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# PARKS & OPEN SPACE ELEMENT

## (DRAFT RELEASE)

### LIST OF COMMENTS RECEIVED

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#### **Notes on List of Comments:**

- This document lists all comments received on the Draft 2018 Parks & Open Space Element update during the public comment period.
- Comments are listed in the following order
  - *Comments from Federal Agencies & Institutions*
  - *Comments from Local & Regional Agencies*
  - *Comments from Interest Groups*
  - *Comments from Interested Individuals*

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Comments from Federal Agencies & Institutions

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# United States Department of the Interior

NATIONAL PARK SERVICE  
National Capital Region  
1100 Ohio Drive, S.W.  
Washington, D.C. 20242

IN REPLY REFER TO:

May 14, 2018

Ms. Surina Singh  
National Capital Planning Commission  
401 9th Street, NW, Suite 500N  
Washington, DC 20004

RE: Comprehensive Plan - Parks and Open Space Element Comments

Dear Ms. Singh:

Thank you for the opportunity to provide comments on the draft update of the Parks and Open Space Element of the Comprehensive Plan for the National Capital: Federal Elements. The National Park Service (NPS) understands that the Element establishes policies to protect and enhance the many federal parks and open spaces within the National Capital Region and that the National Capital Planning Commission (NCPC) uses these policies to guide agency actions, including review of projects and preparation of long-range plans.

Preservation and management of parks and open space are key to the NPS mission. The National Capital Region of the NPS consists of 40 park units and encompasses approximately 63,000 acres within the District of Columbia (DC), Maryland, Virginia and West Virginia. Our region includes a wide variety of park spaces that range from urban sites, such as the National Mall with all its monuments and Rock Creek Park to vast natural sites like Prince William Forest Park as well as a number of cultural sites like Antietam National Battlefield and Manassas National Battlefield Park. Noteworthy park sites in the region include the Frederick Douglass National Historic Site, the George Washington Memorial Parkway and the C&O Canal National Historical Park. The variety of types of land that NPS administers and their locations within the region pose many challenges, many of which have been captured in the updated Parks and Open Space Element.

Specific comments to the updated element are attached. Generally, the updated element effectively captures many of the issues that face the NPS and the parks and open space we administer, and provides policies that will be helpful in the future. However, while the Parks and Open Space Element purports to provide policy for the entire region, the draft is much more DC-focused than the previous version. It is notable that NPS staff from many of our parks that reviewed the updated Element believed that it only applied to DC parks. The updated element lack references, descriptions, and planning context that are regional in context. We suggest NCPC further update the element to reflect the entire region and its issues.

We look forward to working with NCPC further support the update of this very important element of the Comprehensive Plan. For further coordination, please contact Tammy Stidham at 202-619-7474 or via email at [tammy\\_stidham@nps.gov](mailto:tammy_stidham@nps.gov).

Sincerely,

Peter May  
Associate Regional Director  
Lands and Planning

Page Number	Comment
General	The Element is suppose to cover the entire NCPC region, and while the language in the narrative oftens refers to a regional context, it is written to highlight DC centric planning efforts, issues, examples and characterizations. The Element lack references and descriptions that characterize the region that is administerd by NCPC
General	All references to NPS areas should be stated as NPS "administers" and not "manages" these parks
General	Give it a hard edit - lots of typos/missing words
General	Active recreation is not sufficiently discussed – this includes rec. uses like skateboarding, sports fields, playgrounds, dog parks, etc.
General	Please note that West Potomac Park and the Tidal Basin are part of the National Mall.
General	Be specific when you refer to barriers throughout this document. I believe you are referring to barriers that prohibit access, but it should be more clear.
General	More information and references need to be added for other federal parks and open spaces. Right now a majority of the information and references are NPS.
4, 2nd par	Should add President's Park, Rock Creek Park, maybe something like Frederick Douglass NHS to be inclusive.
4	2nd full par - parks and open space are also civic space in DC, offering areas for national celebrations, special events and First Amendment gatherings. Additionally they may provide connection with citizens about American history and values and what it means to be an American.
4	add Rock Creek Park and Greenbelt Park on list of open spaces in para 2.
4	Midle Paragraph - change environmental to natural
4	Balancing National and Local Interests - This paragraph seems to say the same thing several times. Suggest simplifying. Also it provides statisticed for parks only (no open space) within the district of columiba. This section should contain statistics for parks AND open space for the region to provide and overall context for the element.
5	<p>Parks and Landscapes – not sure if these are best way to describe categories. Many parks in NCR have designed or historic components – even if they are primarily natural in character. As pointed out majority of designed landscapes are historic parks. Therefore Historic Park appears to be redundant. Suggest the primary functional character type be used. What about recreation area, urban neighborhood parks, or recreation fields category? Maybe just call them all Recreation Areas</p> <ul style="list-style-type: none"> <li>· Designed Landscape / Cultural Landscape</li> <li>· Natural Park or Area</li> <li>· Recreation Area</li> <li>· Waterfront Park – rivers, waterways</li> <li>· Parkways</li> <li>· Trails and Greenways</li> </ul> <p>Suggests being consistent with National Register terminology wherever possible throughout document – not only categories – but when describing contributing features. This will help avoid confusion and support use of consistent terminology.</p>
5	Last three bullets are characteristics of Parks and Landscapes – why not just discuss under the relevant park and landscape type.
5	Consider adding a 6th type of landscape: Recreational Park. Landscapes focused on recreational activities such as hiking, camping, picnicing and ball fields.
5	Should Designed Landscapes and Hlstric Parks be combined?
6	Under Provide Stewardship of Natural and Cultural Resources - there is a statement that the federal government is the primary landholder of parks and open space. While I believe this is true in the District, I doubt it holds for the region as there are an abundant of state and local parks. Check the statistics to back up this statement

6	Under Provide Access to and connections between parks and Open Space - This section fails to recognize the need for wildlife corridors. Also refers to parks as a network, you might want to change this to a system as they are not a roadway and tend to be more like a system as there are processes depending on their connectivity and association with other park spaces. Also, at the bottom of page 6 there is a sentence "...but some remain difficult to access and are uninviting to the public." I don't think this is an accurate statement and does not add to this section. Suggest removing it.
6	Principles – suggest some rewording and reorganization <ul style="list-style-type: none"> <li>· Protect legacy of parks and open space design</li> <li>· Encourage stewardship to wisely conserve natural (NR) and cultural resources (CR) – these may need to be two different bullets</li> <li>· Improve access to connected parks and open space</li> <li>· Encourage multi-use parks and open space to meet needs of all people</li> <li>· Reinforce community identity and/or agency branding of parks and open space (new)</li> <li>· Design commemoration to accommodate flexible programming</li> <li>· Coordinate a collaborative open space network in the NCR (partnerships are one method)</li> </ul>
7	does the commemorative works piece apply to all parks in the region? Or just the District? If just the District that should be made clear.
7	Par 3 – 2nd line – intrinsic (not intricate) elements of viewshed  Sacred space - Don't use the word "sacred" which may have a religious overtone; say something like, "the program for some commemoration may include space for quiet contemplation where some uses may not be appropriate or may be offensive to group or issue commemorated." This is why CFR 7.96 includes restrictions on uses in some areas – which may need to be mentioned.
7	Need to define Monumental Core earlier – since open space in the Monumental Core often has a federal symbolic, civic, celebratory, or commemorative purpose.
8	Starting on Page 8 - There are many paragraphs regarding the planning and design for park and open spaces in this section, but they are all DC focused and there are no planning efforts or initiatives that are regional in focus. Since this element is to be regional additional information should be added to this section to give context to how the parks and open spaces developed as a regional system.
8	Principle for L'Enfant – add "spaces for commemoration"
9	Why not add AJ Downing in Victorian Era? Note that ROCR one of first National Parks created - in 1890. Memorials on National Mall also included Grant to east (now within AOC)
11	Glen Echo was amusement park by 1911 and closed by 1968 before its new life – so it may be in the wrong spot.
11	What about other planning initiatives for other federal agency parks and open space elements? Again this section is too DC focused and not regionally focussed
11	4th par. 1970s planning principle was pedestrian oriented with removal of vehicular use other than tourist related buses on National Mall. 1970s planning dealt with Nat Mall and much of the Monumental Core  Combine last two sentences – use Pershing new name. Not sure you should characterize Western Plaza as now Freedom Plaza – since it was larger.
12	Legacy principle – what about creating identity for areas and connecting open spaces
13	Call out box related to Rock Creek - there are many cultural resources that are significant in Rock Creek. Calling out the archaeology as the only thing does not make sense. I suggest replacing Rock Creek with a different park such as Carter G. Woodson, Mary McCleod Bethune or Frederick Douglas.
13	A.5 West Potomac Park is within Nat. Mall. "Activities should be dispersed to venues throughout the Monumental Core and NCR that are designed to absorb use without environmental or CR damage." National Mall planning called for dispersal to venues designed to accommodate repeated high use.

