required, in order to perform the majority of the work that needs to be done, under National Park Service oversight.	A. Volunteers do and will continue to play an essential role on the National Mall. As described in the *Draft Environmental Impact Statement* on pages 353–54, more than 30,000 hours are donated annually, with an estimated value of over $621,000. Volunteers include youth groups, school students, military groups, companies, and families, as well as individuals. Work ranges from skilled labor to cleanup, from painting and weeding to putting on programs. We appreciate your willingness to volunteer. The majority of projects proposed in the plan will require technical skills that volunteers may or may not possess. We envision that private donations will be an important means for undertaking approved projects on the National Mall, along with ongoing volunteer efforts.
B	The Mall is not supposed to be an Interstate highway that herds people through it by the fastest possible means; nor is it supposed to be some kind of pristine European or Asian park in which everyone must "keep off the grass". Because those grassy areas are supposed to invite people to walk on them, to play on them, and to roll around on them, while they are visiting this city, those areas do not need to look like the landscape of an exclusive country estate. But, while the impact of soil compaction cannot be denied, there is no reason that civic associations from across the country cannot descend upon Washington, each fall, to "Roto-Till" those grassy areas on some kind of scheduled, rotating basis. Everything that gets built is a maintenance issue; and the new construction that is included in most of the options considered, in the Plan, would only add new maintenance projects to the list whose completion the National Park Service is already hard-pressed to complete with available funds. I believe that what I am proposing, in my comments, here, is a good deal more creative than some other means have been, that seek to achieve the completion of those projects. Congress will always starve you, regardless of the reason. Why not, then, assume that the American People want to be treated as owners of this land, rather than as guests in their own front yard, with all kinds of expensive entertainments and lawn ornaments on display, for their amusement? Why not say, "Hey, we work for you. We can keep the grass cut and the flower beds weeded. But when the whole lawn needs Roto-Tilled, many hands make light work; we're the experts, but we need you to lend a hand."	B. The soil today needs to be restored so it can be cared for. Compaction may extend more than 2 feet deep, so more drastic measures than rototilling are required.

Comment	Letter 74. Larry Powers (cont.)	Response
C	The alternatives presented in the Plan appear to continue the "dis-connect" between the American People and "our" "front yard". The proposed renovations appear to "throw money at the problem" without increasing the ownership stake of our citizens in maintaining, more than the National Mall, the Republic, itself. The United States of America, if it is to remain a Republic, cannot be populated by a citizenry unwilling to perform their own lawn maintenance. I ask you to reconsider the substance of the Plan for the National Mall, so that its achievement will make the Mall a symbol of a reality that we can all be proud of. A reality in which the citzens of this country rule, rather than being ruled. A reality in which the Government provides expertise, opportunity, and, sometimes, inspiration, rather than an insistence that the citizens of this country just shut up, pay taxes, and take what we're given.The National Park Service can, even in the proposals it puts forward, regarding the National Mall, assist in the development of a body politic that is capable of serving responsibly, as a citizen of a Republic should; not only the public interest, but the private interest, also. By so doing, the employees of the National Park Service would be acting in accordance with the oath of office taken by each employee of the National Park Service, upon his or her appointment to his or her first Federal Government post. Sincerely, Larry Powers	C. As stated in response A to your comment, volunteers will continue to play a crucial role on the National Mall, and we hope that role will expand. We can explore providing daily postings of cleanup/fix-up activities on the National Mall as opportunities for visitor participation.

Comment	Letter 75. Jean Public	Response
	 jean public <usacitizen1@live.com> 12/25/2009 05:38 PM To <susan_spain@nps.gov>, <info@taxpayer.net>, <media@cagw.org> cc bcc Subject public comment on federal register eis 2009 0432 i do not think the taxpayers should be spending billions on this national mall at this time. the mall is good enough and can exist as it is right now for a while. americans have no food,no homes,no medical care. the national mall can wait for repairs. jean public 15 elm st florham park nj 07932	[EDITOR'S NOTE: Comment submitted by e-mail.]

Comment	Letter 76. Tom Rampulla	Response
	Tom Rampulla (TomRamp03@aol.com) 2/17/2010 [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")] The National Mall should be the shining gem of our nation's capitol.	[EDITOR'S NOTE: Comment submitted online.]

Comment	Letter 77. Jerry and Peg Schubert	Response
	Jerry & Peg Schubert <jerryandpeg.schubert@gmail.com> 02/19/2010	[EDITOR'S NOTE: Comment submitted by e-mail.]
A	Leave the dimensions of the reflecting pool as they are.	A. If you are referring to the Lincoln Reflecting Pool, it is being rehabilitated and the dimensions will stay the same. There is a proposal to reconsider the size of the Capitol Reflecting Pool.

Comment	Letter 78. Sarah Simmons	Response
	Sarah Simmons <simmonssarah@sbcglobal.net> 12/19/2009	[EDITOR'S NOTE: Comment submitted by e-mail.]
A	What SPECIFICALLY organization(s) is behind this?	A. The National Park Service prepared the plan. In 2005 Congress directed the National Park Service to prepare a plan for the National Mall to preserve its character, and the planning effort began in November 2006.

