

NATIONAL MALL PLAN –SECTION 106

The following table contains comments from Section 106 Consulting Parties on the National Mall Plan Draft Alternatives Matrix of April 2008. Comment appearance varies, since they were copied from PDF versions of letters.

#	Source	Received	Location #=page # P=paragraph	106	NEPA	Section 106 Comment or summary	NPS Response
1.	NTHP National Trust for Historic Preservation	4/29/08	1, p2	X		In response to the National Park Service's request, the National Trust for Historic Preservation will work together with other consulting parties, including the Latrobe Chapter of the Society of Architectural Historians, the DC Preservation League, the Committee of 100 on the Federal City, and the National Coalition to Save Our Mall, to evaluate the Draft Alternatives Matrix. We believe that a shared response would 1) be most comprehensive and 2) best meet the National Park Service's need for an expedited consultation process. For this purpose, the National Trust requests an extension of the comment deadline to May 30, 2008. We also request a consultation meeting during the week of May 19 th , between the proposed May 7 th bus tour and the comment deadline, to discuss the Draft Alternatives Matrix and some of the issues raised in this letter.	In response to this request NPS provided a bus tour and held two optional meetings at park headquarters to help answer any questions – the mornings of May 2 and May 9 from 9am to noon. One consulting party attended on May 2; no one attended on May 9
2.	NTHP National Trust for Historic Preservation		1, p3		X	In testimony before the Committee on Energy and Natural Resources Subcommittee on National Parks in April, 2005 and in a January, 2007 letter following the National Park Service's scoping meeting regarding the National Mall plan, National Trust president Richard Moe has detailed our organization's position on master planning for the National Mall. In essence, we believe that the National Mall is such a complex and overwhelmingly significant historic resource that 1) any master planning project should involve a coordinated, multi-agency approach to the need for ongoing maintenance and minor design challenges; and 2) any major design changes should derive from a unified vision for the National Mall. This master plan would be based on a thorough evaluation of the evolution of the National Mall and its current condition, the needs of all relevant agencies, and it would include creative solutions to restore, enhance – and in some cases, allow for the first time – the seamless, extraordinary experience that visitors find inspiring and unique on the National Mall.	NPS much appreciates the NTHP position. a) Coordinated multi-agency approach is ongoing at multiple levels. Numerous federal and local agencies are coordinating agencies through NEPA. b) Design for major facilities is an expression of a unified vision for the National Mall. For projects to move through the NPS system they need to be included in a broad vision plan. c) Conditions and needs are continually evaluated d) Please continue to provide comment on how creative solutions protect historic landscapes or mitigate impacts
3.	NTHP National Trust for Historic Preservation		1,p4	X		National Park Service is charged to produce a master plan with its own resources, to meet immediate and foreseeable needs, within its agency jurisdiction. To that end, we appreciate the Park Service's willingness to consider the suggestions of several consulting parties at the April 16, 2008 meeting: 1) to identify the National Park Service's definition of the "National Mall" as a subset of the historic, symbolic core of the L'Enfant Plan and the McMillan Plan; and 2) to evaluate alternatives, especially major design changes, within this larger context. For the National Trust, this perspective and contextualization is essential.	1. The National Mall Plan deals with portions of the historic, symbolic core resulting from the L'Enfant and McMillan Plan 2. The DEIS analysis provides this analysis, section 106 comments help refine alternatives and analysis
4.	NTHP National Trust for Historic Preservation		2, p1	X		Clarify the undertaking Recommendation 1: Clarify the undertaking. Although we stand ready to help the National Park Service move forward with the National Mall plan, we request further clarification about the scope and goals of the project. We understand that the National Park Service's plan responds to the National Capital Planning Commission's <i>Legacy Plan</i> – a plan that we support and endorse. However, the scope of this current undertaking includes many critical details not addressed in the <i>Legacy Plan</i> , each of which require thorough and careful evaluation, given the significance of the National Mall. As we and others have mentioned in previous comments, a "master plan" implies the development of a larger-picture vision for the National Mall, where consideration of major changes (such as those proposed for Union Square, Constitution Gardens, and the Tidal Basin) would be appropriate. A "management plan" or "maintenance plan" would include primarily minor changes and a general refurbishment of resources on the National Mall. The plan as proposed incorporates both major and minor changes, which we believe must be treated differently. It would also be helpful to understand more about the National Park Service's priorities for this project, so that we can most productive in addressing the agency's immediate needs.	The National Mall Plan is an undertaking that addresses different levels of vision and specificity in order to provide a unified and coherent National Mall. This is neither a master plan nor maintenance plan. The undertaking addresses areas managed by NPS. The plan will identify additional design and compliance that would take place during plan implementation

5.	NTHP National Trust for Historic Preservation		2, p2	X	X	<p>Recommendation 2: Seek to develop at least three alternatives, each of which will preserve historic resources, provide for public enjoyment, and accommodate First Amendment demonstrations. We disagree with the statement on page 1 of the Draft Alternatives Matrix that "preserving historic resources, providing for public enjoyment, and accommodating First Amendment demonstrations" are potentially "contradictory" purposes of the National Mall. In our view, meaningful preservation of the National Mall is the preservation of the unified, symbolic core of green space and monumental architecture at the heart of the city. Features within this core have changed over time, in response to changing visions, changing needs and changing management; this evolution is also part of the historic character of the National Mall. Instead of freezing the National Mall in time, or treating discrete parcels based solely on historic precedent, we believe that the National Mall plan Section 106 consultation presents an opportunity to examine what really constitutes the historic and symbolic character of the National Mall as a whole, and to select alternative treatments based on what will reinforce, enhance, and promote that character. Those treatments should also provide for public enjoyment and accommodate First Amendment demonstrations. From at least three alternatives, each posing various options, a preferred alternative can then be developed.</p>	<p>Thank you for the comment on "contradictory purposes" – matrix language has been changed to talk of "multiple" purposes. Each of the three alternatives accomplish all the goals listed, but in different ways. The primary emphasis is different for each alternative. Concepts from each of the alternatives will be combined. The Legacy Plan, successor to the McMillan and L'Enfant Plans, provides a broad vision for central Washington. The related Memorials and Museums Master Plan supplements the Legacy Plan and guides NPS plans. These two documents dovetail with other plans for central Washington – the Framework Plan, Capitol Complex Master Plan, the Center City Action Agenda and the National Mall Plan.</p>
6.	NTHP National Trust for Historic Preservation		2, p3	X		<p>Recommendation 3: For the purposes of this planning project, consider the area of the undertaking a nationally significant historic resource. We share Congress's view, articulated in amendments to the Commemorative Works Act in 2003, that the National Mall Reserve is a "substantially completed work of civic art." It is also a nationally significant historic resource, but one that is difficult to evaluate as a traditional historic landscape or historic district. Although the National Mall is based upon the philosophies and structure of the L'Enfant and McMillan plans, these plans were never fully implemented, and the Mall has continued to evolve. We cannot and should not, therefore, seek to restore the National Mall to a specific design or period in time. Architecturally, the Mall is a collection of iconic buildings and monuments, each of which could be individually listed on the National Register, and each new museum or memorial becomes a critical and highly significant element of the National Mall experience. Even those individual elements that are less than 50 years of age, such as the Vietnam Memorial, would be considered eligible based on their "exceptional importance." Some of the major landscape features on the National Mall that are less than 50 years of age are considered to have a similar degree of historic significance. Many of the Mall's architectural features and landscape features are inextricably interrelated; this is also part of the historic character of the whole. In that context, what can be changed? What is sacrosanct? For structures or landscape features that could be altered, are there characteristics of the design elements that should be retained, based on historic and symbolic precedent? For each of these issues, the history of public use of the space must also be considered.</p> <p>Consider the area a national significant historic resource</p> <ul style="list-style-type: none"> a) Preserve unified symbolic core of green space and monumental architecture b) Evolution is part of character – not freeze in time c) Use Section 106 to examine what constitutes historic and symbolic character as a whole d) Select alternatives based on what will reinforce, enhance and promote character e) Major features less than 50 years old need to be considered f) Consider history of public use 	<p>NPS considers the area a national significant historic resource.</p> <ul style="list-style-type: none"> a) NPS assumes this comment would also include views b) NPS agrees – this has been emphasized by the SHPO and is fundamental to the Secretary of Interior's Standards for the Treatment of Historic Properties and Guidelines for Cultural Landscapes. c) NPS agrees and would like your assistance in defining that character comments to that effect d) This is one of many considerations that plan must consider e) NPS concurs f) NPS concurs – see "A History of the National Mall and Pennsylvania Avenue National Historic Park" posted online and handed out at Section 106 and public meetings
7.	NTHP National Trust for Historic Preservation		3, p1	X		<p>Recommendation 4: Differentiate between major and minor proposed changes. Planning for major changes to the National Mall would require considerable background information and time for adequate evaluation of alternatives. If adequate planning is not possible within the National Park Service's timeframe, we request that the agency narrow the scope of the project. Planning for minor changes (such as upgrades to paving materials, lighting improvements and standardization, and wayfinding signage) are far less controversial and would, in our view, be most easily achieved within the National Park Service's time constraints.</p>	<p>NPS plans identify major and minor actions because they set the future direction comprehensively. Major undertakings will require additional compliance.</p>