13	Add President's Park to historic parks (or whatever the topic is called). Last par. Penn Ave is a symbolic grand ceremonial boulevard
13	POS A.1 - 7 include the word PRESERVE - we have had challenges with the term "enhance" - In fact, make sure preserve is in each of these that mention historic or designed. Can some of these be combined?
13	historic parks - Add National Mall and Memorial Parks to prominent historic parks. it is both an historic park and a cultural landscape
14	C&O Canal National Historical Park - use this or C&O Canal NHP throughout the document.
14	Par 3 - Why Prince William not listed in Natural Parks with reference to CR – all parks in NCR likely are both cultural and natural Memorials like John Marshall Park are treated by NPS as if they are eligible for Nat Register
14	John Marshall as an example, may be eligible regardless of age. It has not been evaluated for listing (I'd have to verify if we have a CLI... we might)
14	Reference to Fort Circle Drive. This needs to be expanded to explain that while the land for the fort drive was acquired for the most part, the drive was never completely constructed which has created this ring on parks and open space that connects the entire city.
15	This page should talk about retaining character defining features vs. adaptability.
16	POS A.10 – differing instead of competing (less values laden). Suggest “Balance preservation with adaptive reuse of cultural resources to meet contemporary needs for parks and open space.” .12 – too wordy. Simply state that rehabilitation should consider original design intent
16	Para 2. Provide context to the new highway systems being constructed. In 1950 Congress established the Baltimore-Washington Parkway to link major federal facilities such as Fort Meade to Washington DC. By 1955 the 18.6 mile section of the B-W Parkway was completed with land allocated for further development of a "Greenbelt Park".
19	Add BW Parkway to par 1 P 5 shows this topic as Rivers and Waterways – Seawalls conditions - just list where occur. West Potomac Park and Tidal Basin are within the National Mall – so suggest National Mall seawalls along the Potomac River and Tidal Basin. Erosion and aging in addition to rising waters impact seawalls. Waterfront parks in urban or developed commercial areas are becoming more common.
19	Para 1. Three of the areas largest greenways are not mentioned. Include George Washington Memorial Parkway, Suitland Parkway and Baltimore-Washington Parkway.
20	Line 1 – like East and West Potomac Park and Tidal Basin within the National Mall include a number of memorials. (EPP does not currently contain many memorials)
21	3rd par. CR – Anacostia Park – history contributes all these things (Native Americans are not events) Maybe add Frederick Douglass House to this listing of places that influenced history and raise awareness Stewardship Opportunities. Most of this relates to what NPS and other federal agencies are required to do. Federal land help protect viewsheds in adjacent cultural resources such as Mt. Vernon or other privately owned cultural open spaces.
22	2nd par - sentence about others and less maintenance is not clear – remove. Where is light pollution impact discussed? It affects NR and CR as well as people. Why not discuss shorelines under waterways – and geography under terrain?

23	May want to state in prin B.1 protect and improve conditions of terrain features
24	List is way too long. There are many EOs about sustainability. Make about 5 strong principles. Too much and no one will read this. How about a principle to reduce stormwater runoff, water pollution and use of potable water while improving water quality?
26	Designed landscapes may include non-natives – particularly in the Monumental Core. Suggest – increase use of natives outside those with defined non-native CR plantings. Why a separate sustainable list? All stewardship opportunities. B21 – expand opportunities.... B 22 – Promote environmental and CR stewardship throughout the open space through educational programs, signs, mobile tech etc.
27	1st par – coordinated not unified park and open space 2nd par – add bikeways and multi-modal transportation to pedestrian friendly network
28	2nd par. “Passive” not needed when referring to natural areas. Do not say someone is impaired – which implies less valuable. They may have mobility limitations or differing abilities. 3rd par – what connections were lost and need to be reestablished? Last par – north and south ovals reference is not clear. Why not discuss Teddy Roosevelt Island someplace as well for improved connections; how about incorporating safe multi-modal bike and ped use into parkways.
29	Views from Banneker now blocked by development
30	Par about trails plan should be located by graphic. 3rd par delete 2nd sentence - obvious Capital Trails Coalition – like Bike groups – could be under stewardship section.
31	Somewhere discuss historic uses such as bridle trails now used for multi-use; need to be sufficiently sized for today’s types of uses. Educate about past horse use. 2nd par – replace last sentence with “Agencies should periodically assess security requirements to see if additional public access is appropriate.” C.1 – Improve connections C.2 - Overcome or remove barriers C.3 - Create multiple access points from communities
32	C.4 – Connect open space C.5 – Encourage access to waterfront parks through... C.8 - Identify opportunities to connect multi-use trails and users C.11 – Provide safe, convenient connections through and around barriers such as roads and bridges

33	<p>Par 1 – environmental protection not a use but a requirement</p> <p>Orig parkway purpose was scenic recreation, but changing demand and use means that commuter traffic needs to be safely combined with other multi-use circulation and open space opportunities along parkways</p> <p>2nd par – Neighborhoods may also temporarily close roads for events such as walks or runs or block parties</p> <p>3rd par – not clear if monumental means commemorative or large spaces in this sentence</p> <p>4th par – rewrite Meridian Hill to just state is accommodates a wide range of uses (examples) within its well-connected space.</p> <p>Impromptu activities are especially compatible with urban park areas because they....</p> <p>CHOH also has group camping, camping, and lock house overnight rentals. Mention camping is prohibited in many NPS urban parks as per CFR 7.96.</p>
33	<p>Para 1. Change the general statement about parkways into an actual example. Reference the Baltimore-Washington Parkway's evolution from a scenic roadway into a major commuter corridor and continuing efforts to balance original intent with modern needs.</p>
34	<p>Does this section need to discuss entry fees for some federal park or open space areas?</p> <p>Why not consolidate parkway discussion – which needs to recognize that commuter high speed driving is scenic and more pleasant within a parkway experience (and could be taken over for development if this use is not accommodated).</p> <p>2nd to last par There is recreation use (hiking, biking, etc.) as well as driving on parkways. What about Claude Moore Farm – which offers a historic immersive experience?</p> <p>Development visually may encroach in some areas – may want a principle that sets graduated building height transition limits to protect from urban visual intrusion within wooded and natural areas or cultural areas. D.4</p> <p>Older NPS guidance (1930s CCC may be useful here) The reprinted Albert Good book – Park &amp; Recreation Structures provides useful philosophy, etc.</p>
35	<p>Note that primary commuter routes are not safe for bikes and pedestrians. Visiting drivers may not be aware of crossings as the roads meander.</p> <p>Doesn't Suitland also have considerable amount of motorcades?</p>
35	<p>Para 5. The B-W Parkway also serves to connect extensive federal facilities such as USDA's Beltsville Research Area, NASA's Goddard Spaceflight Center and Fort Meade.</p>
36	<p>Add D.8 Incorporate convenient, safe, separated multi-use trails systems within parkways.</p>
37	<p>Mention the 2M Plan in this section as well as the CWA and Reserve, Area 1 and Area 2. It might be helpful to provide very generic guidelines related to context sensitive commemoration from the CWA, or its definitions of commemoration.</p> <p>Par 1 – connected to park system in first line</p> <p>Par 2 – TR island is different non-urban experience</p> <p>Last par, 3rd sent – add, "...commemoration may create the identity of neighborhoods or communities."</p>

38	<p>Par 1 – WWII good example of protecting views in design.</p> <p>3rd par - Size and scale depend on what is being commemorated. It is the memorial site not building envelop.</p> <p>4th par – add roads to the first sentence. All memorials may have constituencies or uses that are unique. The Navy Memorial programs relate to their constituency while the memorial also supports adjacent business and use by preschools and local residents and dog walkers.</p>
38	<p>Commemoration also needs to be designed to flexibly accommodate a range of programs and activities. Many memorials develop a constituency and have commemorative events or ceremonies. Air Force and MLK are typical of that with newer memorials.</p>
39	<p>Par 2 – consider whether commemoration is likely to become a tour-bus destination and plan for that use.</p> <p>Par 3 – design recommendations and comments by commissions</p> <p>E.1 – don't use the word “sacred space” – this is about use that respects and honors the purpose of the commemoration. May want to identify purpose as something that could affect use – which may need to be called out in CFR 7.96. Maybe something like, “When designing memorials consider contemplation, ceremonial and flexible public uses.”</p> <p>E.3 - Identify potential spaces for commemorative programs and experiences (2M plan). Is this the same as comment above</p>
40	<p>.6 – color, texture and materials as well</p> <p>.7 – context sensitive design is the principle</p> <p>Programming will always need to be creative. Innovation may be a separate topic that could be at the beginning of the section after introducing CWA, 2M, etc. Move last par up.</p> <p>Navy Memorial Callout –last sentences – add that memorial, park and commercial uses can work together</p>
41	<p>Don't know what E.10-E.12 add. They are all technically accommodated in CWA or authorized as temporary memorials through permitted activities.</p>
42	<p>The method is partnerships – the principle is use coordinated collaborative approaches to make a cohesive park and open space network</p> <p>Coordinated Regional Open Space Network.</p> <p>3rd par Might want to note that rehabilitation and development, as well as operations can be provided by partners</p> <p>Last par. Some uses or environmental conditions – rodents, drugs, hiding places, skateboarding that damages resources, and other undesirable uses should be deterred in all rehabs of parks or memorial design.</p> <p>Last par – improve condition which will improve character</p>
43	<p>4th par – is this POS plan redundant with CapitalSpace or Small Parks Plan?</p> <p>NPS' National Mall Plan and Pennsylvania Avenue Mgt Plan both strongly support use of partnerships, coordination, and collaboration.</p> <p>Last par – add events and celebrations after local commemoration</p>
44	<p>May need to have referred to other plans by NPS for parks. NAMA has a number of plans - National Mall Plan – (Note - Foundation Documents are not plans but may identify current plans, or planning needs)</p> <p>Callout - Courthouse is a big stretch as a success – just recognized what occurred – the visual impact is stark</p>

45	<p>Some of this is ongoing – so use the word continue in most of these. Several of these could be consolidated to have fewer strong statements.</p> <p>.1 - add connected after cohesive  .2 – continue to develop partnerships for coordinated open space with...  .3 – continue to coordinate  .4 – not needed this was address in other section – multi use and commemoration  .5 –transfers to DC to meet local community needs  .6 - partnerships stronger than relationships – usually means a signed agreement</p>
10 – d)	Green spaces and plazas are/ were public open space amenities
10 c.)1	<p>The commissions review buildings as well as parks and open space.</p> <p>National Mall is within the Monumental Core so no need to call it out separately</p>
10 McM prin	<p>Add or revise – Established and reinforced neoclassic architectural character within the Monumental Core.</p> <p>Might be worth providing dates establishing CFA and NCPPC to implement McMillan vision.</p>
11 – 1st par	Last sentence needs to be revised to just place commas between areas – it sounds like NGA and L’Enfant Plaza and other things described are connected
12 f)	Note who prepared plans. 1st and 2nd were NCPC, 3rd by DC. Mention that other agencies (Montgomery County, NPS) have plans for parks and open space under their jurisdiction that may include specific guidance.
15 – 2nd par	<p>Designed landscapes are affected by redevelopment – “vulnerable” is a values word – as is “barriers.” Roads, bridges, security, changing demographics and time (age of veg, aging infrastructure) affect access, conditions, safety, rehabilitation and use of open space and parks.</p> <p>POSA.9 – shouldn’t this be NCR instead of Washington?</p>
17 Sect B	<p>May need to separate Nat Res (NR) and move Cultural Resources (CR) to previous section. Note that NPS mission is to conserve both NR/CR unimpaired for future generations.</p> <p>Revise last sent in par 1. Many open spaces are cultural resources that preserve and ....”</p> <p>Stewardship includes significant education about NR and CR resources, care and preservation, importance of resiliency, and environmental value or consequences, as well as what individuals can do to be good stewards.</p> <p>Callout box. Great Falls – managed by 2 NPS units – GWMP and CHOH</p> <p>Why not ROCR under terrain? It was reason for establishment. Move it up before general regional landscape described.</p>
17, 4th para.	Most of the unique geology, hydrology and natural communities in this area is found in the river or on the islands, many of which are owned/managed by CHOH.
18, 2nd para.	The wording is odd in the first sentence. I suggest replacing "through" with "and". As written it seems like they are saying Potomac Gorge is in Rock Creek Valley.
20, 2nd para.	Rock Creek Park does not extend into MD. In MD the park is Rock Creek Regional Park which is managed by M-NCPPC.