Comment	Letter 79. Brian Simpson	Response
A	Brian Simpson (bas85310@yahoo.com) 12/22/2009 Free speech zones and unlawful assemblies have no place, no place in a democratic republic. Any non-violent assembly, any form of speech is protected by the United States Constitution as legal and shall not be obstructed by law enforcement because the sanctity of the state may come under threat. The state, which is the formation of the citizens within the state, have the power and authority to challenge the legitimacy of the state at any time. The oppression and repression of the state and law enforcement directed towards citizens movements may be effective towards quelling dissent in the quest of the state at protecting its power, however, actually, [expletive deleted] however. Continue your march towards fascism, dictatorship, oligarchy, police-state; but do not be fooled that you are performing any act that is the realm of justice, humanity, decency, morality, civility, freedom, democracy, equality, or fairness. You may be convincing the entire (misinformed) public that law enforcement has the right and duty to protect private property of the rich and powerful, while the rest of us fight for table scraps, but I will not be fooled. My brothers and sisters of mother earth will not be fooled either and when the lines are drawn in the sand, should you not align yourself with us, you will be treated with the same contempt that you treat criminals and terrorists.	[EDITOR'S NOTE: Comment submitted by e-mail.] A. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall." The First Amendment and civic space is an educational topic identified in the *Draft Environmental Impact Statement* (see pp. 85 and 172, actions for row 6.2). To emphasize the importance of the First Amendment, a new NPS brochure, *The First Amendment on the National Mall,* was issued in April 2010 and is available. It highlights key sites for free speech and includes cell phone tour call-in numbers for six locations.
Comment	Letter 80. Jon Spinac	Response
A	Jan 27, 2010 National Mall Plan To Mall Plan, I am writing to you to express my opposition to any proposals to restrict the use of the National Mall for demonstrations. The Mall is vitally important for expressions of political protest in this country, and I demand that its use remain unrestricted for such purposes. Sincerely, Mr. Jon Spinac 29 E 22nd St New York, NY 10010-5303	[EDITOR'S NOTE: Comment submitted by fax.] A. We agree on the importance of the National Mall as a venue for political speech. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."

Comment	Letter 81. R. Steffens	Response
	steffensr@comcast.net 03/14/2010	[EDITOR'S NOTE: Comment submitted by e-mail.]
	Dear Sirs:	
	I appreciate the opportunity to provide my comments on the National Mall Plan – I base some of my comments based on observations made while working in WDC for over 20-years, serving for several years as a volunteer as an Information Specialist with the Smithsonian, several years as a volunteer guide with U.S. Capitol Guide Service, and several seasons as a paid tour guide with TourMobile.	
	I would like offer the following comments:	
A	• I support the idea of cancelling parking on 3rd, 4th, and 7th Sts between Independence and Constitution. However, I also support banning parking on Jefferson and Madison Drives. This for several reasons – it has turned into a free parking area essentially for federal workers who work in the area. This coupled with number of children who play when on the NM who are not aware of the traffic – they are there to have fun. Having worked as a police officer in a resort community – many car-pedestrian incidents were a result of inattention on the part of vacationing drivers and kids not paying proper attention. I suggest that J&M Drives be used for the discharge of tourist from buses (buses to move on), the transit of Tourmobile, and the transit of museum support vehicles. Private vehicles should be banned. Atlantic City, NJ has developed a system that accommodates tourists and the buses – buses drop off and pick up on a schedule – the buses do not park in the casino areas – pickup times are scheduled and buses are not permitted to circle the streets looking for those who failed to meet the bus. This may sound harsh – it beats the traffic snarls – granted that AC doesn't have a large work force.	A. The *Draft Environmental Impact Statement* states there is a need for additional tour bus management work (p. 168). The *Visitor Transportation Study* referenced throughout the plan proposes metered parking on Madison and Jefferson drives to make parking more available for visitors.
B	• Street vendors – I know several years ago that vendors were removed from the NM – only to haunt the adjacent streets. They are still an eyesore, if not overpriced the quality of their respective merchandise remains questionable. I believe that some coordination with DC officials can better regulate this. Without officially sponsored food/beverage vendors on the NM – these folks provide a valuable service at somewhat inflated prices. If the NM will become a tourist friendly area – I suggest that food/beverage prices not be that of highway robbery.	B. Better dispersal and additional food service options are proposed in the *Draft Environmental Impact Statement*. The National Park Service does authorize concessions on the National Mall, and prices are to be comparable with those at surrounding facilities.
C	• The proposal regarding renaming the WMATA Metrorail stops – is short sighted. There isn't tourist one that does not focus on getting to SMITHSONIAN station – that doesn't need be renamed or enhanced with NM – other stops need to be better ID'd L'Eflant Plaza – NM East – (Air&Space, Hirschorn, NMAI,) are closer to L'Eflant Plaza – than to SI stop – if coming from VA it is less Metro stops – I have directed literally thousands of folks waiting at Metro platforms in VA – waiting for the Blue Line because it says SI – and the Yellow train moves through essentially empty. Navy Memorial – McPherson Square – Farragut West, Federal Triangle, etc also are close to many tourist destinations. As a tour guide I would advise tourist wanting to visit the National Zoo – to go the Cleveland Park Station – why? With kids, strollers, and wheelchairs – the NZ is downhill from Cleveland Park – and after visiting the NZ – go to Woodley Park/NZ – it is also downhill from the NZ. The NZ is eqi-distant from both stops.	C. The pedestrian guide system under development will help visitors on the National Mall better find multiple Metro stops. However, adding the name of the National Mall to the Smithsonian would increase visitor information.
D	• When the enhancements occur the criminal element will not be far behind – police and other assistance need to readily available and indiscreetly visible. This to include medical support based on the NM. Having worked in a major theme park chain as a paramedic – I know the importance of having qualified help (medical/security) close at hand – but indiscreetly. Having watched the homeless and undesirables make camp on ventilation grates, doorways of federal/commercial building in the NM area – enhanced tourist facilities will also become homeless shelters, – an enhanced security presence will be demanded.	D. The preferred alternative recommends a number of best practices, including crime prevention through environmental design, that can help address the issues you raise. This includes seating not conducive to sleeping or skateboarding, plant material of a certain type and height, and facilities designed to withstand vandalism.
E	• The Plan discusses "deferred maintenance" – isn't deferred maintenance and timely upgrades a primary reason why the NM has fallen into the state of disrepair that is now in. Timely maintenance will serve to keep the long-term maintenance and replacement at a reduced cost and manageable level.	E. Aging infrastructure is a significant component of the deferred maintenance cost.
F	• Tours on NM – I have been trained by SI, the Capitol Guide Service, and Tourmobile – as to the NM and surrounding areas. Tourmobile, sponsored by the Department of Interior, has an advantage as it can traverse M&J Drives has access to Arlington National Cemetery, and has a dedicated narrator. However, their equipment is outdated and inferior – there are other services that have superior/ modern equipment – they only lack a dedicated narrator and access to deal directly with the visitors. It is time this service be upgraded.	F. The *Visitor Transportation Study* referenced throughout the document is about a replacement system.