8.	NTHP National Trust for Historic Preservation		3, p2	X		Recommendation 5: Evaluate any proposed structures within the context of the architectural character of the National Mall; this “architectural character” requires definition. Food kiosks, restrooms and other visitor services could be classified as major or minor changes, depending on permanence, reversibility, and impact to historic resources. As improvements in visitor amenities appear to be a high priority for the National Park Service, we recommend that these issues continue to be included under the current planning effort. To what extent will the National Mall planning process guide future development? Is it limited to siting, or will it establish design guidelines for food kiosks, bathrooms, bookstores, restaurants, security posts and visitor service areas? Should new designs react more to immediate context or follow universal guidelines throughout the National Mall? What constitutes the immediate context? How should public use and movement — including current transportation options and potential changes to transportation and pedestrian access — affect the placement of amenities? Some of these issues are raised in the National Park Service’s Draft Alternatives Matrix, but it is unclear how we will address these important details within the context of Section 106.	NPS Management policy gives facility guidance related to issues brought up in this comment. Locations for facilities need to be identified in approved plans. The alternative matrix and affected environment summarize existing conditions or challenges and alternative ideas. Information about existing architectural character is contained in historic structure reports, cultural landscape reports, national register nominations and other National Mall documentation. The HSRs and CLRs will also provide guidance for siting, design, materials, and other more specific design elements. For some proposed actions more detail is provided about architectural character, size, etc.; for other areas defining a location and conceptual purpose/need for a potential facility is adequate. The draft and final plan will provide the analysis related to these topics. When the draft EIS is submitted for public review, reviewers will have the opportunity to identify those resources that should be described in more detail in the EIS. The alternatives matrix identifies locations and may give some additional information about character or size of a proposed or potential facility. This information may be useful to the analysis. Further consultation may be required as projects are implemented.
9.	NTHP National Trust for Historic Preservation		3, p3	X		Recommendation 6: Evaluate any proposed landscape changes within the context of the National Mall as a cultural landscape; the character of this cultural landscape requires definition. Certainly, elm trees, paving materials, and cherry trees are characteristic of parts of the Mall, as well as expanses of grass, and gravel pathways. Should these character-defining elements be restricted to one or more areas? Is there an opportunity for other symbolic plantings? What is the nature of the relationship and shape of current and historic water features, the use of ellipses, the transition between the formality of the grounds between the Capitol and the Lincoln Memorial, and the curvilinear landscape around the Tidal Basin? What should it be? Should there be a system of paving materials that define the Mall as a whole?	The cultural landscape of the National Mall is anchored in the two historic landmark plans for Washington DC - and comprises much of the great cross axis of open space. The boundaries of the undertaking have been identified. How the individual resources within that boundary form one overarching resource is an essential issue in this planning effort. This plan could recommend a unifying paving system throughout or identify a palette or palettes of plant types.
10.	National Trust for Historic Preservation			X		The National Trust does perceive a need for a larger vision for the National Mall, consistent with the grand design concepts of the past. Through the National Mall plan Section 106 consultation, we would like to better establish what comprises the historic character of the National Mall, and achieve consensus for which projects can be addressed through the limited current planning effort by the National Park Service, and which would be better left to a more comprehensive, far-reaching design or planning process. We want to be helpful in addressing the agency’s needs. At the same time, we are extremely sensitive to proposed changes on the Mall and strongly recommend a well-justified, rational, contextualized approach to both minor and major alterations. Following more discussion regarding some of these major preservation and design issues, we believe the Section 106 consulting parties may be able to offer reasonable guidance for specific treatments. Larger vision consistent with the grand visions of the past is a need. a) Through section 106 better establish what comprises historic character. b) Achieve consensus of what projects can be addressed. c) Seek a well-justified, ration and contextualized approach to major and minor alterations.	a) We concur – the Section 106 consultation should help define the historic character – As stated above, the NPS welcomes the consulting parties’ assistance in further identifying historic character, please see CLRs. HSRs and other documents that provide some of this analysis – on line. b) Section 106 does not define the undertaking– it provides comment on the impact to historic resources. NPS hopes the comments have provided clarification about the undertaking. c) NPS Management Policies require a contextualized and wholistic approach to planning. The NPS looks to other plans such as the Legacy Plan, as well as L’Enfant and MacMillan Plans to provide this larger context.
12.	Combined •1 National Coalition to Save Our Mall •2 Committee of 100	5/29/20 08	1, P1	X	X	As you know, some of the Section 106 consulting parties have requested additional information about the scope and priorities of the National Park Service for the National Mall plan. We are heartened by the list of priorities offered by Ms. O’Dell which we believe can be adequately addressed through this project, and request confirmation from the National Park Service that these are in fact the top priorities for the National Mall plan. To this list, we would add:	Superintendent O’Dell testimony listed the top four public comment topics. They are not the only issues that need to be addressed in planning. Actions to make improvements in some public concerns and to improve conditions are proceeding as part of normal park management. Other issues will be dealt with in the National Mall Plan. In those instances where they pose impacts on the cultural landscape and other historic resources, they will be

