

**DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
COMPREHENSIVE DESIGN PLAN FOR THE WHITE HOUSE AND
PRESIDENT'S PARK**

Comments to the National Park Service

March 4, 1999

Abstract

The National Park Service (NPS), after working for six years in concert with the Commission and ten other cooperating agencies and federally chartered organizations, has released for public comment the draft Environmental Impact Statement (draft EIS) for the Comprehensive Design Plan for the White House and President's Park. The draft environmental document describes and analyzes NPS's Preferred Alternative, which is the Proposed Plan, as well as four alternatives. The document does not include information or proposals for Pennsylvania Avenue and related issues for Lafayette Park, which will be the subject of a future study. NPS will complete its environmental review and prepare a draft master plan (Comprehensive Design Plan) for final action by the Commission. The DEIS describes 28 action items of the Plan, ranging from the treatment of the White House and its collections and grounds, to accommodations for the media, to new visitor services, to traffic and parking accommodations, to the official functions of the Office of the President. Having studied the many options for use and preservation of the historic structures and landscape resources within President's Park, NPS has sought a balance among varying resources and interests. Its goal is to improve the efficient functioning of the Office of the President, to preserve and enhance the symbolic and historic character of the site, and to improve the experience of the American public and all visitors who come to the house and grounds.

Authority

The National Environmental Policy Act and the Commission's Environmental Policies and Procedures.

Commission Action

The Commission authorizes the transmittal of the attached letter to the National Park Service.

* * *

BACKGROUND AND STAFF EVALUATION

DESCRIPTION OF PROPOSAL

NPS, in cooperation with ten other agencies including the Commission, has studied the functional needs and symbolic purposes of the White House and President's Park in order to bring the facility up to date and to enhance the efficiency and appearance of the precinct for the coming decades. NPS has drafted a master plan that appears in the draft EIS as the Preferred Alternative. NPS intends to submit the draft Plan to the Commission once it has completed its environmental analysis under NEPA provisions. Five alternatives, including a No Build Alternative and three other alternatives, were studied in the draft EIS in the development of the Preferred Alternative or Proposed Plan. Twenty-eight action items, evaluated across the five alternatives in the draft EIS, are summarized in a matrix as Table 1 on pages 102-111 of the draft document. The impacts are summarized in Table 2 on pages 112-125. The major categories of analysis and impacts include:

- Comprehensive Design;
- Resource Conservation and Management—Collection Management, Memorials, Archaeological Resources, Plant Materials and Soils;
- Home and Office of the President—First Family Recreation Space, Storage Space, grounds Maintenance, Visitor Arrivals, Meeting/Conference Space, Staff Access/Parking/Circulation, Deliveries, Utilities and Building Systems, News Media Facilities;
- Visitor Use and Services—Information/Orientation, Visitor Center/Museum, Interpretation/Education, White House Tours, President's Park Site Amenities, Public Recreation;
- Special Events—In President's Park (no change to First Amendment demonstrations), On the White House Grounds;
- Transportation—Access and Circulation, Public Parking, Public Transit, Tour Buses;
- Site Management and Operations—President's Park Maintenance, the Steamline;
- Future Studies and Plans.

SUMMARY OF ALTERNATIVES

The document assesses the impacts of the five alternatives on cultural and environmental resources. The following is the staff's summary of the primary physical elements of the alternatives. Many additional functional elements and interior changes are not summarized here.

- *Preferred Alternative (NPS's Proposed Plan)*
 - E Street long-term vision is two lanes eastbound with a third access lane for official vehicles entering the precinct; as an interim solution, E Street is four lanes (two eastbound, two westbound) until a comprehensive analysis of downtown traffic can be undertaken and implemented;
 - Ellipse parking facility for 850 employee cars is underground with entrance portals/ramps from Constitution Avenue; short-term solution prior to construction is to lease garage parking spaces to remove employee cars from surface of precinct;
 - Visitor Center is expanded underground at Baldrige Hall (Commerce Building), with underground passageway to Lily Triangle (from there, visitors walk at grade to E. Executive Park visitor entrance);
 - Northside parking has portal/ramp at W. Executive Avenue with parking facility under Pennsylvania Avenue.

- *No Action (continuation of present management policies)*
 - E Street is two lanes eastbound with official vehicle access lane marked in part by temporary barriers;
 - Parking is at grade on-site and in surrounding parking garages;
 - Visitor Center is in Baldrige Hall and at existing visitor pavilion on Ellipse; visitors cross nearby streets to visitor entrance at E. Executive Park;
 - Deliveries and vehicle access continue where most convenient throughout precinct.

- *Alternative 1*
 - E Street has most intensive use among the alternatives--two lanes eastbound and two lanes westbound;
 - Ellipse parking facility for 850 cars is underground with parking portals and ramps from Constitution Avenue;
 - Visitor Center is constructed under and entered from Ellipse; underground passage continues to visitor entrance on E. Executive Park;
 - Eastside parking/delivery is underground, with portal/ramp on Hamilton Place;
 - Northside parking is under Pennsylvania Avenue, with portal/ramp on W. Executive Avenue.

- *Alternative 2*
 - E Street is tunneled, with portals to east and west of precinct and with at-grade road within precinct closed to general traffic;
 - No Ellipse underground parking facility; employee parking is primarily off-site;
 - Visitor Center is constructed underground to the south of the U.S. Treasury Building’
 - Westside parking/delivery is underground and has portal/ramp on State Place;

- *Alternative 3*
 - E Street is removed and redesigned for access by official vehicles only; precinct designed with emphasis on pedestrian walkways;
 - No Ellipse parking facility; employee parking is primarily off-site;
 - Visitor’s Center remains at Baldrige Hall, with underground passageway to entrance on E. Executive Park;
 - OTS and Northside parking/delivery is under Pennsylvania Avenue with portal on W. Executive Avenue;

ANALYSIS OF IMPACTS

The impacts of the Preferred Alternative and the other four alternatives fall into several broad categories, both positive and negative. In the staff’s opinion, NPS has generally analyzed these fully or adequately except where noted below.

- Positive Impacts of Preferred Alternative include:
 - *Visual*, resulting from the removal of most traffic within precinct and parked cars within and immediately adjacent to the precinct;
 - *Visual*, resulting from the reassertion of the historic park-like qualities of the precinct that will enhance the visit for pedestrians and all visitors;
 - *Physical*, relating to the preservation of fragile historic fabric of the White House and grounds resulting from the removal of certain functions to below-grade facilities and from the improvement in delivery and storage of items;

- Negative Impacts of the Preferred Alternative include:
 - *Visual/physical*, resulting from the loss of 24 trees during underground construction on the Ellipse and the potential loss of up to an additional 31 trees that would be at risk;
 - *Visual/physical*, resulting from the change in the appearance of the Ellipse as it relates to the proposed portals to the underground Ellipse parking garage;

- *Economic*, resulting in loss of parking meter revenue and vendor tax income immediately adjacent to precinct, and potential loss to adjacent businesses from reduction in number of street parking spaces;
- *Traffic- and parking-related*, resulting in 850 cars entering Ellipse parking portals from Constitution Avenue; and from possible changes to E Street traffic depending on outcome of comprehensive downtown traffic study and implementation of solutions.