29 - edit to read the following	<p><b>Edit to read the following</b> - One of 30 Congressionally-designated scenic and historic trails in the National Trails System, the Potomac Heritage National Scenic Trail (PHT) is an evolving network of locally-managed trails between the mouth of the Potomac River and the Allegheny Highlands. The authorized PHT corridor embraces portions of five physiographic provinces; many parks and protected areas, historic sites and communities; and, notably, the Nation's capital. One of the most historically significant corridors in North America, places associated with the PHT network collectively trace the evolution and reflect the diversity of the Nation. Within the DC metropolitan area, segments of the PHT network include the Chesapeake &amp; Ohio Canal Towpath, a walking route connecting many Civil War Defenses of Washington, various Potomac Heritage Trail segments in Northern Virginia, the Mount Vernon Trail and the Southern Maryland On-Road Potomac Heritage Trail Bicycling Route. In various ways, the authority for the PHT is being used to make connections, physically and institutionally, and as a tool to increase outdoor recreation opportunities; non-motorized transportation options; and heritage tourism experiences.</p>
3 – 2nd to last par	<p>Other federal facilities – may be fairly insignificant issue to parks and open space to be upfront in the document.</p> <p>Note that limited access locations do provide open space for their staff and others. May be worth mentioning that a number of privately owned public open spaces that charge entry fees include Mt Vernon, Hillwood, Gunston Hall, and or accept donations (River Farm - American Horticultural Society).</p>
3, Goal	<p>Needs to be more inclusive. Suggestion</p> <p>“The federal government’s goal is to protect and enhance the NCR parks and open space system to meet the needs of diverse users of all ages and abilities for recreation; commemorative and symbolic space; social, civic and celebratory space; and provide environmental and educational benefits. The parks and open space diverse users include groups and individuals who are visitors, residents, educational travelers, workers, and future generations, as well as federal and local agencies.”</p>

**Project Name: NCPD Draft Federal Parks & Open Space Element**

**Design Review Comments: GSA - Office of Planning and Design Quality**

**Comments Due Back: 5/7/2018**

ITEM	DISCIPLINE	PAGE	SECTION	COMMENT	AUTHOR	DATE	ORG
1	Planning	3,4	Introduction	It would be valuable to see which parks and open spaces NCPD believes fall under GSA jurisdiction, and if this has changed from previous years.	Marc Poling	5/7/2018	GSA - OPDQ
2	Planning	15	Adapting Designed Landscapes	Although the L'Enfant and McMillan plans are highly significant historically, we should be careful not to always defer to them and potentially sacrifice strong planning and design principles, as well as context sensitive solutions, to uphold them.	Marc Poling	5/7/2018	GSA - OPDQ
3	Planning	26	Responsible Practices to Protect Natural and Cultural Resources	Additionally, it may be prudent for the federal government to hand over maintenance responsibilities, or even ownership, of particular parks and open spaces to local groups or jurisdictions. Many of the federally owned and maintained parks and open spaces throughout the NCR go improperly unattended due to various factors. Local organizations with a direct investment in them could probably have a more positive impact on the health and appeal of these parks and open spaces.	Marc Poling	5/7/2018	GSA - OPDQ
4	Planning	32	Federal Open Spaces	The federal government should also start to think about making green connections between their built facilities, spurring healthy and active transitions from building to building.	Marc Poling	5/7/2018	GSA - OPDQ
5	Planning	36	Parkways as Scenic Routes	The federal government should implement additional park or open space elements too, such as pop-up parks, parklets, shared streets, or vehicular limited streets, to the extent possible to promote public space.	Marc Poling	5/7/2018	GSA - OPDQ
6	Planning	40	Siting and Designing Commemorative Works	Federal employees should not get lost in the shuffle. Many of these recommendations are catered toward the public, visitors, tourists, and passers-by. Although the federal government has to improve their presence and interaction with the public, we should make it a point to plan and design parks and open spaces for the health and well-being of the federal employees that work at or near these properties. The domed gardens that Amazon has created at their HQ in Seattle are a strong example of employee-centric development. The Amazon gardens are not open to the public, though, which is not a direction the federal government should go in.	Marc Poling	5/7/2018	GSA - OPDQ

7	Planning	45	Coordinating Federal and Local Development Review Processes	Would suggest adding that the federal government should rethink how public space is used by and interacts with the public on or near federal property. Many facility managers may not even be aware that the property extending out toward the street from a facility is in fact public space. For decades the federal government has not done much to engage with the public in this space, but we must work with NCR localities to ensure that we do so moving forward.	Marc Poling	5/7/2018	GSA - OPDQ
8	Planning	NA	General	Please provide all of the images to be included in the Element for review before going final.	Marc Poling	5/7/2018	GSA - OPDQ
9	Historic Preservation			Set the stage for the L'Enfant Plan's formation of Washington's unique public open space (including within the rights-of-way of each street and avenue) by summarizing its extent and significance in the Introduction.	N. Witherell	5/7/2018	GSA - OPDQ
10	Historic Preservation			c)1 would read better as a continuation of c)	N. Witherell	5/7/2018	GSA - OPDQ
11	Historic Preservation	13		Commission has been supportive and how the protection could be improved.	N. Witherell	5/7/2018	GSA - OPDQ
12	Historic Preservation			For cultural resources, check that you are using NPS/National Register terms when characterizing resources and stating significance.	N. Witherell	5/7/2018	GSA - OPDQ
13	Historic Preservation			Check for accurate use of "viewshed" and "views." (Consider when "vistas" is a better choice for the latter.) Note examples of defined, significant viewsheds or vistas for clarity.	N. Witherell	5/7/2018	GSA - OPDQ
14	Historic Preservation	38		In discussion of siting and design of commemorative works: Take care in noting that commemorative works should be scaled to their site, since the text also advises against large-area works. Given the size and scale of the National Mall, be as prescriptive as possible for a Comp Plan element in discussing the policies.	N. Witherell	5/7/2018	GSA - OPDQ
15	Historic Preservation	7		Remove the words "sacred space" under "Balance Commemorative Works Within Parks". This is a casually tossed-off but inaccurate phrase and should not be part of the lexicon when describing a public commemorative work. This phrase also occurs in POS.E.1 and on Page 40, and perhaps elsewhere in the text.	N. Witherell	5/7/2018	GSA - OPDQ
16	Historic Preservation			Use "landscape design" rather than "landscaping" in most instances throughout this text.	N. Witherell	5/7/2018	GSA - OPDQ
17	Historic Preservation			GSA concurs with the policy statements on coordination among multiple landowners and jurisdictions; on balancing federal and local needs; and on programming goals for open space in different contexts.	N. Witherell	5/7/2018	GSA - OPDQ
18	Historic Preservation			Significant text edits are needed as the draft progresses.	N. Witherell	5/7/2018	GSA - OPDQ
19	Historic Preservation			Thank you for the opportunity to comment on this draft element.	N. Witherell	5/7/2018	GSA - OPDQ

**Smithsonian Institution Comments on Parks and Open Space Element  
5/10/18**

**General Comments**

Check document for correct spelling: Olmsted (page 14, fourth full paragraph) and McMillan

Please provide missing illustrations and captions for review, including:

- p. 4 chart showing Distribution of Parks and Open Space by Ownership
- p. 9 map of Rock Creek Park
- p. 15 images of designed landscapes from different eras

Please clarify if all sections are pertinent to all types of landscapes. If not, as seems to be the case, identify which landscape types should be guided by each section.

Please confirm SI's understanding that these guidelines are only applicable to projects subject to review by NCPC.

**Specific Comments**

Page 3. The Smithsonian is a trust instrumentality and not part of the federal government, and not an executive branch "agency". Consider separately noting SI with other federal entities including NGA and Kennedy Center that are not part of the government but that do have facilities that are in part federally supported. Indicate the applicability of this document to their open spaces if different than for government. For example, is NGA exempt from review of projects on its National Mall site? Is Kennedy Center at least partially within NPS jurisdiction?

Revise reference in para 3 to the federal government using open space as the setting of museums to avoid conveying the idea that Smithsonian museums are part of the government.

Bottom of page 3, revise per above re SI not a federal agency

Federal Parks & Open Space Land Management Status, Park System of the National Capital – correct discrepancy between SI lands on the Mall vs how NZP is designated on the map.

Page 5. Parks and Open Space Categories. The document refers to "historic designed landscapes" in POS.A.2. which is not defined here. The categories generalize designed landscape also as historic parks. If the Element wants to make the distinction of "historic designed landscapes" it should be defined in this section.

The description of "historic park" is defined following National Register of Historic Places criteria, but does not make the distinction if a "historic park" category requires listing in the DC Inventory or the NRHP to fit into this category. Please clarify. If NCPC wants this category to apply for landscapes and parks that aren't officially designated historic this distinction should be made. If non-designated landscapes are to apply to this category, is NCPC making the decision on what is "historic"? If so, this seems problematic, and should be left to the agency or entity to determine if their park/landscape is historic. The Element should encourage the agency/federal

entity to complete a Cultural Landscape Report or similar study to determine significance of more recent parks/landscapes.

Page 5. Definitions: NPS Guidelines for the Treatment of Cultural Landscapes, landscape terminology expands on the NCPC definitions and help further clarify NCPC's definitions. For example, should we utilize NPS terminology, which also discusses "component landscape" and the broader "cultural landscape" which encompasses "historic sites?" Referencing these terms could help to clarify intent but would require a re-read throughout the document as to where there might be further clarification behind NCPC's "designed landscapes" definition as well as on Page 13 and use of terms. At the very least, there should not be a contradiction or an overlap in definitions (i.e. historic park and cultural landscape definitions) – Could NCPC explain its thinking here?