Comment	Letter 82. Doug Stone	Response
	Doug Stone stoneda70@hotmail.com	[EDITOR'S NOTE: Comment submitted by e-mail.]
A	I just finished reading the article in todays Examiner, and, have a few comments. Please don't mis-understand, I'm not trying to be disrespectful or otherwise do I claim that I'm intimately familiar with NPS processes. However, I do solicit your logical aproach to my comments. My father visits me (in King George, VA from Indiana) from time to time and we always somehow end-up walking through the mall. The same remarks emerge every time - what happened? Reportedly, the National Mall was pristine in the 1960's, the grass was green and things were generally in excellent order. However, the topic always turns to our agreement, that the greatest nation in the world is incapable of maintaining it's showcase property. How is that?	A. The level of use on the National Mall has increased dramatically since the 1960s as a result of new memorials that have been added and a large increase in the number of and attendance at events. Balancing use and preservation is challenging, and as described in the *Draft Environmental Impact Statement*, many problems have contributed to the deterioration of the National Mall's appearance. NPS staff do undertake regular maintenance operations, along with recurring, preventive, and corrective maintenance actions as needed (see DEIS, p. 349). By the time that this planning effort began, deferred maintenance was more than $450 million.
B	How about this approach, which contains good ole' American pride and value - Lets try to maintain the property we own first, then think about any possibilities of modernizing later, after we've proven that we can handle the existing required maintenance with a long term plan. That thought contains the most basic maintenance principal that many of us use on a personal basis. It's also a practice used by our Nuclear Submarine Force that I retired from and has worked quite well. Otherwise, we as taxpayers, are throwing money at something else that will turn sour over the course of several years. In short - scrap the shocking "lets go buy a new house" ideas..and lets try to maintain what we've got first. By the way - when will the WWI memorial be fixed...and maintained in good condition for the next couple hundred years? We've failed at that so-far, so what makes us think we can add a bunch of other stuff and hope it's maintained? Whaaaaat? the funding process doesen't support such maintenance sustainment? If someone needs help, call Kokomo Indiana, or maybe Detroit. I hear some folks out there know something about maintenance principals...	B. Restoration of the D.C. War Memorial, which was funded by the American Recovery and Reinvestment Act, is scheduled to begin in the fall 2010.

Comment	Letter 83. Cornelia Strawser	Response
	Cornelia Strawser (strawsercj@aol.com)	[EDITOR'S NOTE: Comments submitted online.]
	[Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")] The presentation is long, complicated, and hard to deal with, but as best I can tell without devoting the next week to it, it preserves the good and improves what needs improving. [Comment pertaining 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?")]	
A	One thing not clear to me was what happens to the carousel--it should very definitely be kept. I think the preferred alternative keeps the Folklife Festival which I likewise think should be kept on the Mall. I don't want the Mall to be exclusively a place for political demonstrations. [Comment pertaining to question 6 ("Is there anything else you think NPS needs to consider with respect to the Draft National Mall Plan?")] I love the new emphasis on the great Grant Memorial and shrinking the pool. Please keep the carousel and the folklife festival as well as the staging area for political demonstrations--all are important. And preserve the great vista.	A. The carousel would remain under the preferred alternative, and the agreement with the Smithsonian Institution would be updated (see DEIS, pp. 90 and 208, actions for row 11.6 under "Visitor Recreation").

Comment	Letter 84. Gary Thompson	Response
	Gary Thompson (garycheri@pacbell.net) 12/19/2009 [Comment pertaining to question 1 ("Indicate the extent to which you agree with the overall Preferred Alternative Vision to restore the National Mall.")] Upon reading each alternative, I favor the "Preferred Alternative" because it best employs all the best features. [Comment pertaining 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?")] It seems most sensible to me. [Comment pertaining to question 3 ("Indicate the extent to which you agree with the description of how the Preferred Alternative (which is also the environmentally preferred alternative) compares with other alternatives in meeting National Environmental Policy Act goals.")] Simply the best way forward	[Editor's Note: Comments submitted online.]