The staff notes that the document needs additional clarification or study in the discussion of certain direct or indirect impacts:

- Vehicle volumes and parking space conditions related in the report appear not to consider the existence of the future New Washington Convention Center, which will have large events occurring at various time periods throughout a typical year. The inclusion of Convention Center data should be clearly noted.
- The assumption of the availability of existing parking at various parking garages downtown is not substantiated. A vacancy ratio or other verification of available space should be provided. This aspect is significant because of new future projects (see above) which will be placing a substantial parking demand on the downtown parking space supply. Further explanation of the displacement effect of the leasing of federal parking should be evaluated in the context of substantiated data.
- The assumption of replacement parking for all staff levels appears to be incomplete. The staff believes an opportunity exists in the phased development of this project to reduce, to the absolute necessary, employee parking spaces associated with the White House plan. Transportation management objectives should be identified and proposed in the final EIS.
- The discussion of impacts on public parking appears to mix the discussion of the eliminated parking spaces for the public and vendors on evenings and weekends with the number of newly constructed underground parking spaces for employees. While the Commission endorses public transit for employees, it sees the availability of some street parking on the blocks near the White House during non-work hours to be desirable. At present, it does not appear likely that the public will be able to use the underground Ellipse parking garage during non-work hours. This discussion should be clarified to the extent possible.
- The draft EIS evaluation is incomplete pertaining to potential non-point pollution of surface waters. EPA Region 3 has related to the Commission that a significant amount of non-point pollution occurs at parking structures from parked vehicles over time. EPA Region 3 is significantly sensitive to the additional non-point surface water impacts that *federal projects* in the District of Columbia are placing on the

combined sewer system. The staff believes the opportunity exists in the proposed plan to better control water quality impacts of non-point pollution; these should be discussed.

- The draft EIS doesn't include visual analysis of the impacts of the preferred alternative and other alternatives on the White House viewsheds in this section of the city as a whole. Visual impacts are going to be significantly different at various points in the project development. Removal of vegetation is particularly troublesome at the Ellipse and West Executive Avenue. Commission staff recommends visual simulations of all potentially impacted areas in the final EIS.

PREVIOUS COMMISSION ACTION/CONSULTATION WITH NPS

The Commission commented formally on the draft EIS and draft Plan in 1997. The Commission has toured the facility and has been briefed by NPS staff on planning developments. As a cooperating agency, NCPC has been afforded the opportunity to comment informally throughout the six-year study. The Executive Director, as a member of the Executive Committee established by NPS, has contributed ideas and suggestions throughout the study.

COMMISSION OF FINE ARTS

At its meeting on February 18, 1999, the Commission of Fine Arts, also a cooperating agency, approved NPS's Proposed Comprehensive Design Plan (the Preferred Alternative in the draft EIS).

CONFORMANCE

Comprehensive Plan

The White House and President's Park are designated a Special Place in the Preservation and Historic Features element of the Comprehensive Plan. The White House and adjacent federal buildings are National Historic Landmarks. Pennsylvania Avenue and Seventeenth Street are Special Streets and the White House grounds, including the Ellipse, comprise a historic landscape.

The planned underground addition to the existing Visitor Center in the adjacent Commerce Building (Baldrige Hall) is generally supported by policies in the Visitors to the National Capital element, which calls for improved visitor facilities and signage to accommodate visitors to the Nation's Capital.

In addition, the following policies apply:

- The distinguishing original quality or character of historic properties should be protected.

- New construction of historic landmarks should be compatible with the historical architectural character.
- Street space and buildings fronting on Special Streets and Places should be maintained, protected, and enhanced.
- Archaeological resources should be retained intact, where feasible. The area of destruction should be minimized and finding should be documented.