	<ul style="list-style-type: none"> ·3 NPCA ·4 NAOP ·5 NTHP, ·6 Latrobe Soc, ·7 DC Pres. League 					<p>Immediate short term priorities this project can address were articulated at May 20, 2008 hearing</p> <ul style="list-style-type: none"> ·1 Improve general appearance ·2 Improve signage ·3 More and better restrooms ·4 More and better food <p>Request confirmation from the National Park Service that these are in fact the top priorities for the National Mall plan.</p>	addressed as part of the Section 106 process.
14.	Combined ”	“	1, P2		X	<p>In addition we would add</p> <ul style="list-style-type: none"> ·1 Revised circulation, automobile, tour, pedestrian and bicycle traffic ·2 Revised plan to address temporary and permanent security, flooding and maintenance changes 	These topics are addressed in the National Mall Plan.
15.	Combined “	“	1-2		X	<p>Request for additional information related to:</p> <ul style="list-style-type: none"> ·1 visitor surveys and ·2 guidelines for waysides ·3 traffic studies, circulation studies and historic circulation plans and paving materials 	To the extent available, the information requested will be included as part of the analysis. Information about the NPS sign system can be found at www.hfc.nps.gov/uniguide/ . NPS has a programmatic agreement with the DCSHPO that provides for internal compliance review of the placement and installation of waysides and signs within park boundaries.
16.	Combined		2, p2		X	<p style="text-align: center;">While our organizations continue to support a long-term, “big-picture” vision and planning approach for the National Mall, we do not believe that it is possible to develop this vision solely within the National Park Service’s jurisdiction. Our concern is reinforced by the existence of multiple planning efforts (<i>e.g.</i>, the <i>National Capital Framework Plan</i>, the <i>Capitol Complex Master Plan</i>, and various Smithsonian undertakings) that will affect the National Mall, in the absence of this larger “vision.”</p>	NCPC’s 1997 <u>Extending the Legacy</u> plan was designed to provide the big picture vision for the nation’s capital. The NPS relies on the Legacy Plan to provide over all direction for the city and is working toward developing a plan that fits within that framework. NPS National Mall planning tiers off <u>Legacy</u> for the areas of the National Mall managed by NPS. Other plans tier off and reinforce the Legacy Plan for the areas under different jurisdictions as well as the Memorials and Museums Master Plan. These include the vision plans described in <u>Planning Together for Central Washington, DC</u> . Specific projects by agencies such as the Smithsonian Institution must also plan within the context established by the Legacy Plan.
17.	Combined		2, p3		X	<p>Major impact on the Mall</p> <ul style="list-style-type: none"> a) Eliminating the pool at Union Square b) Replacing Sylvan Theater c) Building substantial restaurants 	We understand this comment to state that three major impacts were identified to historic resources. We look to the consulting parties to help the NPS evaluate the likely effects resulting from the undertaking described in the preferred alternative.
18.							
19.	National Association of Olmsted Parks (NAOP)	5/19/08	1, p2			<p>Vision should come from L’Enfant and McMillan Plans – historic purpose and experiences (memorials, museums) and integrated through roads, natural systems, viewsheds and vistas.</p>	We concur that the vision should be grounded in the L’Enfant and McMillan Plans. The Legacy Plan carries forward these plans and provides the overarching vision for the NPS planning effort. We also concur that we must carefully consider effects on roads, natural systems, viewsheds, vistas, and other components of NAOP the cultural landscape that reflect the essence of these earlier plans

20.	NAOP		1, p3	X	X	<p>A vision statement – along with a set of guiding principles – would help direct the planning process, clarify the goals and scope of the undertaking and assist with prioritizing decision making and resource allocation. We hope the enclosed “Design Principles of Frederick Law Olmsted” might serve as a model for developing principles specific to the Mall planning process. Guiding principles should address circulation, natural and cultural resources, the visitor experience, symbolic relationships within and outside the Mall, and other factors laid out in the Matrix.</p>	<p>The NPS has identified guiding principles (See Newsletter 2, available online) as well as best management practices for the National Mall. The Olmsted principles are a succinct statement of many of these 21 planning principles developed by the multiple agencies cooperating with the NPS in the NEPA process. The Olmsted principles also correspond to ideas in the “Secretary of the Interior’s Guidelines for the Treatment of Cultural Landscapes”. These standards guide NPS activities nationwide. The standards have guided past and ongoing efforts on the Mall and will continue to do so in the future.</p>
21.	NAOP		1, p4		X	<p>NAOP recommends a more focused planning process, resolving large-scale, long-term issues which subsequently can provide the framework for addressing specific details. To facilitate decision-making, NAOP requests that a discussion about maintenance be addressed alongside the proposed changes. We would also like to review any studies and projections that drive proposed changes, i.e., long-term traffic studies that inform the proposed rerouting of traffic patterns; projected government building and workplace needs; and long-term Mall use and visitation projections guiding the design and scale of future food service, restroom and entertainment facilities.</p>	<p>Thank you for your comments relating to circulation, concessions, maintenance, visitor services and other development issues. Your comments will be carefully considered as part of the NEPA analysis for the plan. We also look forward to your comments on these issues once the NPS has a well-defined undertaking in the preferred alternative.</p> <p>GSA addresses work place and government building issues in the federal triangle, and in other federal buildings in the monumental core. Adaptive use of historic buildings is generally undertaken if building uses change.</p>
22.	NAOP		2, p2-3			<p>NAOP also recommends developing guidelines and strategies for recreational and entertainment use of Mall spaces that consider alternative or existing resources in the District, projected user groups and volume, and the concept of informal, multi-purpose spaces vs. those designed for single use. These considerations should be evaluated against the historic purpose and intended use of the National Mall.</p>	<p>NPS policies provide guidance for park uses and facilities. For example, in the park, Guideleines for Special Events at the Lincoln Memorial have been in place since 1996. Management Policies 2006 address park uses and facilities as well as many other topics. See www.nps.gov/policy/MP2006.pdf</p> <p>NEPA analysis looks at the need for facilities based on cumulative impacts of projects adjacent as well as within the study area.</p> <p>NPS has not proposed any central facility in any of the atlernatives.</p> <p>Concessions management plans would need to examine the feasibility of any proposals.</p>

						We are particularly concerned about design and placement of food service and restroom facilities and believe more information is needed with regard to the intended scale and capacity of a central facility in the western portion of the Mall. We also believe a decision regarding the central water	
23.	NAOP		2, p3	X	X	Mall. We also believe a decision regarding the central water feature at Union Square should be deferred until a comprehensive vision for the area has been developed.	NPS believes that a comprehensive vision for the National Mall has already been developed, based on the Legacy Plan and the Commemorative Works Act "Reserve" Amendment. The decision about Union Square will address a vision and general criteria without constraining future creative design solution.
24.	NAOP		2, p4		X	Support sustainable design and practices	We concur. NPS policy requires sustainable design for all new and rehabilitated facilities.
25.	NAOP		2, p5	X		Concept of open, unprogrammed space as a defining feature of this landscape should be a priority.	We concur. We believe the concept of open and unprogrammed space is incorporated in all alternatives.
26.	NAOP		attached	X		Design Principles of FL Olmsted	Thank you. These principles provide useful guidance and reinforce National Mall Plan principles as well as NPS policies.
27.							
	National Coalition to Save Our Mall	5/19/08				We are disappointed NPS has rejected the Trust's request for an extension of the comment deadline to the end of the month so that the various nonprofit groups involved in the Section 106 process could pool their resources to review the matrix. Our group meeting will not occur until later this week. We are submitting brief comments today and hope to send more detailed comments in coming days.	Noted. Group comments were addressed.
28.	National Coalition to Save Our Mall	5/19/08	1, p3			We are interested in hearing your response to Kelly Fanizzo's email of May 6 in which she asked for clarification about development of the first preferred alternative. Will it be a single approach, a narrowed down selection, and how broad will a preferred alternative be? It is difficult to know how to comment on the matrix without knowing what NPS is looking for as it moves forward.	A preferred alternative is similar in terms of content to the other alternatives. It is the governments preferred based on public comment, analysis, cooperating agency input, consultation, and cost-benefit ratio. It will include a description of what is desired in terms of overall vision and specific area visions fit within the overall vision. In some areas this description will be more specific than in others. A preferred alternative is not a design. While some actions may be able to proceed without further consultation, it is expected that further consultation will proceed as projects are undertaken. Projects needing further compliance will be identified in the draft or final plan. It is important to note that projects need to be within a vision plan to get NPS approval for implementation and funding. This includes projects that could have significant funding from private/public partnerships or private sources.
29.	National Coalition to Save Our Mall		1, p4	b-X	a and c X	We have three concerns that came out of the bus tour which we believe should be addressed and clarified as soon as possible, and certainly in advance of the next 106 meeting: 1. The need for integrating the matrix with transportation and other issues and discussing them in the 106 process before a preferred alternative is developed by NPS, 2. The confusion about which historic plans and properties are to be considered as "contributing elements" as we evaluate the alternatives, and 3. Management planning goals versus a long-range "vision" for the Mall.	a) NPS has a transportation vision plan that was developed before the National Mall Plan was underway, and is being incorporated into the plan. Other circulation issues are addressed within the plan or are analyzed as cumulative impact. b) As noted by the SHPO in our previous meetings, the National Mall has evolved over time and is not the expression of any one plan. Contributing elements are those extant elements that contribute to the historic character. These elements are described in cultural resource inventories prepared for the NPS. Some of these documents are posted on the planning website.