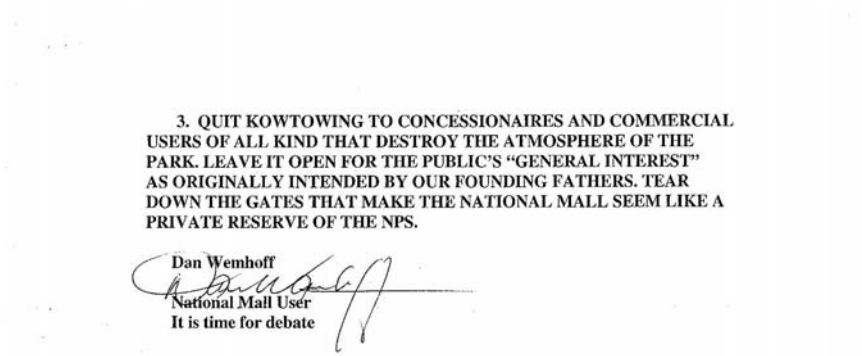
Comment	Letter 85. Carol Trainer	Response
	Carol Rawert Trainer <CRawertTrainer@insightbb.com> 01/03/2010	[Editor's Note: Comments submitted by e-mail.]
A	I recently received a dvd of the Draft National Mall Plan and Environmental Impact Statement. I want to say that this promotion seems to me to be a **great waste of taxpayer money**. It could have been better done via the internet instead, saving lots of money and making it easier for people to see and understand. And secondly, all the pdf files were very confusing and time intensive. Not many people will view them all. We have too many other problems facing this country now that need taxpayer money. This seems almost sinful to do this.	A. You received a copy of the *Draft Environmental Impact Statement* because your name was on our mailing list, indicating that you had contacted the National Park Service about the National Mall plan during the planning process. The plan was online, and notices were sent to our e-mail list about online availability.
B	Also, I do not like the plan that has the shape of the cross. This is a nation of many religions, not just Christians, and I think this is a bad decision. I love the national mall the way it is now. The two improvements I think are needed is more public bathrooms and better access to bus/metro lines. sincerely, Carol Rawert Trainer Prospect, KY	B. The great cross axis is part of the historic design for what we now call the National Mall, dating to the original design by Pierre L'Enfant in 1791 and the McMillan plan 1901–1902. It is not religious but a design element that expresses crossing vistas and viewpoints.

Comment	Letter 86. John Truesdale	Response
	Jan 5, 2010 National Parks Service / National Mall Plan Dear National Mall Plan, I am writing to comment on the NPS "Preliminary Preferred Alternative" plan for the reorganization of the National Mall. I ask that the National Park Service guarantee that there will be no new restrictions on the time, place or manner of use of the National Mall for free speech activities. The Mall is an historically important location for free speech in the Nation's Capital. I support the Partnership for Civil Justice Fund's 8 Point Plan to Protect Free Speech and Dissent on the National Mall and request that the NPS affirmatively agree to these points in any final plan. Sincerely, Mr. john milus truesdale 2131 Lead Ave SE Albuquerque, NM 87106-4007	[Editor's Note: Comment submitted by fax.]
A		A. We agree on the importance of the National Mall as a venue for political speech. As has been repeatedly stressed in this planning process, the National Park Service does not propose limiting First Amendment rights or restricting demonstrations to specific areas of the National Mall. Rather, First Amendment gatherings will be enhanced by the plan, and demonstrations will continue to occur throughout the National Mall, as they do today and in accordance with the regulations at 36 CFR 7.96 (see DEIS, pp. 16–18). Indeed, the importance of First Amendment demonstrations is repeatedly emphasized throughout the document; for example, see pages vi, viii, 10, 70, 160, and 303–5. As stated in the "Summary" on page vi, "The National Mall is the most prominent space in our country for the demonstration of First Amendment rights, and that is an essential purpose of the National Mall. Consistent with the First Amendment and federal regulations, demonstrations will continue to be fully accommodated on a first-come, first-served basis throughout the National Mall."

Comment	Letter 87. Daniel Wemhoff	Response
A B	**LAW OFFICE OF DANIEL WEMHOFF** **Dan Wemhoff** **4600 S. Four Mile Run Dr. #831** **Arlington, VA 22204** **(703) 589-2199** **e-mail:danwem@yahoo.com** **National Mall Plan** **c/o Deryn Goodwin – Planning div.** **National Park Service** **12795 West Alameda Parkway** **Denver, CO 80225** **National Mall Plan Att: Susan Spain,** **Project director** **National Mall & Memorial parks** **900 Ohio drive, SW** **Washington, DC 20024** **February 20, 2010** **PUBLIC COMMENT-NATIONAL MALL PLAN** Let me state as follows before entering my disagreements and/or ideas for a better National Mall, National Park Service Director Jon Jarvis misstatement: "For the first time, the National Mall would be prepared for many different uses- … First Amendment demonstrations, and other activities." Contrary to Mr. Jarvis, the National Mall, in particular, the area that is now before the Commission (use of the Reflecting Pool for protesters, etc.) always held "First amendment demonstrations", even before the Martin Luther King, Jr. rally in 1963, on to through the anti-Vietnam era, etc. It is this very governmental agency, with others, who instead tampered with this "democratic protest grounds" and help diminish by the construction of the World War II Monument built in the path of "First Amendment demonstrations" on the grounds of the Lincoln Memorial. We sued in *Wemhoff v. Bush*, 167 F.Supp. 2d 32 (D.D.C 2001 to keep this area open and available for demonstrations. The Court there recognized that "the National Mall has long been recognized as a unique public forum in which 'the constitutional rights of speech and peaceful assembly find their fullest expression." at 34. Yet, the NPS did not support our effort or make clear to the Commission and Congress approving it, that once the WWII Memorial was built it would then be unable to approve permits for the large crowds of "peaceful assembly" that once appeared on the National Mall historically. Instead, it quietly ducked this obligation and the Congress went along with it as well as the courts.	A. The statement by NPS Director Jarvis is accurate. The National Mall was never planned or designed for the levels of use it now receives. As you point out, one of those uses is as a public forum. The *Draft Environmental Impact Statement* says on pages viii and 83 that "the National Mall, as the premier civic space for our nation, would be refurbished so that very high levels of use could be perpetuated." B. It appears you may be confusing the Capitol Reflecting Pool and the Lincoln Memorial Reflecting Pool. Under the preferred alternative the Capitol Reflecting Pool at Union Square would be replaced (see pp. 88–89 and 196, actions for row 10.5). The Lincoln Memorial Reflecting Pool is currently being rehabilitated under the American Recovery and Reinvestment Act, with no change in configuration, size, or use (see DEIS, pp. vi, 20, and 362).