Page 11. End of first paragraph: add - , *portions of* Smithsonian's National Zoo (the Rock Creek campus falls in the category of a historic designed landscapes as well as having component landscapes.)

Page 15. POS.A.8. The use of the phrase "exceptional representations" seems problematic, per the Page 5 previous comment. Is NCPC making the call on what is "exceptional"? The determination of what is "exceptional" or "historic" should be left to the agency/federal entity, and be based on study of the landscape/park (Cultural Landscape Report or similar). The ability to change landscapes and do modifications should not only be based off the region's design legacy but the impact of people and design that also function in a secure, safe and sustainable design for all.

Page 15, 16. POS.A.09, 10 and 12 – How does NCPC foresee these points becoming actionable? How would this language help in the evaluation of projects that are absent clear design guidelines or will a CLR or a set of guiding principles or design guidelines be suggestions for future projects? Language could have a strong positive trajectory but has a layer of subjectivity that will lend itself to a variety of interpretations.

Page 17-. Section B. Please clarify if the Element intends to separately classify urban parks/landscape under Section A, and that Section B is meant for naturalistic parks such as Rock Creek or Capper-Cramton. Cultural Resource description on page 21 is worded to limit to archaeological resources. Some of these Section B landscapes could contain more recent intact historic structures and may require additional language. And some of the Section A landscapes fall into Cultural Resources. Ensure that the stewardship guidelines listed in Section B (daylighting of streams, increasing urban tree canopy, protecting mature urban trees, planting of native plants) are balanced with the protection of design legacy and any modifications needed to respond to current uses, access, and maintenance requirements in these heavily used public spaces. Though aspirational, the stewardship opportunities may not all be appropriate for our iconic landscapes on the Mall. The guidelines for native planting, in particular, can be at odds with plant selection for interpretive purposes (the planting of edible plants in a Victory Garden or of African plants at an African art museum, etc).

Page 31 para 2. We suggest this paragraph be revised to delete reference to Smithsonian National Zoological Park or limit that reference to the portion of NZP that is north/east of Rock Creek and extending to Adams Mill and Kringle Roads. Or perhaps just choose a better example, particularly since some of the policies that follow are ones the Zoo would be limited in its ability to comply with for the park area south/west of Rock Creek.

That portion of the zoo is not a “publicly accessible open space” in the same sense as the National Mall or most of Rock Creek Park and although called a “park”, its main pedestrian artery of Olmsted Walk for pedestrians cannot always be open and connected to other pedestrian paths because this part of the zoo houses living collections and significant assets of various kinds that require restricted access when the zoo is not staffed to receive visitors and address safety issues. The Zoo is subject to accreditation by the AZA and many requirements for its open space design derive from AZA guidelines related to animal care and safety.

Page 33-Section D Parkways: If NPS has specific design standards, guidelines or regulations for projects adjacent to parkways under their jurisdiction, those could be referenced here.

Page 27-Section E Commemorative Works in Parks: Clarify if this section applies to all Commemorative Works or just those covered by the CWA that are also in a “park”. It seems to mainly address areas that are under NPS jurisdiction in the category of “parks”. We occasionally have commemorative sculptures in our gardens but these are not subject to the review process of NPS and GSA memorial projects. We don’t consider our sites other than the NZP to be in the category of “parks” so maybe that is enough to say?

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Comments from Local and Regional Agencies

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Office of the Director

May 14, 2018

Surina Singh, Urban Planner  
National Capital Planning Commission  
Policy and Research Division  
401 9th Street NW – Suite 500  
Washington, DC 29994

RE: NCPC Parks and Open Space Element

Dear Ms. Singh:

Thank you for the opportunity to comment on the National Capital Planning Commission's Federal Parks and Open Space Element. The Citywide Strategic Analysis Division and the Design Division of the District of Columbia Office of Planning (DCOP) worked together to provide unified comments on behalf of the agency.

The District government strives to ensure that the city's parks provide equitable access, great spaces, and world-class experiences. The Office of Planning recognizes the key role that parks play in recreation, aesthetics, equity, health and wellness, neighborhood character, environmental quality, and resilience. We also recognize the importance of coordination and shared stewardship between the District of Columbia and the federal government regarding park and open space planning, design, and management, to ensure better outcomes for District residents. These goals are reflected in our comments for the Federal Parks and Open Space Element, which are as follows:



Location	Proposed Modification
Pg. 3, 3 <sup>rd</sup> paragraph	Include something about federal parks in DC being unusual since many were created for and intended to be used as part of an urban park system. They are not stand-alone facilities.
Pg. 4, last paragraph	The last sentence is somewhat redundant with the prior sentence; could revise to read: “There are many challenges associated with balancing the national goals and interests of federal parks and open spaces with the demands of local needs; nevertheless, federal landowners must strive to effectively manage federal open space within their own regulatory limits while supporting the needs of local residents.”
Pg. 5, park categories	Natural Park is specifically called out, but active recreation is not listed under any of the “parks and landscapes” and needs to be added.
Pg. 5, greenways	Based on recent research, formal avenues/parkways that are part of the Highway Plan and connect large parks and open spaces should be identified (i.e.. Nebraska Avenue, South Dakota Avenue, Alabama Avenue, Minnesota Avenue, and Branch Avenue).
Pg. 6, Parks and Open Space Design Legacy	The Highway Plan is an influential plan that guided the growth of parks and parkways too and should be mentioned here. If NCPC needs their own study to recognize the Highway Plan, can assessing it be added as a policy?
Pg. 6, Natural and Cultural Resources	Recreation centers and design parks reflect historic trends in park design too and should be acknowledged as a cultural resource.
Pg. 6, Access and Connections	Highway Plan avenues and parkways could also be identified here.
Pg. 7, Balance Commemorative Works within Parks.	“Many memorials are located within urban parks that also function as <b>recreation facilities and</b> public gathering areas.”
Pg. 7 Balance Multiple Uses within Parks	I think there needs to be something about the opportunity for flood and heat island mitigation. Perhaps – “In addition to several dynamic uses such as public assembly, celebration, education, and recreation, parks and open space provide ecological and environmental benefits, <b>mitigate natural and man-made hazards</b> , serve as settings for commemorative works, and function as transportation and wildlife corridors.”
Pg. 7, Partnerships and Coordination and Pg. 42, Section F	The urban parks in DC are notable for opportunities for public private partnership that many urban park systems have, but atypical for NPS. This should be identified here.
Pg. 8, L’Enfant Era	Text should emphasize that the L’Enfant established the street network and open spaces that eventually became reservations. Plans, improvements, geometric designs, etc., to these spaces didn’t occur until after 1850. This reads as if the designs of these spaces are associated with L’Enfant.
Pg. 9, Civil War/Victorian Era	It is more accurate to say that the Highway Plan (1893-1898) extended several avenues of the L’Enfant plan. The plan had its own design

Location	Proposed Modification
	<p>principles that were distinct from the L’Enfant Plan and that has its own significant contribution to the city’s parks and open space system. Designs of reservations associated with the L’Enfant Plan should also be included as part of this era, the first attempts are coordinating improvements.</p>
Pg. 9, McMillan Era	<p>This description should also include something about improvements to the many reservations created as part of the L’Enfant and Highway plan. This era is notable for transferring jurisdiction of parks to the National Park Service, systematic approach to design of the reservations, and considering them as part of a coordinated system of urban open spaces along avenues.</p>
Pg. 11, 2 <sup>nd</sup> Paragraph	<p>Change reference to “highway system” to “freeway system” to avoid confusion with the Highway Plan.</p>
Pg. 11, The Legacy Era	<p>This should reference CapitalSpace, the first effort to consider the city’s parks and open spaces as one system in more than 30 years. Its referred to on page 27, but not here.</p>
Pg. 13	<p>Add a policy about the Federal government studying the Highway Plan (1893-98) to better understand it’s role in creating the park and open space system in DC.</p>
P. 14	<p>Misspelled “Olmsted”</p>
Pg. 17, Section B and pg. 27, Section C	<p>Include something about the District’s plans for Buzzard Point and the Riverwalk. The plan includes recommendations for a resilient shoreline and a linear park space that needs to be coordinated with NPS, Fort McNair, and S. Capitol Bridge. Design guidelines for the Riverwalk reinforce the importance of a natural shoreline and aesthetic and access to the water. This may be appropriate to discuss on other sections too. This area is redeveloping rapidly.</p>
Pg. 19 Waterways	<p>Seawalls are deteriorating in large sections of the city – could describe their replacement with vegetated natural shorelines.</p>
P g. 24 POS.B.11	<p>Could include text about how permeable surfaces should be encouraged.</p>
Pg. 28 First paragraph	<p>Include language acknowledging that there is the opportunity to work with local partners to better use small federally-controlled open spaces, such as triangle parks, for recreational, ecological, and commemorative uses.</p>
Pg. 32	<p>Include a policy about coordinating the development of parks and trails with District agencies and private sector (thinking specifically of Buzzard Point and Fort McNair).</p>
Pg. 33, Section D, first paragraph	<p>Acknowledge that many federal parks were created as part of an urban parks and recreation system for the District of Columbia and the challenges with balancing federal needs and local uses.</p>

Location	Proposed Modification
Pg. 33, Balancing Competing Uses . . .	Include “recreation facilities” in the list of “variety of parks and open spaces”. For example, soccer leagues at Carter Barron, playground at Lincoln Square, etc.

We look forward to continued engagement on the Federal Elements of the Comprehensive Plan. Should you have any questions, please contact Stephen Gyor, Lead Sustainability Planner, at [stephen.gyor@dc.gov](mailto:stephen.gyor@dc.gov) or 202-741-5243.