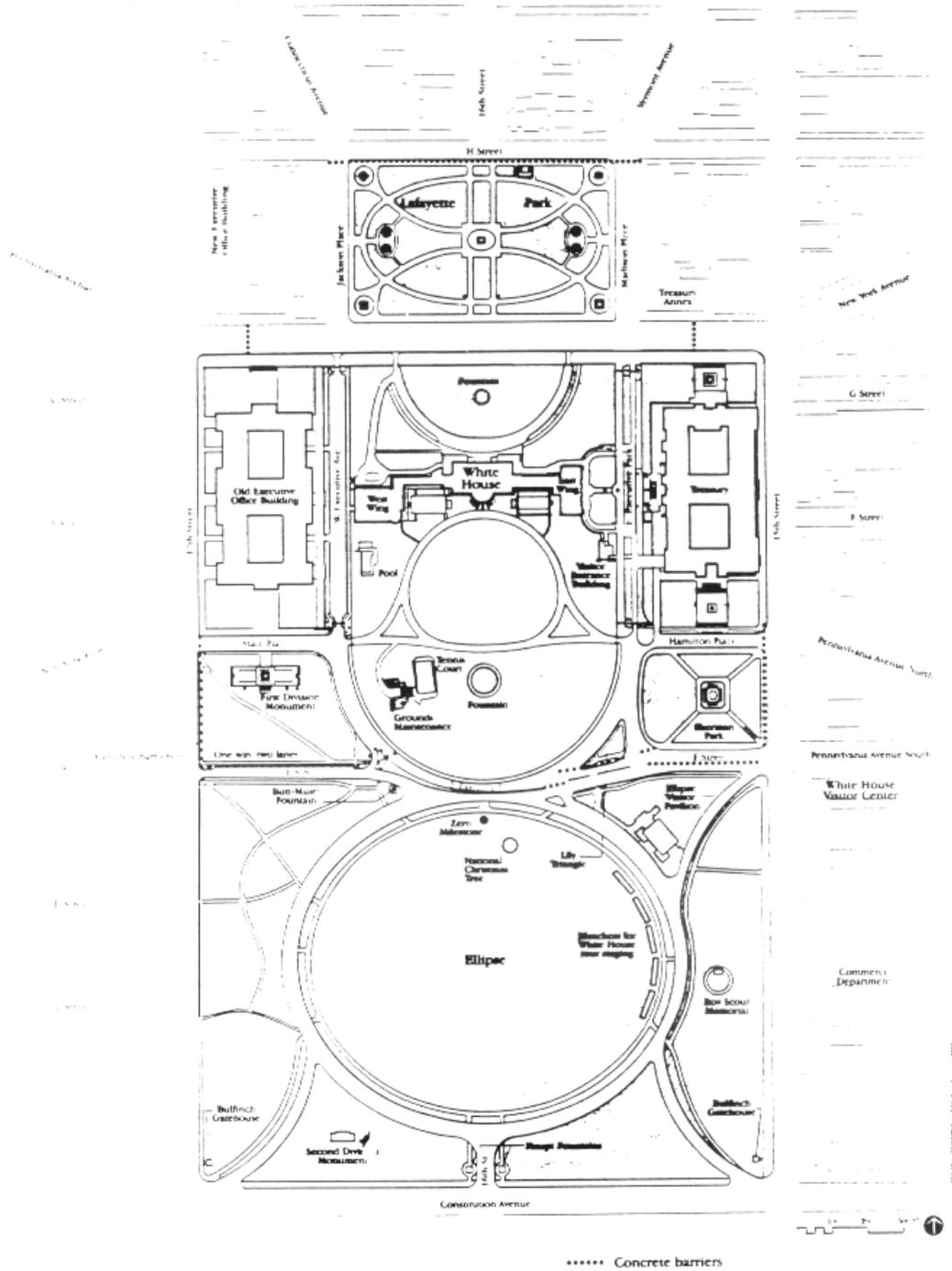
National Environmental Policy Act

NPS has submitted the draft EIS to the Commission for its comment within the public comment period. The Commission has commented both formally and informally during the drafting of the environmental document. In addition, the document contains some but not all of the elements of the Comprehensive Design Plan (master plan) that will be submitted in future to the Commission for final action.

National Historic Preservation Act

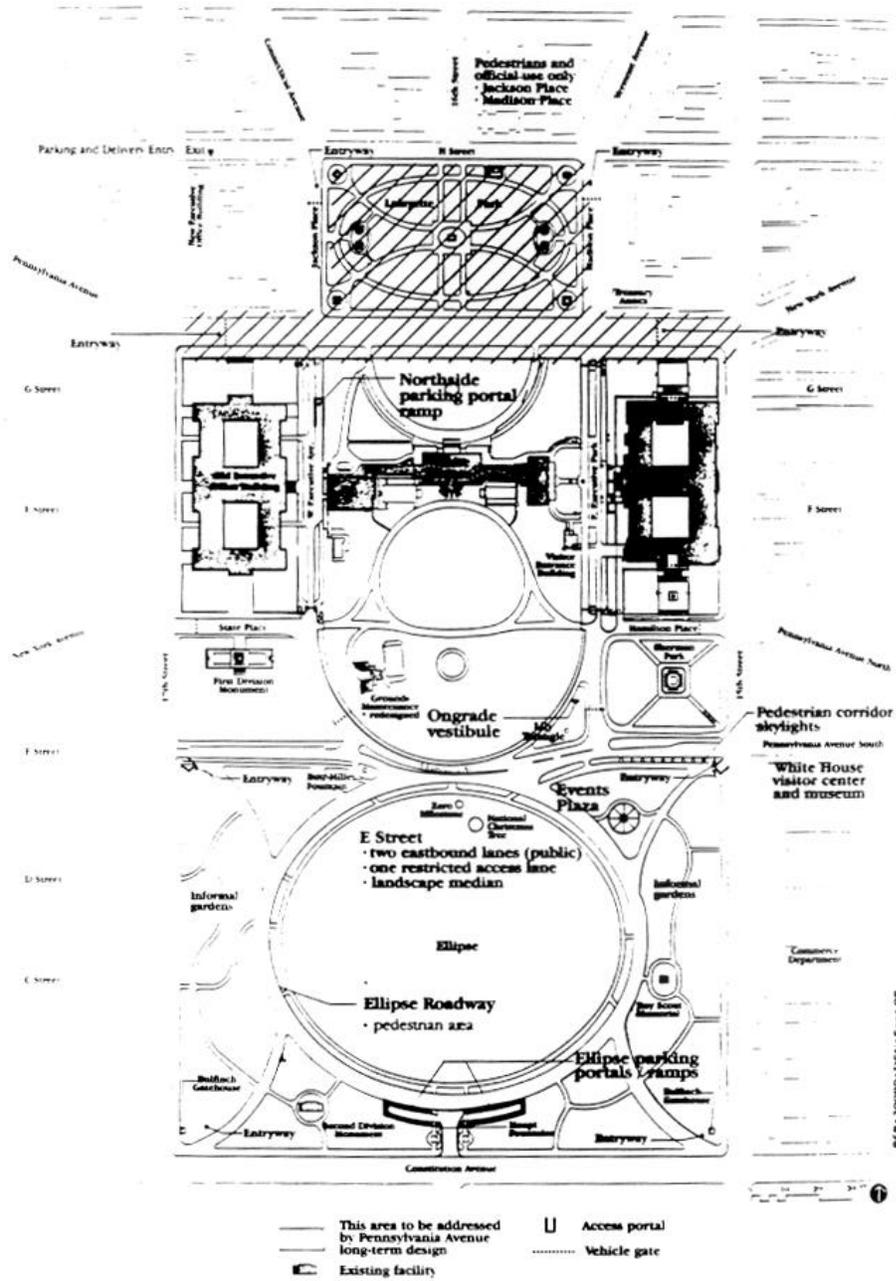
NPS is proceeding under a Programmatic Agreement (PA). This kind of agreement document serves as an umbrella document that describes agreed-upon methods for how a federal agency will meet its NHPA responsibilities.

The Advisory Council on Historic Preservation, like the Commission, is one of the federal cooperating agencies with which NPS has been consulting. NPS has also been consulting with the DC SHPO throughout the study.



