



FINAL
NATIONAL MALL PLAN /
ENVIRONMENTAL IMPACT STATEMENT
VOLUME 2

THE NATIONAL MALL
Washington, D.C.

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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.

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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	<i>Code of Federal Regulations</i>
DBID	Downtown Business Improvement District
DDOT	D.C. Department of Transportation
DEIS	<i>Draft Environmental Impact Statement</i>
FHWA	Federal Highway Administration
FR	<i>Federal Register</i>
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	<i>United States Code</i>
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

Category / Theme and Subtheme	Frequency	Percent
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

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

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 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 NCP, 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; <i>Visitor Transportation Study</i> 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; <i>Visitor Transportation Study</i>

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.
 - 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.]

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)
 - 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
 - b. Natural Resources (water, flooding, soils, lawns/turf, trees, nuisance birds, health of the landscape, other)
 - 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
- 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 pro-

gram 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 liriopie 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 inter-relationships 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.