Sincerely,



Eric D. Shaw

Cc: Brian Kenner, Deputy Mayor for Planning and Economic Development  
Marcel Acosta, Executive Director, National Capital Planning Commission  
Keith A. Anderson, Director, DC Department of Parks and Recreation

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Department of Energy and Environment



**MEMORANDUM**

**TO:** National Capital Planning Commission

**FROM:** Julienne Bautista  
Environmental Engineer  
Regulatory Review Division, Natural Resources Division

**DATE:** May 7, 2018

**SUBJECT:** Parks and Open Space Element Update – Agency Comments

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The Natural Resources Administration within the Department of Energy and Environment (DOEE) are providing the following comments to the Parks and Open Space Element Update by the National Capital Planning Commission (NCPC). We value the opportunity to work with our federal partners in ensuring the enhancement of our regional parks and open space areas for the residents of the District of Columbia and surrounding metropolitan areas.

General Comments

We would like to encourage the commission to provide guidance on project review when policy conflicts arise. We would like to know if there's a possible decision making process between policy initiatives - for example, historical preservation at the cost of environmental degradation or endangerment due to storm surge possibilities.

Specific Comments

Under the guiding principle, Provide Stewardship of Natural and Cultural Resources, POS B.2 uses the following phrase “The federal government should” suggesting the protection floodplains in particular. While this is good, it is lumped with other things and the language on floodplains could be stronger and reflect what DOEE is aiming to do in our revised floodplain with DC owned parkland within the 100-yr floodplain – that is prohibit new construction with parkland in the 100-year floodplain with minor exceptions (see below from floodplain regulations draft for reference).

*DRAFT District Regulation*

*3113.2 New construction is prohibited on District Government parkland that is in the 100-year floodplain upstream of the backwater area, as indicated on the water surface elevation profiles in the FIS, with these exceptions:*

- (a) Park amenities that help educate the public about park resources; and*
- (b) Functionally dependent facilities.*

This will require language to carve out the relatively frequent exception of when congress passes an act instructing the National Park Service to build a monument in the floodplain.

Language, guidance or action items will make it more difficult to add any new development on or sell to developers any federal parkland/open space (or transfer property to District government to sell to developers) within the 100-year (or even 500-year) floodplain would be welcome here.

Under the guiding principle, Balance Multiple Uses within Park, we would like to recommend adding environmental benefits as uses, such as stormwater management and natural flooding control methods. By doing this, the policy guidance will ensure that adaptive design elements are covered throughout the Element Update.

Should you have any questions regarding these comments, please call me at (202) 299-3345 or email at [julienne.bautista@dc.gov](mailto:julienne.bautista@dc.gov).



Larry Hogan, Governor  
Boyd Rutherford, Lt. Governor

Robert S. McCord, Acting Secretary

April 26, 2018

Ms. Surina Singh  
Parks & Open Space Public Comment  
National Capital Planning Commission  
401 9th Street, NW - Suite 500  
Washington, DC 20004

**STATE CLEARINGHOUSE RECOMMENDATION**

**State Application Identifier:** MD20180309-0163

**Applicant:** National Capital Planning Commission

**Project Description:** The National Capital Planning Commission's Draft of the Parks and Open Space Element of the Comprehensive Plan for the National Capital

**Project Location:** County(ies) of Montgomery and Prince George's; and the District of Columbia

**Approving Authority:** National Capital Planning Commission NCPC

**Recommendation:** Consistent with Qualifying Comments

Dear Ms. Singh:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 34.02.01.04-.06, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter constitutes the State process review and recommendation. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Department(s) of Natural Resources, Transportation, the Environment; Montgomery County, Prince George's County; and the Maryland Department of Planning, including the Maryland Historical Trust. As of this date, the Maryland Department(s) of Natural Resources, Transportation; Montgomery County, and Prince George's County have not submitted comments.

The Maryland Department of Planning, including the Maryland Historical Trust found this project to be consistent with their plans, programs, and objectives.

Our Department (Planning) noted that "the draft plan is consistent with our programs and policies."

The Maryland Historical Trust has determined that the project will have "no effect" on historic properties and that the federal and/or State historic preservation requirements have been met.

Ms. Surina Singh

April 26, 2018

Page 2

State Application Identifier: **MD20180309-0163**

The Maryland Department of Environment (MDE) found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments summarized below.

1. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Waste Diversion and Utilization Program at (410) 537-3314 for additional information regarding recycling activities.
2. The Waste Diversion and Utilization Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
3. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.

**Any statement of consideration given to the comments should be submitted to the approving authority, with a copy to the State Clearinghouse.** The State Application Identifier Number must be placed on any correspondence pertaining to this project. The State Clearinghouse must be kept informed if the approving authority cannot accommodate the recommendation.

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at [myra.barnes@maryland.gov](mailto:myra.barnes@maryland.gov). **Also, please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. Any substitutions of this form must include the State Application Identifier Number. This will ensure that our files are complete.**

Thank you for your cooperation with the MIRC process.

Sincerely,



Myra Barnes, Lead Clearinghouse Coordinator

MB:MB  
Enclosure(s)

cc: Tina Quinichette - MDOT  
Amanda Degen - MDE

Greg Golden - DNR  
Kathleen Herbert - PGEO

Greg Ossont - MTGM  
Dan Rosen - MDPI-R

Joseph Griffiths - MDPL  
Beth Cole - MHT

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Larry Hogan, Governor  
Boyd Rutherford, Lt. Governor

Robert S. McCord, Acting Secretary

**PROJECT STATUS FORM**

Please complete this form and return it to the State Clearinghouse upon receipt of notification that the project has been approved or not approved by the approving authority.

**TO:** Maryland State Clearinghouse  
Maryland Department of Planning  
301 West Preston Street  
Room 1104  
Baltimore, MD 21201-2305

**DATE:** \_\_\_\_\_  
(Please fill in the date form completed)

**FROM:** \_\_\_\_\_  
(Name of person completing this form.)

**PHONE:** \_\_\_\_\_  
(Area Code & Phone number)

**RE: State Application Identifier: MD20180309-0163**  
**Project Description:** The National Capital Planning Commission's Draft of the Parks and Open Space Element of the Comprehensive Plan for the National Capital

<b>PROJECT APPROVAL</b>			
This project/plan was:	<input type="checkbox"/> Approved	<input type="checkbox"/> Approved with Modification	<input type="checkbox"/> Disapproved
Name of Approving Authority:			Date Approved:
_____			_____

<b>FUNDING APPROVAL</b>			
<i>The funding (if applicable) has been approved for the period of:</i>			
_____, 201__ to _____, 201__ as follows:			
Federal \$:	Local \$:	State \$:	Other \$:
_____	_____	_____	_____

<b>OTHER</b>	
<input type="checkbox"/>	Further comment or explanation is attached



May 7, 2018

Sunia Singh, RLA, LEED-AP  
National Capital Planning Commission  
Policy and Research Division  
401 9<sup>th</sup> Street, NW Suite 500  
Washington, DC 20004  
[surina.singh@ncpc.gov](mailto:surina.singh@ncpc.gov)

Dear Ms. Singh:

On behalf of Arlington County, I am pleased to comment on the National Capital Planning Commission Update: Federal Parks & Open Space Element. As an urbanized county and as a close neighbor, your Goal Statement “to protect and enhance the National Capital Region’s parks and open space system while providing ecological, social, and educational benefits for visitors, residents, workers, and future generations” is laudable. In review of the Parks and Open Space Element, Arlington especially agrees with the Guiding Principle in Section F: Build Partnerships and Coordination among Multiple Landowners and Jurisdictions. To that end, the coordination of federal agencies, including NCPC on the Arlington Courthouse Square Study, as referenced on page 44 of the element was an important step in that study and Arlington anticipates similar coordination in the future.

In further review of the Summary of Modifications to Policies, several policies are of specific interest to Arlington, including:

12. Provide Access to and Connection between Parks and Open Space.  
POS.C.3 Create access points to the region’s park system from adjacent communities where impacts on natural and cultural resources will be minimal.
  
18. Balance Multiple Uses within Parks  
POS.D7 Develop waterfront parks that accommodate multiple uses and programming opportunities while enhancing the resilience and natural features of the waterfront.  
*(The waterfront aspect is of special interest to Arlington as it works with the National Park Service on a possible Boathouse located on the Arlington side of the Potomac River)*
  
28. Build Partnerships and Coordination among Multiple Landowners and Jurisdictions  
POS.F.4 Balance the national significance of parks with federal and local interests and the need to accommodate a range of uses and events.
  
29. Build Partnerships and Coordination among Multiple Landowners and Jurisdictions

POS.F.6 Develop federal and local collaborative relationships to maximize the functionality of small parks as local neighborhood amenities.

Arlington County is also in the process of updating the Arlington County 2005 Public Spaces Master Plan (PSMP), an element of the Arlington County Comprehensive Plan. The current study process is entitled “POPS: A Plan for our Places and Spaces” and more information can be found through this link: <https://projects.arlingtonva.us/public-spaces-master-plan-psmp-update/>.

The purpose of the PSMP Update is to assess various aspects of Arlington’s public space system and provide strategies for the future of the full breadth of public spaces, including all of the parks, natural resource and recreational needs that make up that system. A revised draft is expected late spring 2018.

The County’s current planning documents make several recommendations related to federally owned land and facilities. The Public Spaces Master Plan adopted by the Arlington County Board in 2005 includes many such references and can be found through this link: <https://projects.arlingtonva.us/plans-studies/comprehensive-plan/public-spaces-master-plan/>

Please note the specific references listed below:

- “Develop a boathouse facility, to be located between Theodore Roosevelt Island/Little River and Francis Scott Key Memorial Bridge.” Recommendation from the Arlington County 2005 Public Spaces Master Plan (PSMP), Recommendation 1.8 – Ensure River Access, page 46.
- “Collaborate with the National Park Service to develop a master plan for Roaches Run and Gravelly Point.” Recommendation from the Arlington County 2005 Public Spaces Master Plan (PSMP), Recommendation 1.8 – Ensure River Access, page 46.
- “Collaborate with the National Park Service to maintain and improve existing trail access along the Donaldson Run, Pimmit Run, Gulf Branch, and Windy Run streams, including improved maintenance, erosion control, control of invasive species, signage and trail markers.” Recommendation from the Arlington County 2005 Public Spaces Master Plan (PSMP), Recommendation 1.8 – Ensure River Access, pages 46-47.
- Improve access to the Potomac Heritage Trail, develop signage to draw attention to access points, and install trail markers. This recommendation will be included in the draft Public Spaces Master Plan, to be shared for public input later this year.
- Affirm support for the planned bridge across the George Washington Memorial Parkway, connecting Long Bridge Park to the Mount Vernon Trail. This is referenced in the [2004 Long Bridge Park Master Plan](#) on pages 10, 12, 19, 21, and 25. Also referenced in the National Park Service [Gravelly Point and Roaches Run Environmental Assessment](#) – (although never completed) and the August 2016 [Paved Trail Study](#), that lists this connection as a priority.