							c) The goals are what the plan is to accomplish – you might relate them to a problem statement. An example - NPS needs to address the impact of high levels of use. A vision statement connects with the park purpose and significance and defines broad desired conditions – which may include a sense of the types of conditions, experiences and facilities desired.
30.	National Coalition to Save Our Mall		1, p5		X	1. Questions and discussion during the tour made evident that changes proposed to the landscape, design, and visitor amenities at Union Square, at the Washington Monument grounds, Lincoln, and Constitution Gardens depend on a mix of considerations which we have not yet had the opportunity to discuss during the Section 106 process. These include potential changes in public use resulting from proposed transportation and circulation options. Without a discussion that integrates transportation alternatives into the Mall plan, it is difficult to assess which options in the matrix might work better than others.	We will address your comment as part of the NEPA analysis
31.	National Coalition to Save Our Mall		2, p1			2. During the stop at Union Square it was evident once again that there is confusion about how the NPS plan relates not only to NPS’s management divisions and individual “cultural landscapes” but also to the historic L’Enfant and McMillan Commission plans for the Mall. This makes it difficult to evaluate the matrix alternatives in terms of what constitutes a “contributing element” and what the “effects” of the different alternatives could be. For example, discussion of the landscape design focused on the parcel as “Union Square” but not on its integral relationship to the National Mall as a whole. This happened at other locations as well. Are these parcels being considered by NPS in isolation or are they contributing elements in the larger National Mall context? We also were confused when Steve Lorenzetti made the point several times that 106 only deals with things actually built—and not the ideas or designs of the historic plans. We were given examples of older plans for the Mall that included the 1939 NCPD proposal and the 1960s Skidmore Owings Plan as examples of the various ideas proposed over the past 100 years. But those plans were developed by individual agencies for their own planning purposes. Are they being given equal weight to the historic L’Enfant and McMillan Plans which are on the National Register?	The National Mall has evolved over time from both of the L’Enfant and McMillan plans but neither of these plans was fully implemented. AS NPS prepared cultural landscape inventories for the Mall, it became clear that Union Square had a history distinct from either of the plans and from the rest of the mall. a separate cultural landscape inventory was prepared for Union Square. Inventories for both the Mall and Union Square are among the cultural landscape or cultural resource materials available online at www.nps.gov/nationalmallplan/History.html . Other information was shared to illustrate how plans evolve. The National Mall is a layering of various plans, some of which were realized to a greater degree than others. The ways in which these plans are layered creates a continuum that reflects the evolution of the National Mall. As each section of the National Mall was evaluated, the existing properties were evaluated for their character-defining features and their eligibility for the National Register, regardless of which plan they originated from. The significance of these resources is articulated in the NR nomination form. According to the ACHP guidelines, the NPS may not distinguish between National Register properties. The NPS must balance its need to address the National Mall as an integrated whole while ensuring compliance with the ACHP’s <i>Regulations for the Protection of Historic and Cultural Properties</i> (36 CFR 800).
33.	National Coalition to Save Our Mall		2, p2			3. During the bus tour it became clearer than ever that the NPS’s major priorities remain management and maintenance issues for grass, trees, pathways, and restrooms. If there is a long-range vision, as NPS states in its planning documents and during Section 106 sessions, it is not clear what that larger context is. So far, discussion during the public consultations and Section 106 meetings have focused primarily on management concerns, and in particular on NPS priorities. On what basis will NPS weight its own priorities against the comments proposed by consulting parties, many of which may conflict or disagree with NPS goals?	The purpose of the bus tour was to look at the trees, paths, structures, etc. that are features that contribute to the cultural landscape. The NPS referred to these elements throughout the tour to assist the participants in their identification of the impacts on historic resources. The National Mall plan will address a variety of needs and issues to fulfill its mission for the future. Issues are based in part on the comments provided by the public and the consulting parties through the NEPA and 106 process. You are correct that management and maintenance of the National Mall are concerns for the NPS - but they are not the only issues that need to be addressed. Management of the National Mall is a balancing act that must consider resource protection, visitor use and

							<p>experience, and the appropriate level of development. Planning is about determining the most appropriate way for the NPS to balance these complimentary or multiple interests. The result will be the preferred alternative. The input of the public and the consulting parties helps to develop a preferred alternative that strikes the best possible balance for the future.</p> <p>Please refer to the "Summary of Roles of NPS, SHPO, ACHP, Consulting Parties" was handed out in the April meeting.</p> <p>NPS described briefly its decision process which typically examines advantages of alternatives in 5 areas, in this case 6:</p> <ul style="list-style-type: none"> ·1 providing safe visits and work experiences; ·2protecting natural and cultural resources ·3providing visitor enjoyment (includes experiences, education, recreation, entertainment and things like convenient and pleasant experiences) ·4operational efficiency ·5other benefits – socio-economic, partnerships, etc 6 demonstrations and events
35.							
36.	Guild of Professional Tour Guides (Guild)	5/10/08	1		X	<p>We believe that the Mall Plan should include an identification of the tour bus parking issue as this is common to all alternatives. The Plan does not address this issue although it acknowledges that for many Mall events participants arrive in tour buses. At the January 9, 2008 meeting one of the Guild representatives identified this issue as an extremely important one but was dismissed with a response that "We are working with the DC Government on this issue." The Guild has seen little or no progress on this issue since the publication of the District of Columbia's "Tour Bus Management Initiative" in January of 2004. We have repeatedly urged the District of Columbia Department of Transportation to implement the little or no cost initiatives without success. It is suggested that NPS management at an appropriate level initiate discussions with the Mayor's Office to seek resolution of the problem and that it also be identified and addressed in the Mall Plan.</p>	Tour bus parking and other transportation-related issues will be addressed as part of the NEPA analysis.
	Guild				X	<p>Recommendation: At last bullet change to read "A one-way loop serving Arlington Cemetery with extensions to the U.S. Marine Corps Memorial, the Air Force Memorial and the Pentagon Memorial with connection to the National Mall service."</p>	Comment noted.
37.	Guild		Supplementary		X	<p>Comment: Para 11. the Guild strongly supports providing a new Metro station in East Potomac Park convenient to the Thomas Jefferson Memorial.</p>	This comment has been submitted as a part of the NEPA process. Susan – is a stop at EPP proposed in any of the alternatives? It is proposed by the Framework Plan – and NPS supports that as a long term vision in all the alternatives.
38.	Guild		"	X	<p>Comment: Para 7.4 Lighting Hierarchy and Guidelines. The Guild has recommended in January 2008, that a lighting plan be developed <u>now</u> without regard to which Alternative is selected. The plan should address improvements that are common to all four alternatives.</p> <p>Comment: Para 13.9 Public Safety. Expediting the development of a Mall lighting plan will be a much needed initial step in upgrading public safety.</p>	A lighting plan would be done in a subsequent level of planning intended to implement the general recommendations in the National Mall Plan.	
39.	Guild		"		X	<p>Comment: Para 13.8 Smithsonian Arts and Industries Building. The Guild strongly supports use of the Arts and Industries building as a Washington, D.C. visitor and welcome center.</p>	This comment will be considered in the NEPA analysis.