Comment	Letter 87. Daniel Wemhoff (cont.)	Response
C	Now we come to find out from the NPS and Commission looking for "comment" that the premise of availability for the historical crowds who assembled there that the WWII is now an impediment to peaceful assembly recognized by the court in *Bush*. The National Mall at the Lincoln Memorial has curtailed First Amendment assembly. It is for this reason that the NPS now seeks public comment to see if the public will go along with a program to scale back the Reflecting Pool (which belongs to the Lincoln design) so that protesters can be accommodated as in years' past. NPS always impressed the public with the fact that the WWII Memorial would never impact on assembly. Now it has changed its mind and wants us to approve the partial destruction of the Lincoln site at the Reflecting Pool. We must say "no" to this scam.	C. The size of the Lincoln Memorial Reflecting Pool is not being changed.
D	Whereas hundreds of thousands of protestors were accommodated in the past on issues of national concern has resulted in restriction on permits granted for the use of the Lincoln area, it appears, because now the unfortunate site for the WWII Memorial impedes peaceful assembly. There has been no assembly there since the construction of the WWII Memorial, at least not in the numbers before seen for anti Vietnam rallies, etc. So now that we can't move the WWII Memorial, the idea set forth by the NPS for your approval is: Let's destroy the Reflecting Pool which would impact further on the Lincoln Memorial design. (Although that design was compromised when the Rainbow Pool was eliminated for the WWII Memorial). We need to give far better thought about what needs to be done in lieu of this frivolous scheme. Instead of destroying part of the Reflecting Pool we need to manage its usage during times of great protests and 1st Amendment exercises. Some contractor is equipped to find a way to cover the pool sections or drain it for vast demonstration needs. Or, it can simply be left as is during summer months and let the overflow crowds wade in it as many times before. It has also been learned recently that the Park Service has the ability to drain this pool to lower levels to guarantee greater skating access during Winter months like the one upon us but, needles to say, nothing has been done to give the public greater access to winter activity so badly needed in a Capital beset with bureaucrats unfamiliar with the advantages of athletic activity.	D. Covering the Lincoln Memorial Reflecting Pool, as you suggest, for vast demonstrations could accommodate around 53,000 people at 6 square feet per person. Delivering and installing such an enormous amount of staging would consume a great amount of time, affecting the experiences of a great many visitors. We believe that permit holders and visitors like the reflective nature of the Lincoln Reflecting Pool, and venues are partly selected for the memorials that are highlighted. Moreover, other areas of the National Mall can fully accommodate scores of participants. For the largest public gathering, the 2009 Presidential Inauguration, several hundred thousand people were accommodated without using the Lincoln Reflecting Pool. Covering the pool could potentially result in damage to the pool structure. This idea would pose significant logistical, technical, and environmental challenges that would need to be overcome by event sponsors.
E	The Park Service has simply exhibited no vision to offer greater general and athletic usage of this National Mall and should not be counted on to do anything constructive to keep it open for its variety of users and the fact it was built for the "general interest" of the public. "Do Not" has been the theme of the season in NPS jargon. NPS has for too long hunkered down, closed off its water fountains when they can be used in the Winter contrary to the manufacturer, Most Dependable Fountain's (MDF), and have done everything within its power to thwart skaters when the ice has been over 3 ½ thick on the Reflecting Pool and Constitution Gardens nearby. They simply will not open these areas when skaters are already skating on a much deeper Canal Square during those same periods the Reflecting Pool and Constitution Gardens is closed to the skating public. This happens year after year. In fact, it now turns out they cannot even plow the central pedestrian and running lanes of the National Mall during heavy snow where the Smithsonian has the plowing equipment, its giant revolving brushes which could be used	E. The preferred alternative in the *Draft Environmental Impact Statement* proposes that Union Square be redesigned to meet some of the seasonal recreational uses you propose in a location that is more accessible by transit to the general public. Constitution Gardens Lake is also available for natural ice skating when conditions allow.