We would ask that you take these references into consideration as you move forward towards adoption and implementation of the Parks and Open Space Element.

Thank you again for the opportunity to comment on this project.

Sincerely

A handwritten signature in black ink, appearing to read 'Robert J. Duffy', written over a horizontal line.

Robert J. Duffy, FAICP, Planning Director

CC: Claude Williamson, Director, Department of Community Planning, Housing and Development (CPHD)  
Jane Rudolph, Director, Arlington Department of Parks and Recreation, (DPR)  
Jennifer Smith, Comprehensive Planning Supervisor, CPHD  
Kris Krider, Urban Design and Research Planning Supervisor, CPHD  
Samia Byrd, Assistant County Manager, County Managers Office, (CMO)  
Tim Aiken, Federal Liaison, CMO  
Leon Vignes, Associate Planner, CPHD

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## Comments from Interest Groups

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# The Committee of 100 on the Federal City



www.committeeof100.net

*Founded 1923*

May 7, 2018

**Chair**

Stephen A. Hansen

Marcel C. Acosta, AICP  
Executive Director

**Vice-Chair**

Meg Maguire

National Capital Planning Commission  
401 9th Street, N.W., North Lobby, Suite 500  
Washington, D.C. 20004

**Secretary**

Erik Hein

**Treasurer**

Carol F. Aten

Subject: Comprehensive Plan for the National Capital: Federal Elements -  
Parks & Open Space Element

**Trustees**

Charlie Bien

Judy Chesser

George Clark

Monte Edwards

Larry Hargrove

Kathy Henderson

Kate Montague Perry

Elizabeth Purcell

Laura M. Richards, Esq.

Marilyn Simon

Jim Smailes

Pat Tiller

Kirby Vining

Evelyn Wrin

Dear Mr. Acosta:

The Committee of 100 on the Federal City (C100), founded in 1923, is the District of Columbia's oldest citizen planning organization. C100 has long been concerned with protecting and enhancing, in our time, the various elements of the L'Enfant Plan (1791-92) and the planning and design work of the McMillan Commission (1901-02) and now carrying forward in the 21st Century appropriate plans and projects to continue to enhance Washington, D.C., our national capital city, the home of Washington residents, and the center of the National Capital Region.

The Comprehensive Plan for the National Capital, composed of Federal Elements and District Elements, is the basic guide in shaping the future development of Washington, D.C. C100 appreciates the work that the National Capital Planning Commission, both staff and Commission members, have invested in preparing this Element. On March 1, 2018, the National Capital Planning Commission (NCPC or Commission) authorized the Parks & Open Space Element of the Comprehensive Plan for the National Capital: Federal Elements to be released for a 60-day public comment period. We understand that after the review period is completed, NCPC staff will make any revisions they believe are needed and bring a revised final draft back to the Commission.

945 G Street, N.W.  
Washington, D.C. 20001  
202.681.0225

[info@committeeof100.net](mailto:info@committeeof100.net)

We like the new organizational structure, the key principles, the discussion of designed landscapes, and the categorizations of different types of parks and open space with associated policies. We also applaud the emphasis on

protection of the L'Enfant Plan, McMillan Plan, and viewsheds. The discussion is intelligent and thorough and the policies will be helpful as criteria in helping the Commission make recommendations and decisions on proposed projects.

We have two major and somewhat related concerns:

1. We are dismayed by the lack of specifics, i.e., any plans or objectives relating to specific park and open space needs or issues. The current (2004) version of the Element by contrast identifies specific areas for more acquisition, trails to be completed, etc. It is more aspirational and concrete. In fact, not everything in the 2004 Element has been completed and those that are still relevant should be brought forward. We assume that there are a number of specific projects contained in the various plans cited that could appropriately be identified in this Element.

In addition, where there are current known issues in play like the proposal to develop the C&O Canal in Georgetown in ways that would seriously damage its historic resources and character and like the road along the west bank of the Anacostia River proposed by DDOT and Events DC. See Figure 1. The Element should address these specific areas and desired outcomes in the context of the policies.

Several plans have called for a continuous pathway along the rivers from Georgetown to the National Arboretum. There are currently gaps in that pathway. The Element should make a statement about completing the pathway and filling the gaps in what we call “the Washington Waterfront Walk,” as discussed below.

2. The revised “goal statement” (p. 3) to “protect and enhance the parks and open space system” does not include an important concept in the 2004 Element i.e., “ensure that adequate resources are available for future generations.” And the guiding principles have a “static” quality—protection and utilization of existing parks and open space but missing the goal to “enhance” what we have through the designation, acquisition, and protection of more parks and open space. While the total amounts of parks and open space may look impressive in the aggregate, the city's population will grow and today there are still unmet needs, particularly for mid-size parks, as noted in the CapitalSpace report (2010):

Overall, while parks are distributed uniformly across the city, some sections of the city have limited walkable access to a large park site, particularly in the upper north-central, Mid-City, and Capitol Hill. ...

The most common type of park in Washington is less than one acre in size. ... more than 70 percent fall into this category. Mid-sized parks, between 5 and 50 acres, account for only 16 percent of the city's total parkland. They include parks like Meridian Hill, Fort Reno, Lincoln, Langdon, and Banneker. Eighty percent of the city's parkland is found in large parks that are greater than 50 acres in size (green dots) such as Rock Creek Park, Anacostia Park, East Potomac Park, the National Mall, and many of the Fort Circle Parks. (pp. 26, 28)

There is already an appalling lack of parks and open space in rapidly developing areas like NoMA. Ward 6 has less waterfront parkland than any other Ward that borders a river. (See Figure 2.) And now we are going to redevelop Franklin Square to include a

playground because of the city's lack of initiative and foresight in setting aside or acquiring additional land for parks and open space as we expand residential development in downtown areas of DC.

Another desirable policy that would that would “protect and enhance” relates to preserving and protecting our remaining open waterfronts. One of the amendments that the C100 proposed in the current amendment cycle for the DC elements of the Comprehensive Plan was a limitation on new development or redevelopment within a minimum of 600 feet of the Anacostia River and Potomac River shorelines. This limitation should also be included in the Federal Element. Our proposal is based on the need to preserve currently open shoreline for public access and view (once it is developed, it is generally lost forever), as well as the recent floodplain studies by the DC Department of Energy and Environment and the prospect of sea level rise in the face of climate change. This should be a key part of any effort to make Washington, DC a more resilient city. Shorelines are an important asset to our nation's capital and have significant environmental benefits.

We strongly object to any reference in the narrative suggesting that the Wharf on the Southwest waterfront is a waterfront park (see page 19). The Wharf is a major waterfront mixed-use development that incorporates some plazas, walkways, docks, a park, and other open spaces, but it should not be classified as a waterfront park. And while there is a Georgetown Waterfront Park, neither would we want to see it suggested that the adjacent Washington Harbour development is a waterfront park.

In addition to these larger issues, we have a number of more specific comments and questions:

**Parks and Open Space Categories: Natural Parks (p. 5)**

Under the definition of “natural park”, we recommend deleting “regional development” which seems counter to protecting a natural area. In fact, on page 6 under “Provide Stewardship of Natural and Cultural Resources,” “regional development” is described as a “challenge” faced by parks and open space. In the same section on page 6, it says that “the federal government has an important role in managing and **protecting** the natural and cultural features of the region for future generations.” [emphasis added]

The term “Conservation areas” is introduced as one of the elements of Natural Parks. Conservation in the context of planning for the future of parks and open spaces is the practice of caring for the Earth's natural resources so all living things can benefit from them now and in the future. Conservation is the underlying requirement for parks and open space planning, but it does not appear later in the document. “Conserve” in the 2004 Element has been replaced by “protect” in the current draft, but both have an important role. At a minimum the concept of conservation should be included in the “Guiding Principles” (p. 7).

**Section A. Protect the Parks and Open Space Design Legacy**

POS.A.3 (page 13) should make clear that both axes of the National Mall should be protected and maintained, not just the “cross-axis” which we take to mean the north-south piece. The 2004 Element does refer to both axes. Also, as a general comment, the

National Mall seems to get rather short shrift in the element, and we recommend some additional attention be paid to the National Mall and Monumental Core in the narrative. POS.A.4 should be amended to include “historic” as one of the values of historic parks. Even though they are referred to as historic parks, their historic value should be specifically noted along with their possible architectural and landscape values.

### **Civil War Defenses**

The first sentence of the second full paragraph on page 14 describes these as “open spaces along the rim of the L’Enfant City.” This is a misleading description. The Civil War Defenses of Washington is a network of green open spaces where the forts were located (some portions of the forts still remain in some cases). The forts are connected in part by a band of parks and trails. On the north side of the city, the forts were located approximately 2-4 miles north of the northern edge of the L’Enfant Plan city boundaries. Constructed during the Civil War to protect the nation’s capital, the forts stretch over a distance of 37 miles in Washington and Virginia (Arlington County and Alexandria) in a great “circle” around the original City of Washington. Therefore, many of them are in areas beyond the rim. At the bottom of page 30 and top of page 31, there is a more accurate description of the Fort Circle Parks but a puzzling statement that suggests that many of the Civil War forts are located in Rock Creek Park which is not the case. Some rewording is needed in both cases.

### **Adapting designed landscapes (pp. 14-15)**

This section contains the statement: “**At times, there will be a need to modify designed landscapes to meet new programmatic goals and infrastructure needs;** accommodate changes in the surrounding area; and/or alter elements from different design periods or add new elements to the landscape. These modifications should be balanced in a way that contributes to the region’s design legacy.” [emphasis added] Where the landscapes at issue involve parks and open spaces, the priorities should be reversed; the objective should be to adopt or modify development and infrastructure needs to respect the public spaces.

POS.A.8 through POS.A.12 (pp. 15-16) address the need to recognize the value and intent of parks and open space landscapes and maintain a sense of historic continuity and balance those values when making adaptations or improvements to designed landscapes. These points need to include the concept of “conservation.”