40.	Guild		“		X	Comment: Para 14.1, Washington Monument. The Guild strongly supports the extension of Washington Monument hours. Because of the present limited hours we suspect a ticket scalping operation is in existence. This problem has been reported to the NPS Guild liaison officer.	This summer (2008), beginning July 6, the hours have been temporarily extended until 10pm since funds and staffing became available through the Centennial initiative. Your comment supports extending hours permanently.
41.							
42.	Committee of 100 on the Federal City	5/19/08	1	X		Comments are preliminary due to June 11, 2008 discussion of Pennsylvania Avenue	Noted. NPS did not provide any materials for review at the June 11 meeting. As discussed during the June 11 meeting, it may be appropriate to separate Pennsylvania Avenue from the National Mall Plan.
43.	C100		2, p1		X	We have spent considerable time reviewing the “Draft Alternatives Matrix-The National Mall” (April 2008). We have found it useful in thinking about the various choices that need to be made regarding the future development of The National Mall, but we have also found it perplexing. The Matrix focuses on making somewhat detailed choices in a large number of categories (141 major “topics or areas”, often with subchoices within the subcategories.). For each of the 141 topics or areas, the matrix provides four choices (No-Action Alternative, Alternative A-Focus on Historic Landscape and Education, Alternative B-Focus on a Welcoming Civic Space, and Alternative C-Focus on Urban Open Space, Recreation, etc.), though in many instances, two or more of the alternatives are the same. The problem we see with this approach is that the National Mall, and even many subareas, must serve different roles at different times and for different groups. Indeed, different people visiting the National Mall at the same time may very well experience the Mall in different ways, and the Mall must serve a variety of needs at the same time.	The matrix repeats concepts when there are a limited number of viable alternatives.
44.	C100		2, p2	X		There are also a wide variety of needs in addressing the future of the Mall. There are some big issues and big ideas (and big questions) that need and deserve concentrated attention (the redesign of Union Square, the Tidal Basin redesign and connections to adjacent areas, the question of underground parking and a possible 14 th Street tunnel, transportation connections and service with adjacent areas, accommodating tour buses, etc.) There are also many other design and service issues (walkway design, improvement of soils, provision of rest rooms, food service, orientation, etc.) which are also very important but which can be addressed within the overall framework, once that framework is set. The “comprehensive list” arrangement of the Alternatives Matrix may mean that some major issues and questions get lost.	NPS agrees that the there are a great many issues. In providing a preliminary alternatives matrix, consulting parties have a better sense of what issues they may want to focus on, and the level of commitment that will be required.
45.	C100		2, p3	X		Our approach is therefore to undertake further consultation with other consulting parties to see if a consensus can be reached on a least some of the many “topics or areas”. Further consultation with the National Park Service will likely be needed about the meaning of some alternatives.	NPS agrees that additional compliance will be needed for a number of projects; and those projects will be identified.
46.	C100		2, p4		X	It is important that the final National Mall Plan be presented in a clear manner and that the important relationships with adjacent areas be indicated.	Cumulative impacts are addressed in the analysis portions of the draft document of DEIS. Section 106 comment would be useful to identify impacts on adjacent historic resources or the impact of adjacent actions on National Mall historic resources.
47.	C100		2, p5		X	Time Frame: The time frame for this National Mall and the Pennsylvania Avenue National Historic Park Plan is 50 years, presumably 2010-2060, a slightly longer time frame than the period since the last major Mall Plan (1966) and about the time period for the current planning	Noted. NPS agrees that big visions often take a long time to implement. The Mall planting plan derived from the historic McMillan Plan is a good example of something that took decades to complete.

						and rebuilding of Pennsylvania Avenue (beginning in the early 1960s and essentially completed with the Newseum which opened in Spring 2008). It is essential that the big ideas be stressed even though they may not be implemented for many years. Indeed, it is likely that many of the smaller, less dramatic features of the plan will be the first to be completed.	
48.	C100		3, p1		X	Format of Plan: The consulting parties do not yet have an understanding of the structure and format of the final plan. It is important that the plan have an overall clarity so that Washingtonians, and all Americans across our country, can understand the big ideas of the Plan.	The draft plan (DEIS) is expected to be quite large and typically includes: the need for planning, the scope of the plan, relationship to other planning, alternatives, summary of environmental consequences, affected environment, environmental consequences, appendices, preparers, etc. Far in advance of the draft plan, the consulting parties have had access to a more detailed range of alternatives. Consulting parties' historic preservation comments will provide information useful for analyzing effects on historic resources.
49.	C100		3, p2	X		Area of Plan: There has been considerable discussion among the National Park Service and the consulting parties about the area covered in the plan. The current plan is limited in area by National Park Service administrative boundaries. However, it is important that overall concepts and relationships be clear. At the least, plans for adjacent areas (such as the White House Area, also planned by the National Park Service) and the Capitol Complex should be shown in an illustrative manner. Links to adjacent areas, and the plans for those areas (East Potomac Park and links to Old Naval Observatory Hill and the Kennedy Center) also will be important for the use of the National Mall and the impact of those linkages needs to be clearer and more complete than indicated thus far.	Adjacent areas are typically part of NEPA cumulative impacts – not the alternatives matrix or within an illustration. In this case the relationship to other plans will address coordination with other vision plans underway. See “Planning together for Central Washington, DC” For how four vision plans are being coordinated.
50.	C100		3, p3		X	Plan Parameters: It would be useful to have some additional information available on the forces that will shape the use of the National Mall and related areas in the future, such as projections of visitation and traffic.	This information typically is included in a draft plan to the extent it is available.
51.	C100		3, p4		X	Role of Other Planning Programs: The Plan for the National Mall and the Pennsylvania Avenue Historic Park are part of the overall “Planning Together for Central Washington “ program being carried out by federal and District agencies. Related planning efforts are underway with draft plans to be released in the next several months (the National Capital Framework Plan, being prepared by the National Capital Planning Commission and the Commission of Fine Arts, and the Capitol Complex Master Plan being prepared by the Architect of the Capitol). The Center City Action Agenda, prepared by the D.C. Office of Planning with other District agencies and private organizations, was released in early March 2008. The National Park Service has been involved in these planning programs. However, the consulting parties have generally not seen the draft proposals that are still being developed. It is difficult to comment fully on the National Mall Plan when plans for adjacent areas are not yet clear.	These are typically covered in cumulative impacts in NEPA.
52.	C100		3, p5	X		In addition, the Smithsonian Institution is a key player in the activities and overall character of the National Mall and adjacent areas. Yet, except for the future site of the Museum of African American History and Culture, information on future plans of the Smithsonian are not available. There needs to be more discussion of Smithsonian plans, including the potential future use of the Arts and Industries Building.	The NPS policy supports adaptive reuse of historic buildings. The Arts and Industries building is owned and operated by the Smithsonian. The Smithsonian Institution is a cooperating agency in the National Mall Plan. Other Smithsonian projects would be addressed in cumulative impacts.
53.	C100		3, p6		X	Flooding Issue: The potential for serious flooding of some National Mall areas has been raised, a problem that could well become more serious if sea level changes related to global warming become more pronounced over the next 50-100 years. The implications of these potential changes needs to be considered and made clearer.	These NEPA topics get addressed in the draft plan in natural resources sections.