Comment	Letter 87. Daniel Wemhoff (cont.)	Response
	if only the NPS would get their gear out there and plow it down to a few inches from the surface. Instead, the NPS has sat around doing nothing to help those struggling with the treacherous icy footpaths this past month after three (3) gigantic storms that have built more than 2 feet of snow on the National Mall's pathways.	
F	I, like many, who know the poorly run Mall and its lack of openness do not believe the NPS is up to the job of telling the public what we can or cannot do with it. So let's keep our other government officials, including Congressmen such as Jim Moran of Virginia who runs the NPS budget, informed as to what we think of these "owner" officials earning well over $100,000 a year who are not capable to manage this property as George Washington intended it to be made available for the "general interest" of the public. It is certainly not meant for more concessionaires to appear on every tree corner and in the proposed Constitution Garden site where the original plan for the WWII Memorial was set. Instead, the NPS continues to curry favor with the commercial operations to the detriment of all of us. They string fences all over the place as though it is their private domain to protect these private interests and ignore the general public. While playing favorites to the commercial ventures the same rules do not apply to making available these sacred grounds for the use of the general public and First Amendment activity: We must further destroy the area the NPS claims. "We need to cut off the Reflecting Pool to allow more room for First amendment demonstrators" we knew would suffer once the NPS and others got their way with the WWII Memorial which was scheduled to be snugly fitted into the Constitution Garden scheme.	F. The plan proposes better meeting the needs of visitors by providing facilities such as restrooms, food, information, and services. Appendix D (DEIS, pp. 571–75) discusses park facilities policy guidance and best practices.
G	· Instead of more concessions at every tree corner, let the tourist and others get physical exercise and walk to a food stands everywhere and leave that pristine area alone for strollers, those wanting to lie down and relax by the water below, the students from nearby George Washington University who study there almost year around and the runners who make their way through the trees in the Gardens. How dare these so-called protectors of the National Mall seek further destruction and concessions to put more areas off limits only to make up for their mishaps of past construction. I invite you to make your comments and have a voice right here so we can force the issue with Congress if NPS cannot come up with better choices. Let's keep this Mall as open and useful as we can without the strangulation ad finitim.	G. All the uses you propose — walking, relaxing, studying in the pleasant environment, and running — would continue to be accommodated and conditions would be improved for these uses.
	TO RECAP:	
H	**1. NO FURTHER DESTRUCTION OF THE LINCOLN MEMORIAL DESIGN AS ALREADY DONE WITH THE WWII MEMORIAL**	H. Please see response B to your letter.
I	**2. LEAVE THE REFLECTING POOL ALONE EXCEPT FOR HAVING TO COVER A SECTION FOR PROTESTERS IF WINTER. LET PEOPLE WADE IN THE SUMMER OR DRAIN IT. IT IS ONLY 2-3 FEET DEEP. OPEN IT FOR SKATERS BY DRAINING IT FOR 2-3 MONTHS OF THE WINTER SO THAT IT WILL FREEZE OVER QUICKLY AND ALLOW WINTER SPORTS TO FLOURISH.**	I. Please see response D to your letter.

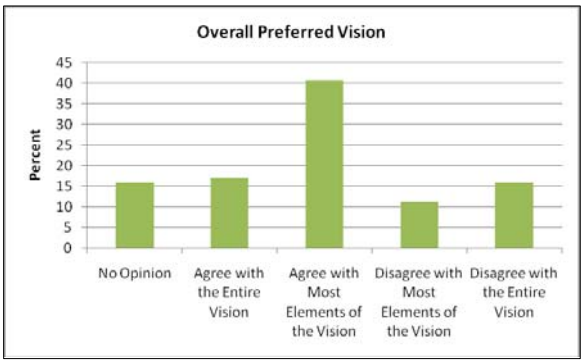
Comment	Letter 87. Daniel Wemhoff (cont.)	Response
J		J. We disagree. The National Park Service manages its park areas and deals with its concessioners and any commercial users based on its statutory and regulatory authorities.

Comment	Letter 88. Lindsley Williams	Response
	Lindsley Williams 3307 Highland Place NW Washington, DC 20008 LWilliams@his.com 3/11/2010	[EDITOR'S NOTE: Comments submitted by e-mail.]
A	I urge that the proposed plan be adopted with minor modifications as needed to: Ensure that the original alignments of the rights of way of both Virginia Avenue NW, Virginia Avenue SW, and Louisiana Avenue NW are respected in the overall plan that is ultimately approved, wherein each would be protected from development that would impair their view corridors. As part of this, the two segments of now-unnamed roadways connecting 14th and 15th Streets on the Mall just east of the Washington Monument, which appear to lie in those rights of way but with curvilinear form, should be restored to their underlying linear axes whether for vehicular use or use by pedestrians -- and have their names appear at the intersections, restoring their identity, dignity, and "place" as part of the L'Enfant grid/MacMillan plans. The "Jefferson Pier," where the alignment of Virginia Avenue NW rotates slightly, due west of Washington Monument and due south of the White House, should also be made an explicit feature of the Mall Plan, the location where L'Enfant had hoped to place a memorial to George Washington.	A. Both streets you mention are outside the plan study area but are in areas covered by coordinated planning.
B		B. The roads you reference are one-way drives known as Madison Drive (west bound) and Jefferson Drive (east bound).
C		C. The pier marker is regularly interpreted in programs given by park rangers on the Washington Monument grounds.

APPENDIX: SUMMARY OF ONLINE SURVEY RESPONSES

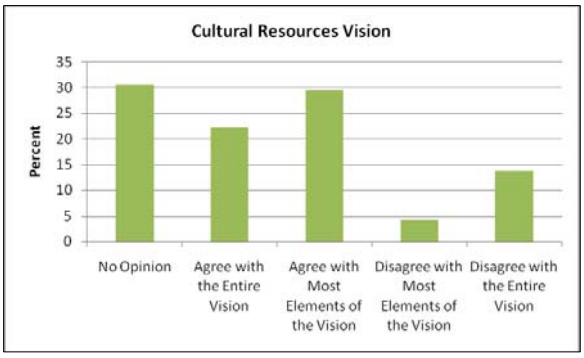
Question 1: Level of Agreement with Overall Preferred Alternative Vision.

	Frequency	Percent
No opinion	14	15.7
Agree with the Entire Vision	15	16.9
Agree with Most Elements of the Vision	36	40.5
Disagree with Most Elements of the Vision	10	11.2
Disagree with the Entire Vision	14	15.7
Total	89	100



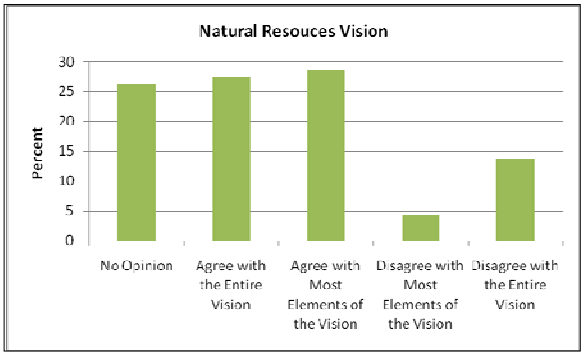
Question 2a: Level of Agreement with Cultural Resources Vision.