### **Section B: Provide Stewardship of Natural and Cultural Resources (pp.17-18)**

Subpart a) The text describes terrain features that contribute to the region’s natural landscape and provides examples of specific terrain features. The examples should include “the Anacostia River and its shorelines.”

Subpart b) states that a greenway system provides natural buffers that improve water quality ...” and on page 19 provides specific examples of greenways but there is no mention of the Anacostia River greenway. The examples should include the Anacostia River greenway.

### **Greenways (p. 18)**

We agree on the importance of greenways and wonder if the wildlife migration corridors have been mapped to show connections and gaps. This mapping is vital in planning to protect and maintain greenways. If maps already exist, the Element should display them and set a goal of closing the gaps. If there are currently no maps, the Element should set a goal to create maps and to close the gaps and POS.B.3 should be amended as follows:

POS. B.3 Protect and maintain greenways for their environmental benefits and as natural and cultural resources. **Map greenways, identify any gaps in greenways, and set a goal to close those gaps.** [suggested changes in bold]

#### **Waterways (p. 19)**

Page 19 contains the statement: "The rivers often overflow their banks during high tide, covering adjacent paths with water. This presents opportunities for the federal government to improve water quality, providing for access, resilience, and recreational opportunities." The statements in both sentences are correct, but something seems to be missing to connect the "opportunities" described in the second sentence to the "flooding" statement in the first sentence.

#### **Stewardship Opportunities (pp. 21-25)**

##### **Preservation of waterfront open space**

As a result of the magnificent stewardship by the National Park Service (NPS), incredible natural resources of waterfront and open space have been preserved in the District of Columbia. NPS has been able to prevent private development of these lands through its ownership/control of these public lands in the District, including both shores of the Anacostia River waterfront and large sections of the Potomac River waterfront and much of the land adjacent. Once waterfront land is used for private residential, commercial or institutional uses, it will be lost forever as a valuable natural resource capable of being enjoyed by all. There should be no further transfer of federal park land to the District of Columbia government. The District has been a poor steward of land transferred from the federal government. After the District obtained title to Reservation 13 (DC General campus), it did adopt a master plan and zoning through a public process, but then ignored its own rules and offered the property for a Redskins training center and more recently, for Amazon's HQ2.<sup>1</sup> After acquiring historic Boathouse Row on the Anacostia River in 2008, the District advocated pushing city streets through a sensitive natural resource area. DC's planning has failed to take care of the needs of current residents, as opposed to Deputy Mayor for Planning and Economic Development's focus on development and raising the tax base. DC needs to give the people who live here access to parks and open space and preserve, protect and enhance those spaces. Based on the District's poor track record, we urge that no additional federal park land be transferred to the District, and NPS's stewardship of these lands be continued. We suggest adding new POS.B.19 on page 25:

**POS. B. 19 The National Park Service should continue to own/control and preserve all of the open space, including the Stadium Armory area, along both**

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<sup>1</sup> Jonathan O'Donnell, "D.C.'s pitch to Amazon focuses on 4 hot neighborhoods," *Washington Post*, 17 Oct. 2017, A-14.

**shores of the Anacostia and under no circumstance should any non-park or non-water dependent use be permitted within 600 feet of the Anacostia River highwater mark.** [suggested changes in bold]

To implement the Anacostia Waterfront Initiative, the third full paragraph on p. 23 notes the goal to improve the river's water quality, and in the last sentence refers to "environmental guidelines for future development along the Anacostia waterfront." This reference should be changed to read, "protecting and maintaining parkland for water-dependent uses."

### **Minimizing effects of light pollution on wildlife (p. 22)**

The Federal Environment Element does not specifically address the effects of light pollution on wildlife. (pp. 18, 20) We suggest that the Parks & Open Space Element add goals to reduce light pollution. Light pollution not only causes bird collisions with buildings, it attracts birds into urban areas and away from forested areas with more abundant food sources. In January 2018, American Bird Conservancy's collisions@lists.abcbirds.org noted:

Recent papers ... now confirm what has long been surmised: urban glow attracts birds towards the built environment. This applies primarily to migrating songbirds, found in unexpectedly high densities in areas lit at night. These birds are not circling and crashing into buildings, but as they stop over in these areas, they are vulnerable to collisions with glass, predation by cats and other unintended consequences of urban life. [emphasis added]

Most birds migrate at night through increasingly light-polluted skies. Bright light sources can attract airborne migrants and lead to collisions with structures, but might also influence selection of migratory stopover habitat and thereby acquisition of food resources. We demonstrate, using multi-year weather radar measurements of nocturnal migrants across the northeastern U.S., that autumnal migrant stopover density increased at regional scales with proximity to the brightest areas, but decreased within a few kilometers of brightly-lit sources. This finding implies broad-scale attraction to artificial light while airborne, impeding selection for extensive forest habitat. Given that high-quality stopover habitat is critical to successful migration, and hindrances during migration can decrease fitness, artificial lights present a potentially heightened conservation concern for migratory bird populations.<sup>2</sup> [emphasis added]

DOEE's Wildlife Action Plan (2015) states:

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<sup>2</sup> McLaren, J. D., Buler, J. J., Schreckengost, T., Smolinsky, J. A., Boone, M., Emiel van Loon, E., Dawson, D. K. and Walters, E. L. (2018). Artificial light at night confounds broad-scale habitat use by migrating birds. *Ecol Lett.* doi:10.1111/ele.12902.

**Light Pollution** – The use of street lights and other sources of direct and ambient light throughout the District have the potential of being a disturbance for nocturnal and crepuscular wildlife. Bright lights can disorient and become a source of mortality for migratory birds, bats, and some invertebrates. Ch. 4, p. 112.

See also scientific studies on light pollution's effects on wildlife (mammals, amphibians, invertebrates ) from International Dark-Sky Association's Artificial Light at Night (ALAN) Research Literature Database, [www.darksky.org](http://www.darksky.org).

To insure that the lighting satisfies the most rigorous dark sky standards, we suggest that the Element specify that all new and replacement lighting fixtures on federal buildings and all lighting on federal property meet the standards for a seal of approval from the International Dark-Sky Association (IDA). Fixtures approved by IDA employ warm-toned (3000 K or lower) white light sources or employ amber light sources or filtered LED light sources, are full-shielded, emit no light above the horizontal plane, have no sag or drop lenses, side light panels, or uplight panels, etc. For this reason we suggest a new POS.B.19:

**POS.B.19 Minimize light pollutions by requiring that all new and replacement lighting fixtures on federal buildings meet the standards for a seal of approval from the International Dark-Sky Association.** [suggested changes in bold]

#### **Roads** (p. 22)

The Element calls for protecting ecologically sensitive areas from the impacts of development. DC Department of Transportation has suggested building a commuter road (the "Park Drive") through a natural habitat area in federal parkland along the west side of the Anacostia River from Benning Road to Barney Circle.<sup>3</sup> (see Figure 1) In the past, Events DC also included this road in its development plans.<sup>4</sup> There is no need for this road—it would be a barrier to pedestrian access to the Anacostia shoreline, and further, all roads are a danger to wildlife.<sup>5</sup> New or expanded roads should only be built if there is a compelling reason and no other alternative, especially in riparian areas. For these reasons, we suggest a change to POS.B. 11 on p. 24:

POS.B.11 Discourage **new or expanded roads** and paved parking areas along the shoreline of rivers, streams, and at waterfront parks. Remove existing **roads and** parking when feasible and restore those areas to a landscaped condition, which could include recreational uses. [suggested changes in bold]

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<sup>3</sup> See DDOT, Middle Anacostia Crossings Study (2005).

<sup>4</sup> <https://www.rfkcampus.com/> At a public meeting on April 30, 2018, EventsDC announced that its revised access road will intersect with an existing curb cut on Oklahoma Avenue, run west away from the river, until it intersects with the river near the East Capitol Street Bridge. It is unclear whether EventsDC plans another road south of the East Capitol Street Bridge.

<sup>5</sup> DOEE, Wildlife Action Plan, (2015), p. 95. Table 16 IUCN Hierarchy of Conservation Threats and TRACS Action Drivers in the District.

A minimum of 600 feet landward from the Anacostia's high-water mark should be preserved as open space and for water-dependent recreational uses. We should not allow future development to block the visual or physical access for all citizens, both now and into the future. (Six hundred feet is roughly the same as the long side of many blocks in an urban grid pattern, including the public right away on both ends of the block.) Please note there are many areas where open space of far more than 600 feet is needed. But nowhere should there be less than 600 feet. Therefore, only water-dependent open space uses should be allowed within the 600 feet area. Such uses include areas for picnicking and water-related recreational uses such as fishing and boating. And who knows, maybe in the future, if the cleanup of the Anacostia continues, there may be beaches for swimmers to soak up the sun. Non-water dependent uses should be prohibited within the 600-foot areas. A few of such uses include residential and commercial (including offices) and non-water dependent sport areas and parking lots and highway and industrial uses. For these reasons, we suggest adding a new POS.B.20 on page 25:

**POS.B.20 Under no circumstance should any non-park or non-water dependent use be permitted within 600 feet of the Anacostia River high-water mark.** [suggested changes in bold]

#### **Responsible Practices to Protect Natural and Cultural Resources** (pp. 25-26).

We agree that the threat from invasive species must be addressed. "Invasive plant and animal species are the greatest threat to both terrestrial and aquatic habitat types within the District." DOEE Wildlife Action Plan (2015), 98-99, 101, 103.<sup>6</sup> While it is important to engage the public in appreciating and protecting open space, the federal government must take a leadership role. For this reason, we suggest the following change in POS.B.21 on p. 26:

POS.B.21 **Lead the effort** in the cleanup, planting, removal of invasive species, and maintenance of the region's rivers, trails, parks and open space. Consider opportunities to educate and engage communities **in this effort.** [suggested changes in bold]

#### **C&O Canal**

The Chesapeake and Ohio Canal (C&O Canal) restoration project is planned to improve access, address infrastructure needs, including safety and accessibility of the towpath. As we pointed out in our comments filed January 5, 2018 under NEPA and section 106 of the National Historic Preservation Act, the concept plan presented in November 2017 raises significant issues under both statutes.<sup>7</sup>

##### NEPA

The C&O Canal concept plan offers excellent ideas, including refilling the canal, restarting canal boat rides, adding a new visitor center, improved signage, and grading the

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<sup>6</sup> The Federal Environment Element (2016) indicates that it is important for the federal government as a guide for conservation and preservation of wildlife habitat in future development and actions. p. 18.