54.	C100		4, p1		X	One of the most important features of The National Mall in the 21 st Century will be its increased centrality with other areas of Central Washington, a condition stressed in the Center City Action Agenda. Transportation and symbolic links with these areas will be a key factor in how the National Mall operates and is perceived in the future.	Your comment has been noted.
55.	C100		4, p2-3		X	<p>The “Potomac Riverfront” section of the National Mall is especially important and has not received sufficient attention in discussions and in the Matrix (No. 28. West Potomac Park Riverfront). One of the important concepts in the NCPC Legacy Plan (1997) was the Washington Waterfront Walk (WWW), the proposal to connect various walkways to form an 11-mile waterfront walk extending from the Georgetown waterfront on the west to the National Arboretum on the east. Much of this distance involves existing federal land, much of it under the jurisdiction of the National Park Service. To the west, in Georgetown, this walk will connect to the C&O Canal towpath and the Capital Crescent Trail. To the east it will connect with trails east across the Anacostia River and along the Anacostia River to the north.</p> <p>The section of the Washington Waterfront Walk in the National Mall area is especially important since it will receive heavy use by visitors as well as residents. Design of the WWW will be important because of its use by walkers, joggers and bicyclists. Multiple pathways may be necessary in some areas. Providing an easy and safe connection from the Tidal Basin area to the Southwest Waterfront will be especially important. Separate walking and biking trails are mentioned in the Matrix but the importance of this link in the overall Washington Waterfront Walk needs to be made clear.</p>	Your comment has been noted.
56.	C100		4, p4	X		The planning documents and the Matrix suggest some “big ideas”, such as redesigning Union Square, redesigning the north side of the Tidal Basin, and improving the links between the Washington Monument Grounds and the Tidal Basin. However, the nature of these proposals are not completely clear and they need to be more clearly explained in functional and design terms.	We hope to better explain the logic for proposals in analysis.
57.	C100		4, p5	X		One of the big issues in the central part of The National Mall (between the Capitol and the Washington Monument) is how to have large special events without impairing the soil and tree conditions of the Mall. The Smithsonian’s Folklife Festival is a key example. Section 13.4 of the Matrix hints at this problem. Further discussion of this key issue is necessary.	NPS recognizes that the tree and grass panels are integral components of the Mall’s cultural landscape. The plan will analyze these impacts and describe best management practices intended to lessen the impacts of events on these resources.
58.	C100		5, p1	X		One of the key issues involving the National Mall is the “view to the west” from the Capitol to beyond the Lincoln Memorial. The original design for the National Mall envisioned an uncluttered view to the west, symbolizing the future growth of the country. Unfortunately, a number of somewhat banal buildings in Virginia are visible beyond the Lincoln Memorial and mar the view west from the Capitol along the Mall. Past efforts by the federal government (NCPC) to protect this viewshed have not been fully successful. Continued protection of the western view should be part of the National Mall Plan. Hopefully at some future time it will be possible to remove some of the offensive buildings (as they wear out) and restore a more appropriate background for the National Mall. This is a matter which may be more in the purview of the National Capital Planning Commission. However, no plan for the future of The National Mall should ignore this threat to the historic character of this special place.	NPS recognizes the view to the west as a critical historic resource. The National Mall Plan will address past actions in Virginia as a cumulative impact on this historic view.
59.							

60.	ASLA American Society of Landscape Architects	5/19/08		X	X	ASLA made and submitted handwritten notes on the matrix. Comments more closely related to section 106 are listed	Although not specific to the Section 106 process, the NPS will consider all comments submitted. Many will be addressed in the EIS impact analysis section.
61.	ASLA		P2	X		Consider the Tidal Basin as a complete landscape, complete a study	Noted – the East and West Potomac Parks Historic District revised National Register nomination, and the Thomas Jefferson Memorial Landscape Overview do address these areas.
62.	ASLA		P 4	X	X	Temporary fence system and education	Noted – NPS recognizes the need to develop more appropriate systems for temporary enclosures.
63.	ASLA		P13	X		Careful siting of architecture and mix of character	NPS concurs and Management Policies provide guidance.
64.	ASLA		P22	X		Framework plan recommendations will need to be carefully coordinated because would have a dramatic impact of historic views and vistas	Noted. NPS is a partner agency working on the Framework Plan and has provided comment on important north south views from the National Mall.
65.							
66.	DC HPO DC Historic Preservation Office	5/19/08	1, p3	X		Before providing specific comments, we point out several important principles that should be kept in mind when developing the preferred alternative. For example, implementation of any one proposal may not cause a drastic change to the National Mall’s environs but carrying out a number of them could significantly alter the characteristics that qualify the subject historic properties for listing in the National Register of Historic Places. In other words, the cumulative of these alternatives must be considered. Doing so will not only increase the chances to identify and avoid adverse effects, but will also provide critical opportunities to examine how the various approaches should relate to each other in terms of circulation patterns, consistency of design and related matters.	NPS concurs. Thinking through the complex major and minor issues comprehensively is especially important.
67.	DC HPO		1, p4	X		Although the National Mall has been described as a “completed work of civic art,” we also believe that it is important to acknowledge that the National Mall has, and will always continue to change and evolve. Basing current decisions about future actions upon historical precedents such as the L’Enfant Plan and the McMillan Plan is of the utmost importance. Yet it must be simultaneously recognized that the National Mall which exists today is not the embodiment of any single plan, but rather a combination of all of the significant historical planning efforts, most of which were only partially implemented.	NPS concurs and had previously summarized the proposals and what got built of historic plans in <u>A History of the National Mall and Pennsylvania Avenue National Historic Park.</u>
68.	DC HPO		2, p1	X		The heterogeneous origins of the National Mall are implicitly acknowledged in the present-day efforts to establish a unifying name for the area—the National Mall—or vice versa, to define the agreed-upon area described by that commonly used term. The “National Mall” for the purposes of this project is not in fact a single designed entity, but rather a collection of separate landscapes designed at different times according to sometimes radically different design philosophies. It is in these respects wholly unlike New York’s Central Park or San Francisco’s Golden Gate Park, both of which are distinguished both by their fully executed comprehensive design plans and their clear identity in name and extent. Additionally, the National Mall has over time become more fragmented by a grid of increasingly busy city streets and ill-conceived highway intrusions.	NPS concurs and this is one reason it has carefully been using the terms Mall and National Mall. National Mall is the unifying name for the entire area.