	Frequency	Percent
No opinion	29	30.5
Agree with the Entire Vision	21	22.1
Agree with Most Elements of the Vision	28	29.5
Disagree with Most Elements of the Vision	4	4.2
Disagree with the Entire Vision	13	13.7
Total	95	100



Question 2b: Level of Agreement with Natural Resources Vision.

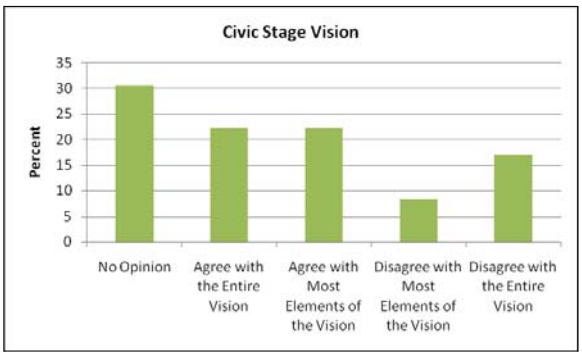
	Frequency	Percent
No opinion	25	26.3
Agree with the Entire Vision	26	27.4
Agree with Most Elements of the Vision	27	28.4
Disagree with Most Elements of the Vision	4	4.2
Disagree with the Entire Vision	3	13.7
Total	95	95



NOTE: Prepared for the National Park Service by Tourism and Events Management; School of Recreation, Health and Tourism; George Mason University, Manassas, Virginia.

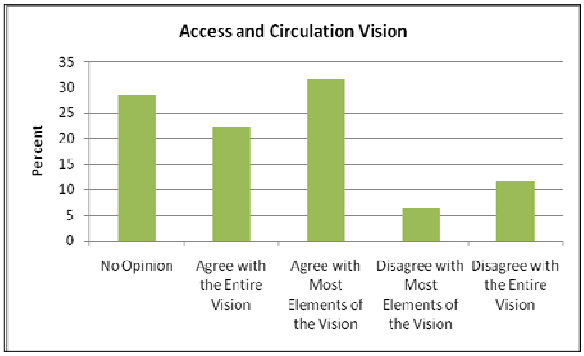
Question 2c: Level of Agreement with Civic Stage Vision.

	Frequency	Percent
No opinion	29	30.5
Agree with the Entire Vision	21	22.1
Agree with Most Elements of the Vision	21	22.1
Disagree with Most Elements of the Vision	8	8.4
Disagree with the Entire Vision	16	16.9
Total	95	95



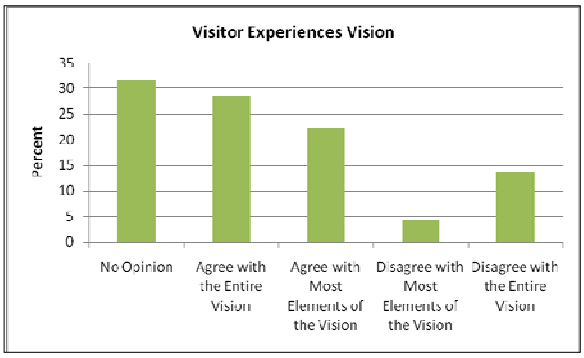
Question 2d: Level of Agreement with Access and Circulation Vision.

	Frequency	Percent
No opinion	27	28.4
Agree with the Entire Vision	21	22.1
Agree with Most Elements of the Vision	30	31.6
Disagree with Most Elements of the Vision	6	6.3
Disagree with the Entire Vision	11	11.6
Total	95	100



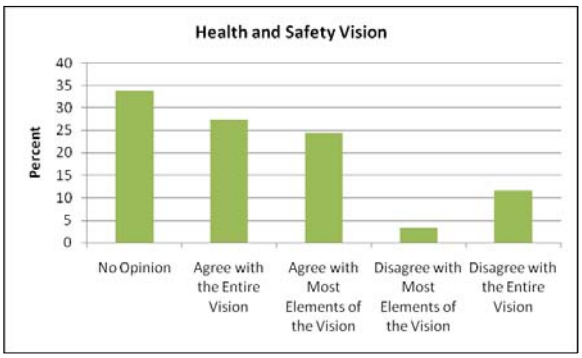
Question 2e: Level of Agreement with Visitor Experiences Vision.

	Frequency	Percent
No opinion	30	31.6
Agree with the Entire Vision	27	28.4
Agree with Most Elements of the Vision	21	22.1
Disagree with Most Elements of the Vision	4	4.2
Disagree with the Entire Vision	13	13.7
Total	95	100



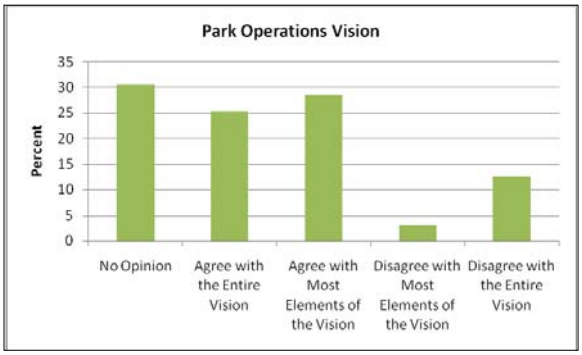
Question 2f: Level of Agreement with Health and Safety Vision.