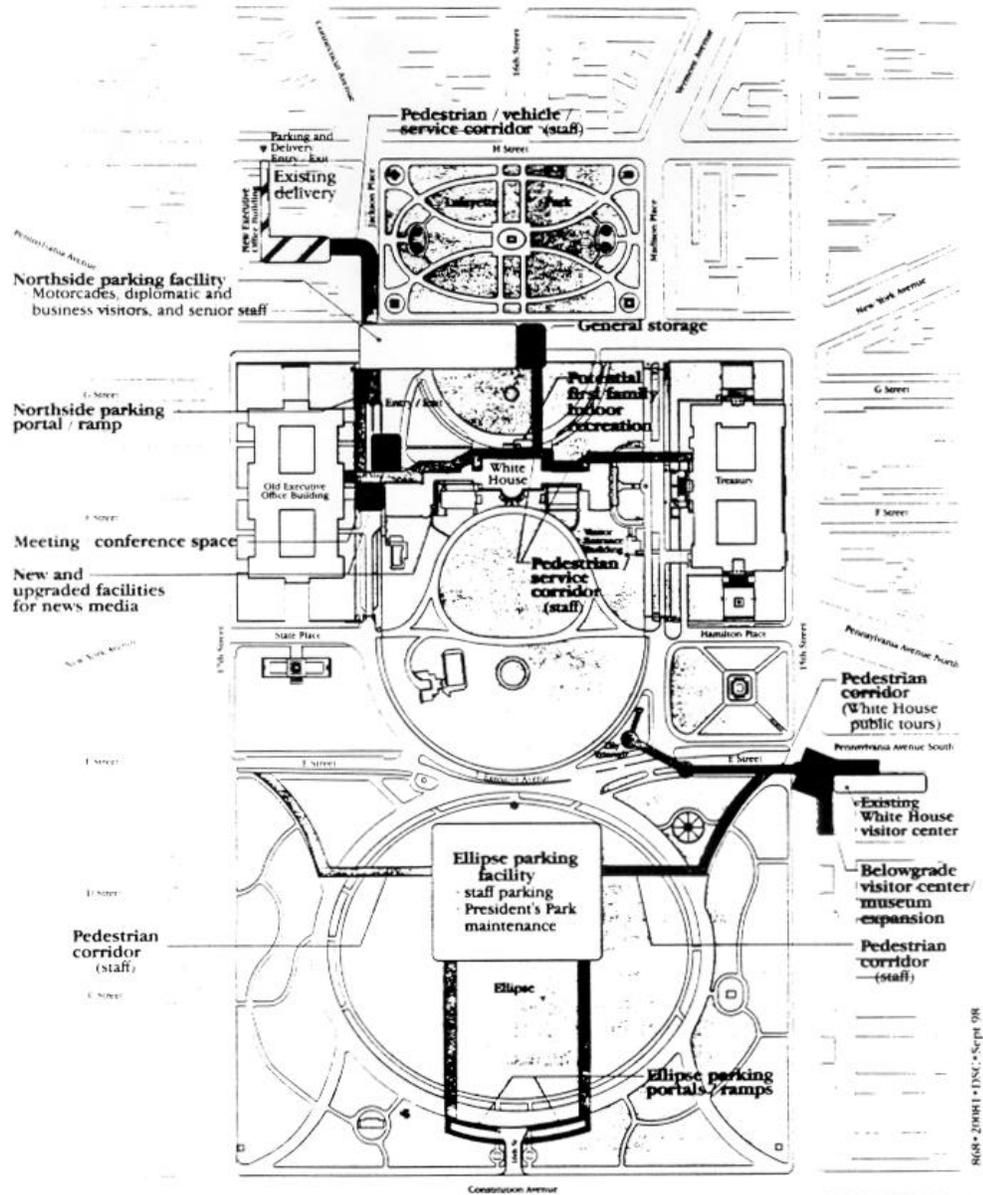
Existing Conditions





Aboveground
Proposed Plan



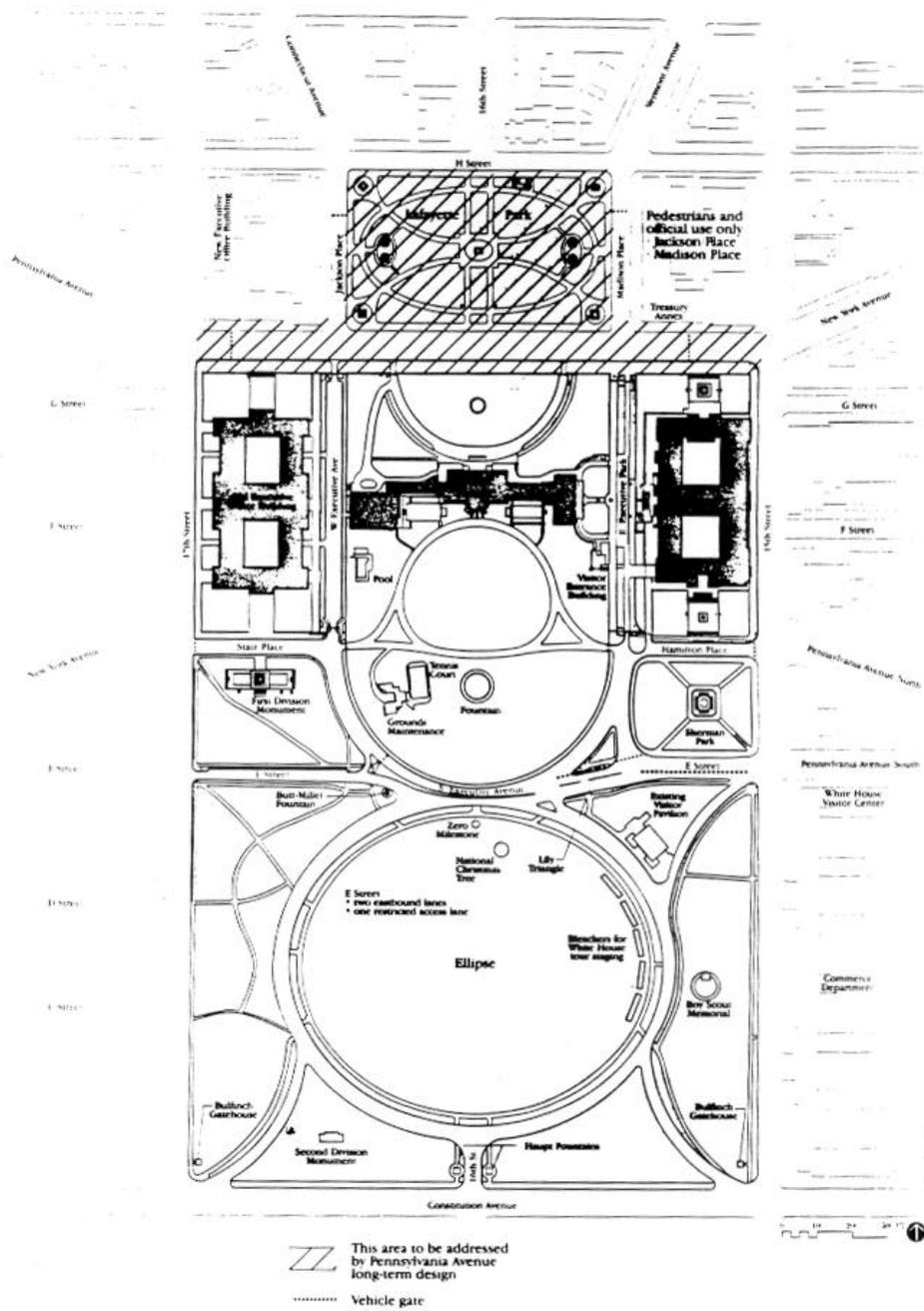


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-  Proposed facility
-  Proposed vehicle pedestrian corridor
-  Proposed parking
-  Access portal
-  Existing delivery