69.	DC HPO		2, p2	X		<p>This lack of clarity about what constitutes the “National Mall” is an issue of more than semantics. It reflects some of what is lacking about the present condition and image of the National Mall, and suggests some of the physical and functional attributes the National Mall Plan should focus on in attempting to establish a more integrated landscape and a richer visitor experience. There are several key areas in which we believe the National Mall Plan should provide specific guidance for the future:</p> <ul style="list-style-type: none"> • Establishing a comprehensive design approach for key areas in need of improvement. Some of these are areas that have never been fully landscaped, whose historic design has been disrupted by later alterations, or that could provide better transitions between landscapes of different design character (e.g., Union Square, Ash Woods, the Constitution Avenue terminus at the Belvedere, the Sylvan Theater/South Grounds area, the levee area, and the base of the Lincoln Memorial steps); • Serving as a framework to consider nearby projects in coordination, rather than as separate isolated improvements; • Improving and strengthening the coherence of the pedestrian circulation system as it is adjusted to accommodate new facilities and needs; and • Balancing the monumental and naturalistic features of the National Mall, particularly as a means of accommodating more visitor amenities in addition to civic grandeur. 	<p>NPS agrees with the need to integrated landscape and visitor experience. Suggestions noted for specific areas.</p> <ol style="list-style-type: none"> A comprehensive vision or desired program for areas will be described, rather than a design. It is expected that design and further consultation will be required for these areas. The goal of the plan will be to coordinate the visions and programs of areas. NPS will continue to work with others such as Framework Plan to coordinate projects. NPS and other plans agree that the pedestrian circulation system and environment may need to be adjusted and strengthened. NPS can further describe the features and character of areas during analysis.
70.	DC HPO		2, p3	X		<p>Given the volume and complexity of the suggested approaches, this letter does not address every topic covered in the Alternatives Matrix or categorize every alternative into a “recommended” or “not recommended” category.</p>	<p>Noted. Consultations will continue.</p>
71.	DC HPO		2, Sect 7.1	X		<p><u>RECOMMENDED</u> Section 7.1 – Visitors Facilities/Architectural Character: This is an area where it may be appropriate to combine aspects of all three proposed alternatives. Alternative A recommends developing new visitor service facilities to be “compatible with timeless visitor facilities (e.g. the Mall and Lincoln refreshment stands), making them more identifiable for visitors, strengthening the NPS identity, and denoting that they are secondary to memorials.” This appears to be appropriate because it could mitigate the adverse visual effects caused by an excess of architectural styles. Yet, it may also be suitable to develop “a limited number of architecturally significant destination visitor facilities in certain locations” (e.g., Constitution Gardens, Tidal Basin) as recommended in Alternative B and to incorporate “cutting-edge sustainable design solutions” into the visitors facilities Alternative C recommends.</p>	<p>Noted. Thanks for noting a sense of architectural hierarchy that may be important in preserving the historic landscape.</p>
72.	DC HPO		3 – 7.4	X		<p><u>RECOMMENDED</u> Section 7.4 – Visitor Facilities/Lighting Hierarchy and Guidelines: Developing and implementing comprehensive lighting guidelines for the monumental core as recommended by all three alternatives could enhance the National Mall’s nocturnal “sense of place” and possibly decrease some concentrated use during daylight hours by encouraging nighttime visitation.</p>	<p>Thanks for noting the difference in nocturnal sense of plan.</p>
73.	DC HPO		3 – 13.3	X		<p><u>RECOMMENDED</u> Section 13.3 – The Mall/Natural Resources/Other Trees: While the elm tree panels are a primary feature of the McMillan plan for the Mall, the few “non-contributing” specimen trees at the Smithsonian Grounds and Union Square should probably be recognized as historic landscape features in their own right. Retention of these trees could help to balance the rigid formality of the Mall and recollect the former naturalistic landscape that is part of the Mall’s historic evolution.</p>	<p>NPS would like to consult with DC SHPO in more detail on this comment.</p>
74.	DC HPO		3 – 14.2	X		<p><u>RECOMMENDED</u> Section 14.2 – Washington Monument/Security Checkpoint: All three alternatives recommend replacing the temporary security checkpoint on the east side of the monument. We concur and recommend that this be carried out as soon as possible in order to eliminate the existing adverse visual effect. If it becomes necessary to construct a new pavilion as a security checkpoint, it may be appropriate to consider working with the Smithsonian to relocate the historically related Horatio Greenough statue of Washington into such a pavilion.</p>	<p>Noted recommendation for quick action. PMIS statements have been prepared. Recommendation about the Greenough statue of Washington is a totally new idea that had not been received during comments – can be considered during the design process for the security checkpoint.</p>
75.	DC HPO DC HPO		3 - 15.5	X		<p><u>RECOMMENDED</u></p>	<p>Noted. The building is not large, and it currently provides staffed information, restrooms and offices for rangers. Improved pedestrian access to south grounds is a need from this area as well as 15th and Independence.</p>

					Section 15.5 – Washington Monument Grounds/Visitors Facilities: Based upon the success of the recently renovated Monument Lodge, it seems appropriate to rehabilitate the Survey Lodge in order to improve the existing visitors facilities and maximize the use of historic buildings. Perhaps, the rehabilitation efforts could be expanded beyond making the historic building accessible for persons with disabilities as suggested in Alternative B. Improved pedestrian access might also be provided in conjunction with other plans for the Monument’s south grounds.	
76.	DC HPO		3 – 17.1	X	<u>RECOMMENDED</u> Section 17.1 – Constitution Gardens/Vision Emphasis: This is one of the most underutilized areas of the National Mall. Developing a “garden restaurant” as proposed in Alternatives B and C and adding “recreation rentals” (e.g. model boats) as discussed in Alternative C could attract more people to relieve congestion in other areas of the National Mall. In turn, this could provide more opportunities for education of the public at some of the Mall’s lesser-known resources (i.e. the Lockkeeper’s House and the Declaration of Independence Signers Memorials).	Comment noted – relieving congestion can help preserve historic resources and emphasize lesser known resources.
77.	DC HPO		3- 22.6	X	<u>RECOMMENDED</u> Section 22.6 – Lincoln Memorial Grounds/Memorial Circle and Radius Roads/Perimeter Security: We recommend redesigning the area at the base of the Lincoln Memorial steps to accommodate security, use as a performance area and improved circulation patterns.	Including and continuing multiple uses during completion of security remains a goal. Separate section 106 consultation will continue.
78.	DC HPO		3- 23.1 and 23.4	X	<u>RECOMMENDED</u> Sections 23.1 & 23.4 – Lincoln Memorial Grounds/Watergate Area/Historic Landscape Features and Public Access and Parking: The removal of Constitution Avenue from 23 rd Street to the Potomac Belvedere is probably the most disruptive and unfortunate of the highway-related alterations to the National Mall, severing this monumental boulevard from its intended terminus at the river. The SHPO strongly recommends that the Mall Plan call for restoration of this segment of the Avenue.	Thank you for this clearly articulated suggestion for a positive change on the historic character of the northwest area of the National Mall.
79.	DC HPO		3- 25.1	X	<u>RECOMMENDED</u> Section 25.1 – DC War Memorial/Ash Woods: We recommend that the <i>Historic Structures Report</i> be implemented so that this memorial can serve both its functional and commemorative uses. Any significant alterations to the memorial’s surroundings should be closely coordinated with our office.	NPS concurs, and has had a PMIS statement/cost estimate for this project.
80.	DC HPO		3 – 25.6	X	<u>RECOMMENDED</u> Section 25.6 – DC War Memorial/Ash Woods/Operations – United States Park Police Stables: As described in the “existing conditions” section of the Matrix, these facilities are “not in keeping with the historic character of the National Mall.” We recommend that Alternative C be implemented so that the stables are reconstructed in keeping with the historic character of the Mall.	The importance to being in keeping with the historic character is noted.
81.	DC HPO		3 – 26.7	X	<u>RECOMMENDED</u> Section 26.7 – Tidal Basin Area/Visitors Facilities: It appears appropriate to redesign the existing refreshment facility to accommodate the need for a new visitors facility that would blend in with the historic character of the National Mall.	The importance to being in keeping with the historic character is noted.
82.	DC HPO		4, p1	X	<u>RECOMMENDED</u> Various Sections/General Recommendations: We acknowledge that more restroom and food facilities are necessary. We maintain that they can be successfully incorporated onto the National Mall through careful planning and design. The “Circular Restrooms” should be replaced with new restrooms that blend in with the historic character of the National Mall; the “Mall Bench” and mall lighting standards should be utilized to the maximum extent feasible and appropriate.	The importance to being in keeping with the historic character is noted. NPS notes that you recommend using the Mall bench and lighting fixtures to the maximum extent feasible and appropriate.
83.	DC HPO			X	<u>NOT RECOMMENDED</u> Section 13.2 – The Mall/Historic Landscape: Alternative B recommends adding a “decorative water play feature at the 8 th Street cross axis” because the McMillan Plan proposed such a feature. As previously mentioned, the National Mall is not the embodiment of the McMillan Plan or at the McMillan Plan’s concepts evolved during implementation, the idea of adding a feature on axis was discarded on more than one occasion.	Noted that the Mall is not the embodiment of any one plan, and that you do not consider a water feature at the 8 th street axis appropriate.
84.	DC HPO			X	<u>NOT RECOMMENDED:</u>	Your reasons (sound, visual, traffic conditions) for not recommending an underground parking garage, shown in alt B are noted.