	Frequency	Percent
No opinion	32	33.7
Agree with the Entire Vision	26	27.3
Agree with Most Elements of the Vision	23	24.2
Disagree with Most Elements of the Vision	3	3.2
Disagree with the Entire Vision	11	11.6
Total	95	100



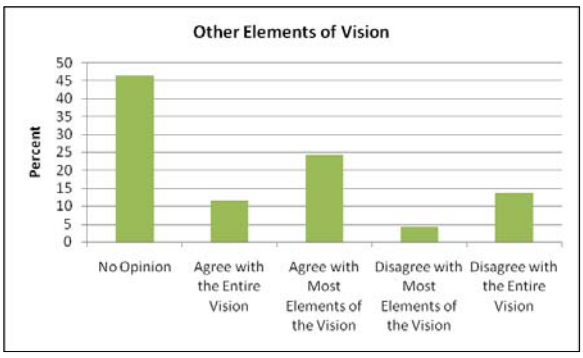
Question 2g: Level of Agreement with Park Operations Vision.

	Frequency	Percent
No opinion	29	30.5
Agree with the Entire Vision	24	25.3
Agree with Most Elements of the Vision	27	28.4
Disagree with Most Elements of the Vision	3	3.2
Disagree with the Entire Vision	12	12.6
Total	95	100



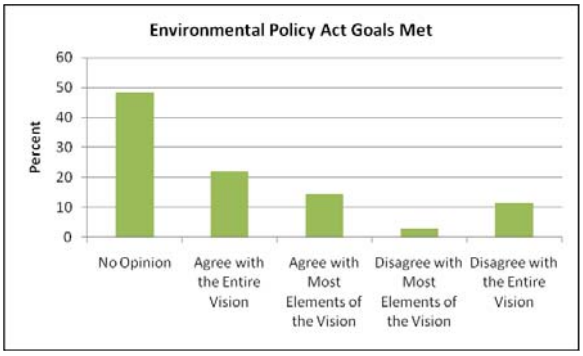
Question 2h: Level of Agreement with Other Elements of Vision.

	Frequency	Percent
No opinion	44	46.3
Agree with the Entire Vision	11	11.6
Agree with Most Elements of the Vision	23	24.2
Disagree with Most Elements of the Vision	4	4.2
Disagree with the Entire Vision	13	13.7
Total	95	100



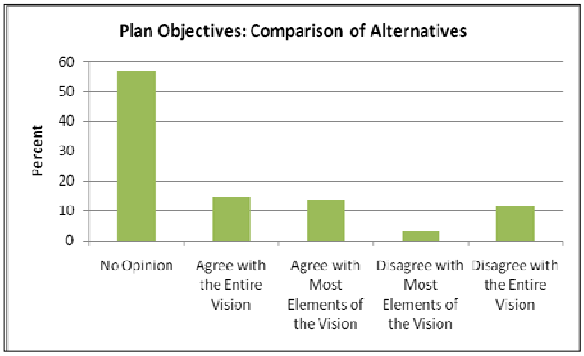
Question 3: Level of Agreement with Preferred Alternative in Meeting National Environmental Policy Act Goals.

	Frequency	Percent
No opinion	46	48.4
Agree with the Entire Vision	21	22.1
Agree with Most Elements of the Vision	14	14.7
Disagree with Most Elements of the Vision	3	3.2
Disagree with the Entire Vision	11	11.6
Total	95	100



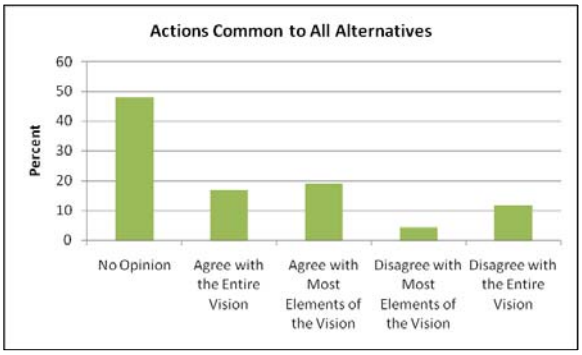
Question 4: Level of Agreement with Comparison of Alternatives as Associated with Plan Objectives.

	Frequency	Percent
No opinion	54	56.8
Agree with the Entire Vision	14	14.7
Agree with Most Elements of the Vision	13	13.7
Disagree with Most Elements of the Vision	3	3.2
Disagree with the Entire Vision	11	11.6
Total	95	100



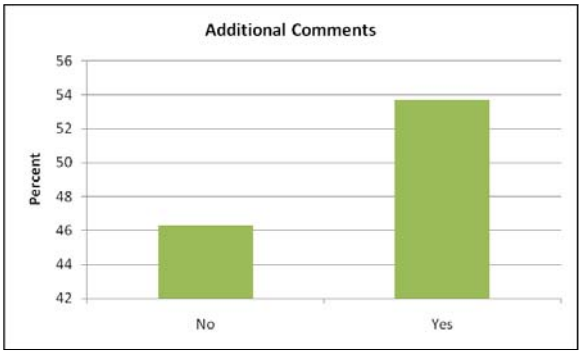
Question 5: Level of Agreement with Actions Common to All Alternatives.

	Frequency	Percent
No opinion	45	47.9
Agree with the Entire Vision	16	17.0
Agree with Most Elements of the Vision	18	19.1
Disagree with Most Elements of the Vision	4	4.3
Disagree with the Entire Vision	11	11.7
Total	94	100



Question 6: Do You Have Additional Comments?

	Frequency	Percent
No	44	46.3
Yes	51	53.7
Total	94	100



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As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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