Belowground
Proposed Plan

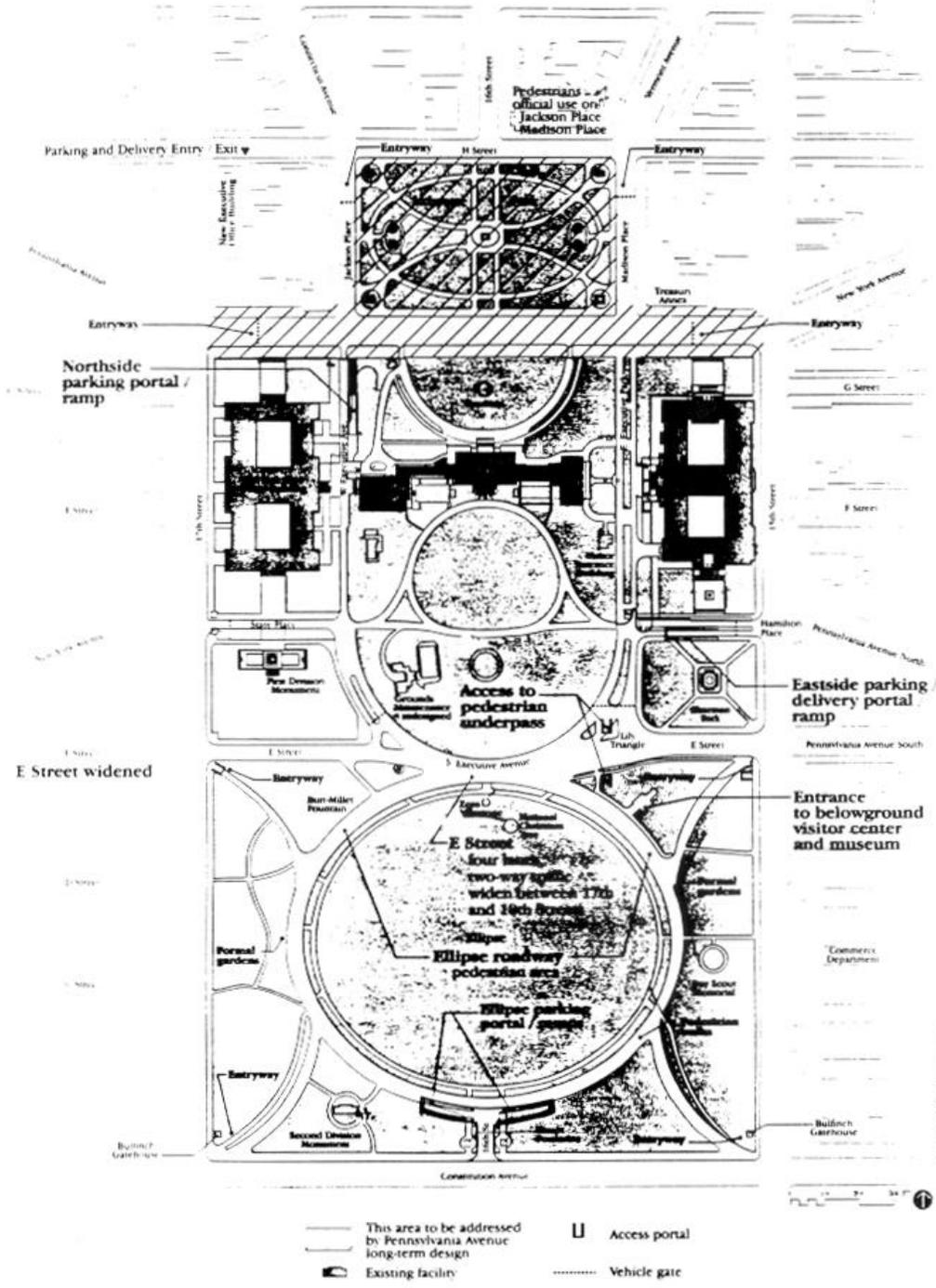




No Action

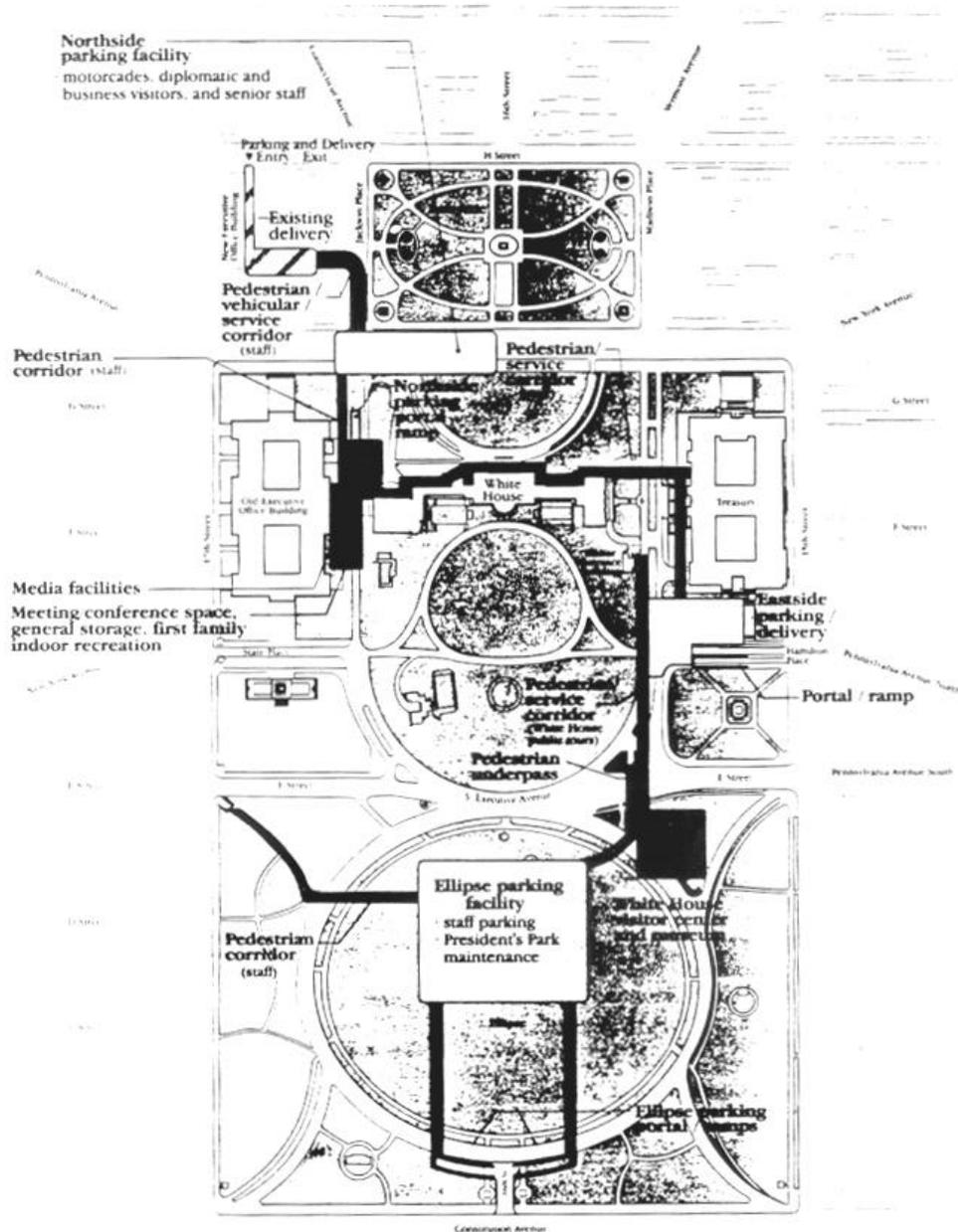
United States Department of the Interior / National Park Service