					Section 13.6 – The Mall/Public Access and Parking: Alternative B recommends constructing an underground visitor parking facility between 15 th and 12 th Streets.” In addition to the numerous adverse effects that would result from constructing such a significant facility, the provision of a substantial number of additional parking spaces directly under the Mall would exacerbate the audible and visual adverse effects that are caused by the already overwhelming traffic conditions. It could also discourage the pursuit of alternative approaches for Mall access such as public transportation.	
85.	DC HPO			X	<u>NOT RECOMMENDED:</u> Section 15.4 – Washington Monument Grounds/Public Access and Parking: Alternative B proposes an underground visitor parking facility. This facility would cause adverse effects similar to those specified in Section 13.6 above – The Mall/Public Access and Parking.	Your reasons (sound, visual, traffic conditions) for not recommending an underground parking garage, shown in alt B are noted.
86.	DC HPO			X	<u>NOT RECOMMENDED:</u> Section 15.5 – Washington Monument Grounds/Visitors Facilities/Food & Gifts: If it is essential for a food and gift facility to be located on the Washington Monument Grounds, we recommend that it not be located on a permanent, partially underground, grass-roofed facility between 14 th and 15 th Streets as suggested in Alternative A because doing so would also likely constitute a permanent adverse visual effect on the Washington Monument and the surrounding historic properties.	Comment noted – adverse historic effect of Alt A location on the Washington Monument and historic properties.
87.	DC HPO			X	<u>NOT RECOMMENDED:</u> Section 26.3 – Tidal Basin Area/National Resources/Tidal Basin Function and Walls: We recommend against the portion of Alternative C that suggests eliminating the bay north of Kutz Bridge to provide additional recreation space. The north bay of the basin is an important design feature and part of the backdrop for the monument to naval hero John Paul Jones at the terminus of 17 th Street.	Noted you consider the north bay as a historic design feature, backdrop and terminus.
88.	DC HPO		4	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 6.3 – Getting Around/Public Access & Wayfinding: The proposal to “tunnel some roads to improve vehicular circulation” as recommended in Alternative C would require significant consultation.	An idea like tunnels or garages would result additional compliance and consultation beyond the National Mall Plan.
89.	DC HPO		4	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 7.3 – Visitors Facilities/Paving: Several different approaches are identified to address the issue of paving. Alternative B proposes that “paving should simulate the appearance of gravel.” This may be suitable in many cases but the “coordinated paving plan” that is recommended in Alternatives B and C would probably have to be developed in order to make informed decisions about this and other paving-related issues such as curbs etc. Additional analysis and through further consultation are recommended.	Further consultation would occur with a coordinated paving plan.
90.	DC HPO		4	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 12 – Union Square: This section arguably represents the most significant changes proposed for the National Mall including redesign or removal of the reflecting pool, redesign of the entire square and possibly providing for a multipurpose visitors center along important view sheds such as Pennsylvania Avenue. Although the reflecting pool has not been formally evaluated for the National Register, it is likely eligible. A determination of eligibility would not necessarily imply that we would argue for preservation of the current feature but we do advocate that some sort of additional historical landscape research be conducted to identify as many of the historical designs that have existed on this site to date – including the work completed in the 1930s. Such research may determine that the approach described in Alternative C – “redesigning the reflecting pool as a shallow pool that could be drained for demonstrations and events or frozen for ice skating” – is appropriate. On the other hand, the McMillan Plan, the Frederick Law Olmstead Jr. design and other historical precedents could be used to argue against including a water feature at all. The same precedents could be used to advocate a variety of approaches for redesign of the entire square. The possible inclusion of a multipurpose visitors center that could impede important views may complicate matters even further. Given the complexity of the issues involved in Union Square, we strongly recommend that no approach be excluded from further consideration and that no single approach be endorsed for this particular aspect of the National Mall Plan. Instead, more detailed alternatives should be developed and further consultation should be conducted in order to fully define the preferred alternative.	It is a goal of the plan to identify a vision for use of Union Square. NPS has prepared a Union Square Cultural Landscape Inventory which does explore the history of planning and design for the area. Your comments are important in helping the NPS determine appropriate direction for the rehabilitation of Union Square. Consultation with your office would continue during a design process.
91.	DC HPO		5	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u>	Noted that a 14 th street tunnel (Alt C) would constitute a permanent adverse impact and change to historic access patterns.

					Section 13.6 – The Mall/Public Access and Parking: Alternative C recommends constructing a 14 th Street vehicular tunnel to improve pedestrian movement and safety. This proposal, which is identified as one alternative in the <i>14th Street Bridge Corridor Study</i> may be appropriate but it would constitute an adverse effect that would have to be minimized and mitigated. The degree to which 14 th Street currently does or could serve as a “monumental approach” to the National Mall would have to be considered.	
92.	DC HPO		5	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 15.4 – Washington Monument Grounds/Public Access and Parking: Alternative B contemplates constructing pedestrian underpasses or bridges between 14 th and 15 th Streets near Jefferson and Madison Drives. The pedestrian underpasses and/or bridges have the potential to constitute permanent adverse visual effects on the Washington Monument and the surrounding historic properties if not carefully planned and designed. Further consultation is recommended.	Noted that tunnels would constitute a permanent adverse impact and change to historic access patterns. Further consultation would be necessary.
93.	DC HPO		5	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 15.5 – Washington Monument Grounds/Visitors Facilities/Food & Gifts: Alternative B recommends a new multipurpose facility on the site of the Sylvan Theater while Alternative C recommends the same facility be located north of Independence Avenue between 14 th and 15 th Streets. Both of these sites are potentially suitable for a new facility but a number of design issues (e.g. possible reorientation of the Sylvan Theater; consideration of existing on-site trees, visual effects on the Washington Monument etc.) would have to be examined and further consultation carried out before one site is selected over another.	NPS agrees that further consultation about design would be necessary
94.	DC HPO		5	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 15.6 – Washington Monument Grounds/Operations-Heliport: Reconfiguring the walkways and paving a grassy area to provide for a heliport that is only used “for emergencies and occasionally for state arrivals” would appear to constitute an unnecessary adverse effect. However, it may be possible to design a feature that serves additional functions (e.g. staging area, seating etc.) and blends in with the historic character of the National Mall. Additional planning and consultation would be required to determine if such a multi-purpose function could be appropriately designed on the Washington Monument Grounds.	Agree that additional planning and consultation would be necessary, and note your preference to address multiple functions.
95.	DC HPO		5	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 17.2 – Constitution Gardens/Lockkeeper’s House: Alternatives A proposes reuse of the Lockkeeper’s House as a visitor information station while Alternatives B & C suggest relocating the building in order to eliminate “safety hazards for turning vehicles.” We believe that the Lockkeeper’s House is underutilized and we are concerned about the potential for damage given the building’s proximity to Constitution Avenue. Although a decision regarding whether or not the Lockkeeper’s House should be relocated will require the development and evaluation of various design alternatives, we have already suggested our conceptual support for the proposal to relocate the Lockkeeper’s House. We recommend that it should not be planned in isolation, however, but rather as an element of a coordinated plan for the levee, restaurant, and other features of this area of Constitution Gardens	Note your conceptual support for relocation of the Lock Keeper’s House and that it be part of the coordinated plan for levee, food service and other features. Further consultation would occur.
96.	DC HPO		5	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 21.2 – Lincoln Memorial Grounds/Reflecting Pool: Several significant changes are also being considered for this end of the National Mall. Nearly every one of the approaches identified in all three alternatives (e.g. reconstructing the reflecting pool, establishing a seat wall, constructing a 16’ wide paved walk and 3’ wide jogging surface etc.) would constitute an adverse effect on the historically significant property and yet some of these actions may ultimately improve the functionality of the resource. As in the case of Union Square, we recommend that more detailed alternatives be developed and that further consultation be conducted in order to fully define the preferred alternative	Further consultation would continue
97.	DC HPO		5	X	<u>SUBSTANTIAL ACTIONS REQUIRING FURTHER CONSULTATION:</u> Section 26.3 – Tidal Basin Area/National Resources/Tidal Basin Function and Walls: The deteriorating conditions of the Tidal Basin clearly establish a need for some type of intervention but the recommended engineering studies must be completed before decisions can be made about appropriate design changes.	NPS concurs.