Aboveground
Alternative 1

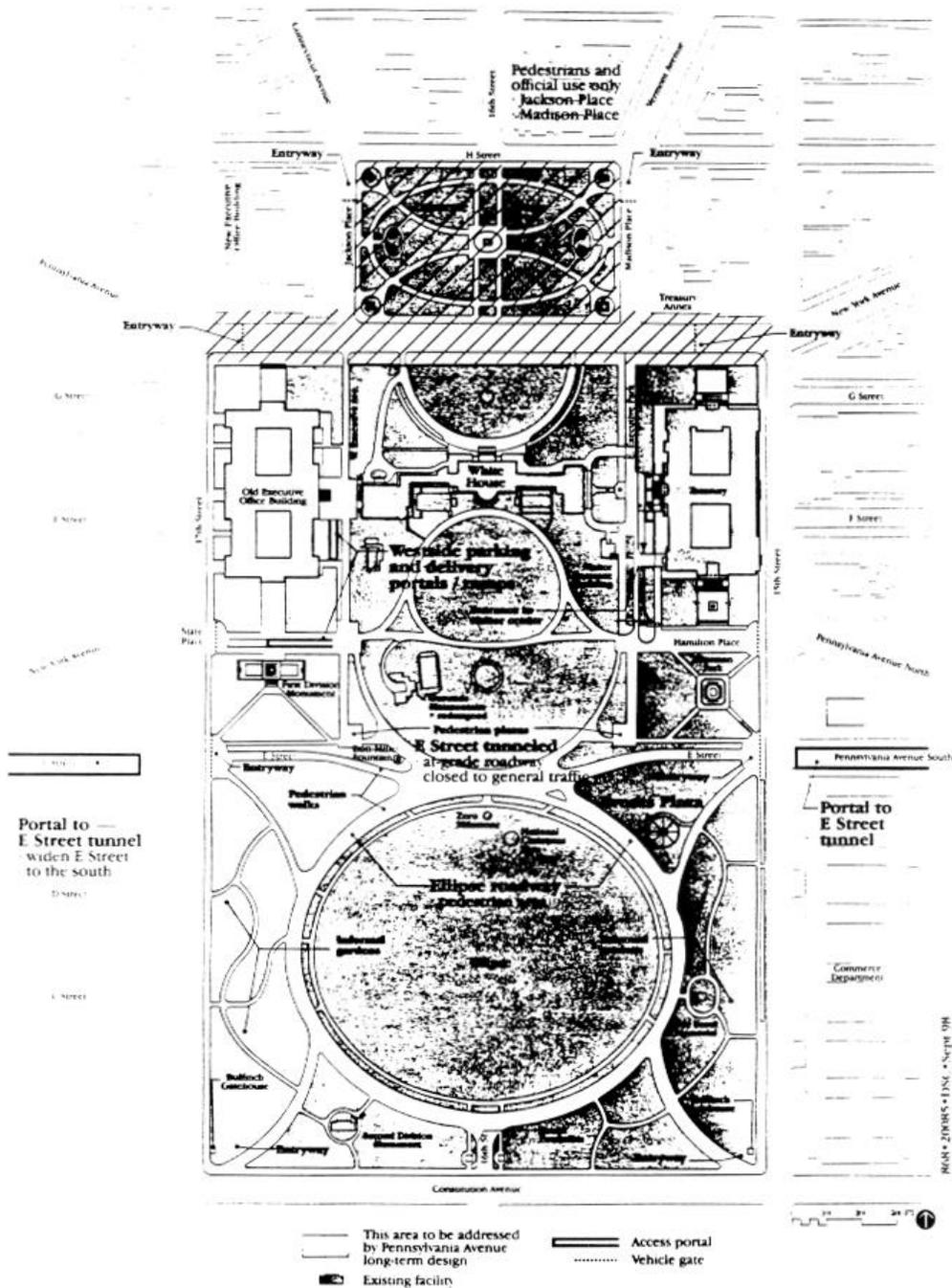




-  Proposed facility
-  Proposed vehicle pedestrian corridor
-  Proposed parking
-  Access portal
-  Existing delivery

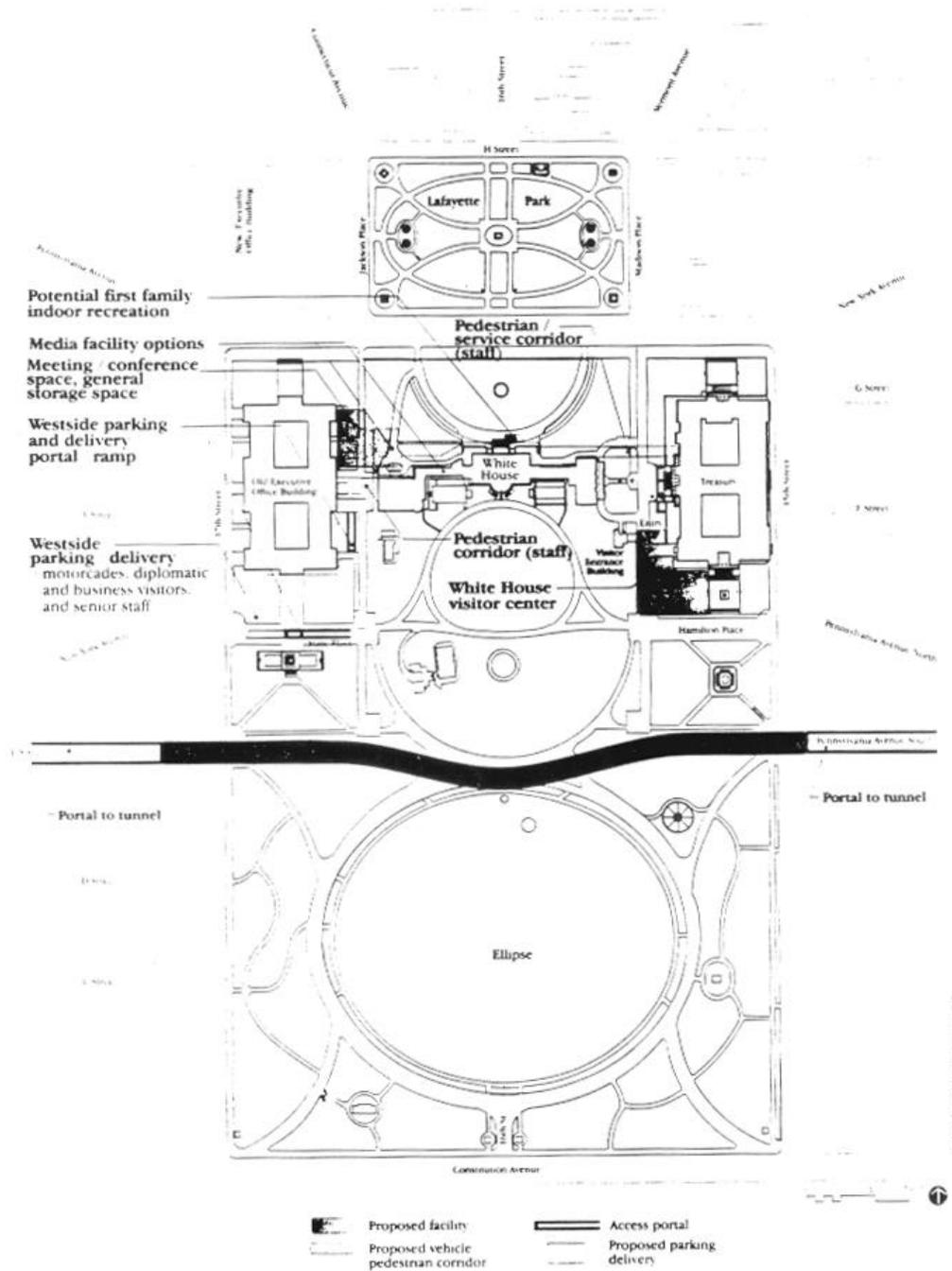
Belowground
Alternative 1





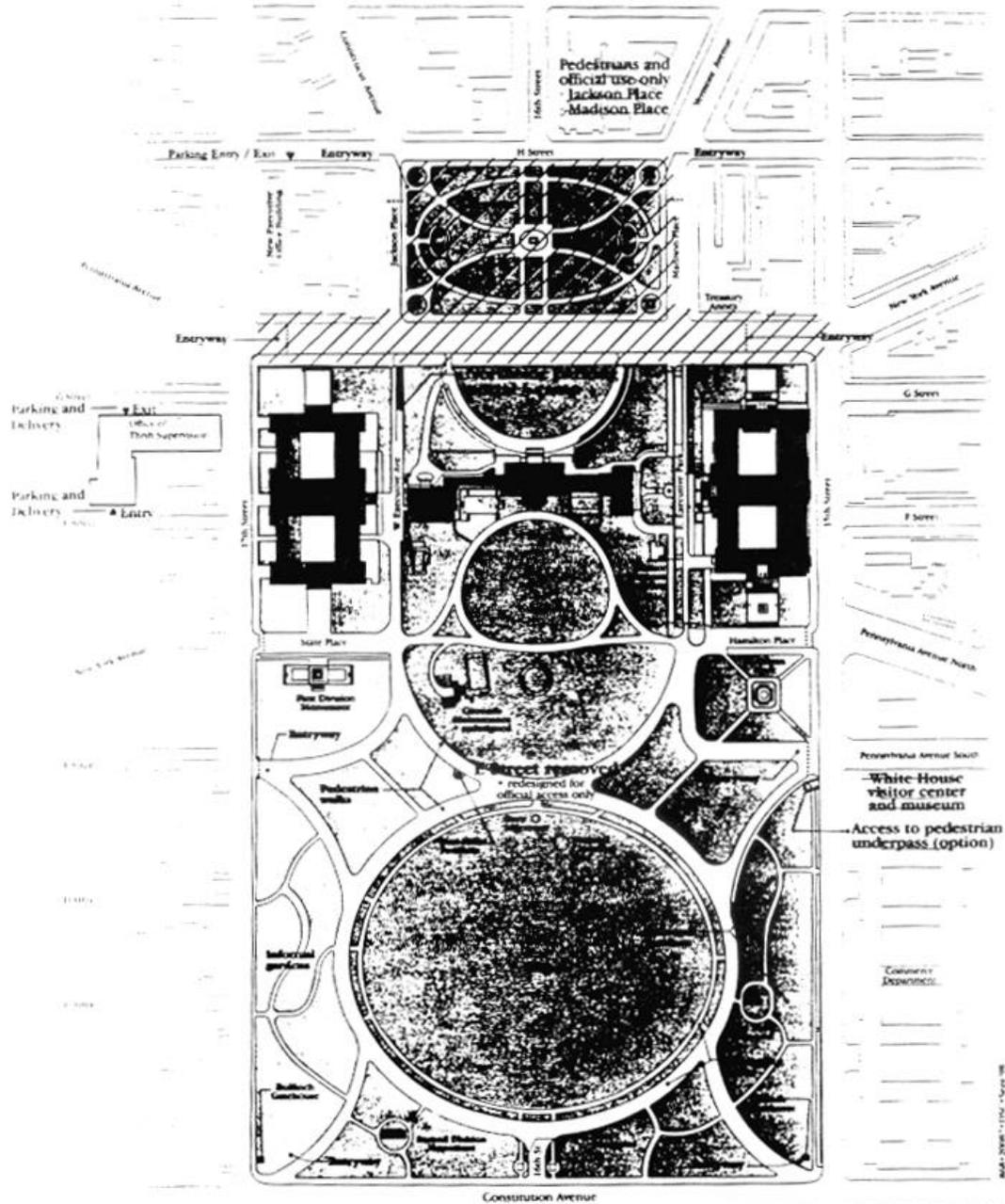
Aboveground
Alternative 2





Belowground
Alternative 2





-  This area to be addressed by Pennsylvania Avenue long-term design
-  Existing facility
-  Vehicle gate
-  Access portal

Aboveground
Alternative 3



NATIONAL CAPITAL PLANNING COMMISSION

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EXECUTIVE DIRECTOR
Reginald W. Griffith

IN REPLY REFER TO:
NCPD File No. CP31

MAR 11 1999

Mr. James I. McDaniel
Director
White House Liaison
National Park Service
National Capital Region
1100 Ohio Drive, SW
Washington, DC 20242

Dear Mr. McDaniel:

Thank you for the opportunity to review *The White House and President's Park: Comprehensive Design Plan and Draft Environmental Impact Statement*. We also thank Ann Smith for her briefing to us on the Plan at our meeting on December 3, 1998. This letter follows our letters to you of May 30, 1997 and June 19, 1997, in which we commented on the draft Environmental Impact Statement (EIS) and the proposed Design Plan. We have appreciated the opportunity to comment both formally and informally throughout the six years that you have been developing the Plan.

Our comments in this review are directed toward the draft EIS. Please note that the attached report focuses more specifically on some of the technical aspects of the document, now the subject of a public comment period. We look forward to reviewing your draft master plan (the Comprehensive Design Plan), which will come before us in the future, and remain ready to assist you in your further planning efforts.

We commend you for the quality and comprehensiveness of the elements of the Plan, as well as for the professionalism and thoroughness with which you consulted with the many cooperating agencies and the public in the development of the Plan. The five alternatives in the draft EIS reflect the many options that you considered in the development of your Preferred Alternative. We generally endorse the elements of your Preferred Alternative, recognizing that they balance many competing interests and that some of them are long-term goals that may have interim solutions. We believe that some elements require further study.

Nothing in these comments should be construed as accepting long-term vehicle restrictions on Pennsylvania Avenue in front of the White House. We have commented previously that although we understand the constraints on a full analysis of Lafayette Park and Pennsylvania Avenue at this time, the absence of those elements in the draft EIS makes it difficult to understand how the parks on either side of the White House will function together. This is especially true in light of your clear and laudable goal of enhancing the pedestrian visitor's experience throughout the precinct.

We reiterate our previous comments to you by noting again the well-developed assumptions of the framework and design guidelines for President's Park. You have chosen to limit new above-ground structures, thereby preserving the historic character of the White House and President's Park. In addition, you have sought a balance between the highly intensive use of the historic structures and grounds for the functions of the Office of the President and the importance of preserving the White House as a symbolic and accessible resource for citizens and visitors.

We endorse the removal of on-street parking and vehicular traffic from the precinct, as this is, in our opinion, the most effective means of enhancing the historic, park-like setting of the White House. This decision leads to impacts you discuss in the draft EIS. First, the loss of mature trees will have, over the next several decades until new trees can gain maturity, a noticeable negative visual impact on the character of the White House grounds. We believe, on balance, that the mature tree loss is acceptable in light of the long-term gains in efficiency and the removal of vehicles from the precinct. The removal of vehicles will enhance not only the appearance of the precinct but also the pedestrian experience itself. We strongly suggest that temporary planting be used in conjunction with the planting of replacement trees to provide the best possible appearance of mature shrubbery and trees in the near term.

Second, the removal of the metered parking and vendors around the perimeter of the precinct will have a negative economic impact on the District of Columbia. Again, on balance, we believe that the ultimate benefits to the appearance and functioning of the White House outweigh the negative impacts, provided that appropriate measures be taken with the District of Columbia as discussed in the draft EIS. In our opinion, further study of these fiscal impacts, as well as the impact to adjacent local businesses, is necessary. The attached staff report includes a more specific discussion of our concerns about the documentation of these impacts.

Third, the below-ground parking garage under the Ellipse is proposed to have access and egress from Constitution Avenue. This scheme not only introduces a significant utilitarian element on the symbolic White House view and 16th Street axis, but leads to impacts on traffic on Constitution Avenue, particularly at peak periods. We note that considerable design efforts will be needed to introduce portals to this significant, formal view of the White House and grounds.

Your Preferred Alternative, which seeks a balance between a pedestrian park and one incorporating a major commuter route, indicates both *interim* and *long-term* solutions for traffic on E Street. Your *interim* solution is the one now being studied by the Federal Highways Administration for four lanes of traffic, two in each direction. In your document, you state that the interim solution would be implemented in the near term and

Mr. James I. McDaniel

Page 3

would remain in effect until the District of Columbia made a comprehensive study of downtown traffic and implemented solutions to improve the level of service throughout the downtown area. You state that the *long-term* solution would narrow E Street to two lanes of eastbound traffic (with a third lane for official vehicles entering the precinct). This would decrease the volume of traffic through the precinct and presumably improve pedestrian safety.

While noting your reliance on future analysis of downtown traffic patterns and potential solutions by others, we urge a clearer discussion of both the long-term and interim preferred solutions for E Street (both in the text and in the matrix). The draft EIS refers to other steps to improve safety such as crosswalk escorts, a pedestrian passageway under E Street, or timed crossings. We encourage further study of such measures.

We note that Alternative 2 proposes a tunnel under E Street for vehicular traffic. We recommend against implementation of the tunnel. In the absence of other alternatives at present, the tunnel denies the drive-by experience so valued by all visitors to and residents of the Nation's Capital.

We commend you on your proposal for the events plaza at the northeast portion of the Ellipse. We concur with your opinion that this will be a significant improvement in the appearance of the Ellipse and urge early implementation. We endorse your concept of the enhanced Visitor's Center, including the underground walkway to the Lily Triangle with skylights in the median strip. We support your proposal to allow visitors to walk above ground along the South Lawn fence so that the White House can be viewed more fully from this perspective. As design development progresses, we look forward to seeing your solutions for the above-ground structures related to the walkway, as well as to the eight visitor entrances to the precinct. We believe these entrances will significantly enhance your ability to interpret the site for all visitors.

Please note on pages 5 and 6 of the attached report the areas of your impact analysis where we feel further study or discussion is necessary before completing the final EIS. We believe your analysis should be reinforced or expanded in the areas of traffic and parking, surface water, and visual impacts.

We note your intention to prohibit future memorials in President's Park. This accords with the Commission's efforts to develop policies to protect the central cross axis of the Monumental Core and to plan for future memorials.

Mr. James I. McDaniel

Page 4

We look forward to your submission of the draft Comprehensive Design Plan for our review. As noted in our letter of June 19, 1997, our master plan submission requirements contain elements now missing from the draft Plan. These include a more fully developed urban design framework diagram, a land use plan, a circulation plan, a detailed site development plan, and a landscape plan. They also include a transportation management plan, which we feel would further address many of the concerns we raise in our comments here. We are ready to work with you and your staff to provide assistance in your preparation of the master plan for final action by our Commission.

In summary, we commend the work you have done to date. We are pleased with the framework for decisions you have established for this nationally significant site and look forward to the successful completion of your environmental document and to our review of your master plan submission.

Sincerely,

(Sgd. David A. Nystrom)

Reginald W. Griffith
Executive Director

Enclosure