<sup>7</sup> C100's comments on the C&O Canal, submitted on January 5, 2017 (two letters) should be posted soon on NPS's PEPC website.

towpath for safety. However, the canal has endured repeated and severe floods, scouring the canal and damaging its structure. Therefore, for the concept plan to succeed, every alternative selected must be sustainable, able to withstand flooding. For example, flood-vulnerable alternatives such as boardwalks, elevators, new flower beds, and alternatives B and C for the towpath should be re-evaluated. NPS states that the canal floods approximately every 10 years most recently in 2010. Climate change, rising river levels, and more frequent extreme rain events will combine to make future canal floods more severe.<sup>8</sup>

### Section 106

The canal is a remarkable survival of our early Republic's and the national capital's industrial story. Though much changed in places, it is, by nature, industrial and gritty. Many of the concept plan's proposals seek to inappropriately obliterate, tame, "improve on," or redefine the very industrial character that the U.S. Congress mandated preserved for future generations as a unit of the National Park System. This is neither good historic preservation management nor approved management practices for a unit of the National Park System.

### **Section C: Provide Access to and Connections between Parks and Open Space**

The 2004 Element included the objective of linking the Fort Circle Parks with a trail. This seems to have dropped out of the current draft. The specific objective and the objective to fill the gaps in the waterfront walk from Georgetown to the National Arboretum should be specifically noted under the "Federal Open Spaces" section. POS.C.4 or POS.C.7 should include language about filling in the existing gaps. POS.C.9 talks about linking the Civil War Defense sites with surrounding communities but not with each other. Creating a continuous trail linking the historic fort sites should be specifically included.

For the reasons set forth above concerning the need for a 600-foot set back on the waterfront, , we recommend adding a new POS.C.11:

**POS.C.11: On NPS-controlled property, no non-park or non-water dependent use is permitted within 600 feet of the Anacostia high water mark.**  
[suggested changes in bold]

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<sup>8</sup> National Oceanic and Atmospheric Administration (NOAA), *Adapting to Climate Change: A Planning Guide for State Coastal Managers*, (Silver Spring, Md.: NOAA Office of Ocean and Coastal Resource Management: 2010), [noaa.gov/climate/adaptation.html](http://noaa.gov/climate/adaptation.html). United States Geological Survey (USGS), *The Chesapeake Bay: Geologic Product of Rising Sea Level* (Reston, Va: USGS, 1998), <http://pubs.usgs.gov/fs/fs102-98/>. Svetlana Jevrejeva et al., "Coastal sea level rise with warming above 2°C," *Proceedings of the National Academy of Sciences*, [www.pnas.org/cgi/doi/10.1073/pnas.1605312113](http://www.pnas.org/cgi/doi/10.1073/pnas.1605312113). National Aeronautics and Space Administration, "Adapting to a Changing Climate: Federal Agencies in the Washington, DC Metro Area," (2012) [www.mwcog.org](http://www.mwcog.org). Internet; accessed 13 Nov. 2016. Authorities cited in DOEE, *Wildlife Action Plan*, 114-117 (2015). Elizabeth Kolbert, "The Siege of Miami," *The New Yorker*, Dec. 21 and 28 (2015), 42-50, 42. NOAA, William Sweet, et al., "Sea Level Rise and Nuisance Flood Frequency Changes Around the United States." NOAA Technical Report NOS CO-OPS 073, vi (2014). DOEE, "Climate Ready DC," 2-3. DOEE, "Vulnerability & Risk Assessment," 19. Kelsey Robertson, "Resilient History: Protecting Chesapeake Bay Coastal Historic Districts from Rising Seas Through Adaptive Planning," Thesis, Masters of Professional Studies in Urban & Regional Planning, Georgetown University (2016).

## **Trails (pp. 29-31)**

### Washington Waterfront Walk

NCPC's *Extending the Legacy Plan* (1997) called for an 11-mile waterfront walk from Georgetown to the National Arboretum, encompassing sections along the Anacostia River, the Washington Channel and the Potomac River (p. 34). C100 has referred to this proposal as the "Washington Waterfront Walk." Now, 20 years later, good progress has been made with completion along the Anacostia River (the Anacostia Riverwalk Trail) and some sections along the Potomac River are already in place. However, there are some gaps: (1) the section along P Street SW from the Southwest Waterfront to South Capitol Street and (2) the section from 14th and Maine Avenue, SW across the Jefferson Memorial grounds to the Potomac River (NPS land). At the Georgetown end, an improved connection to the Georgetown Waterfront Park is needed. We believe the Parks & Open Space Element should address the next steps with the Washington Waterfront Walk, hopefully bringing the entire project to completion within the next five years.

### **Section D: Balance Multiple Uses within Parks**

The second sentence at the beginning of this discussion should include "education" as one of the multiple uses.

### **The federal government should:** (p. 36)

In POS.D.1 thru POS.D.7, the draft advocates minimizing impacts from development adjacent to parks and open space, including trails and parkways, to protect their natural and historic features. Here the Element should advocate that rather than **minimizing** such impacts, instead, to the extent possible, **avoid** such impacts, and any such development plans should address that if such impacts cannot be avoided, explain why they cannot be avoided and how the development will minimize such impact. There should also be a specific statement against any new roads along waterfronts.

### **Section E: Balance Commemorative Works within Parks**

#### **The federal government should:** (pp. 39-40)

In POS.E.1 thru POS.E.9 mentions the need to balance the need for public space uses with the memorial program and "sacred" space required by memorials based on size, surrounding context, and function of site. The term "sacred" has a religious connotation, and perhaps the term "consecrated" or "reverential" or some other word should be substituted. (pp. 7, 13)

### **Section F: Build Partnerships and Coordination among Multiple Landowners and Jurisdictions**

Partnerships and coordination are important if we are going to maximize the benefits of our parks and open space. POS.C.1 through POS.C.10 advocates improving public access to parks and open space, including removing barriers that limit physical or visual connectivity. This applies also to non-federal cemeteries, such as Congressional, in terms of the very high storm water run-off charges that are being charged to private

cemeteries.<sup>9</sup> The C100 argues that they should be treated the same as public parks and open space and not subject to such charges. Access should also be improved to various private and semi-public open spaces, such as private cemeteries. We note that cemeteries are being charged very high storm water run-off rates. C100 believes that these cemeteries should be treated the same as public parks and open space, and exempted from such charges. While the narrative and POS statements mention private and non-profit entities as partners, it would be beneficial to have more discussion and provide some examples such as Mount Vernon and Congressional Cemetery.

We appreciate the opportunity to comment on the draft Element and thank you for considering our comments. We look forward to seeing the final document.

Respectfully submitted,



Stephen A. Hansen  
Chair

Attachments:

Attachment A: Bird-safe federal buildings

Committee of 100 Comments on C&O Canal Historical Park - NEPA

Committee of 100 Comments on C&O Canal Historical Park - Section 106

cc:

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Thomas Luebke, Secretary -- U.S. Commission of Fine Arts

Eric Shaw, Director

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<sup>9</sup> WASA's Impervious Area charge has caused Congressional Cemetery's annual water bill to increase from \$350 to over \$200,000: <https://www.nbcwashington.com/investigations/Historic-DC-Cemeteries-in-Jeopardy-of-Closing-Due-to-Growing-Water-Bills-452918463.html>

Figure 1. Proposed route of the "Park Drive" along the west bank of the Anacostia River from Benning Road to Barney Circle through NPS parkland. DDOT, Middle Anacostia Crossings Study (2005), p. 7-1 (2005). Red arrows point to the "Park Drive."

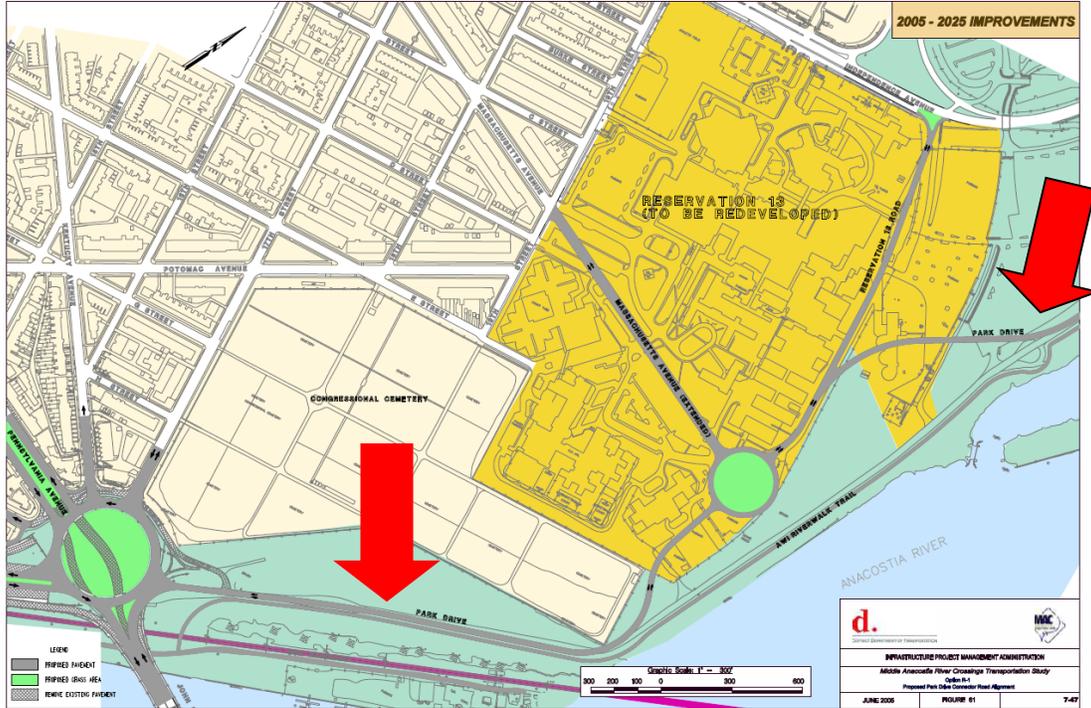
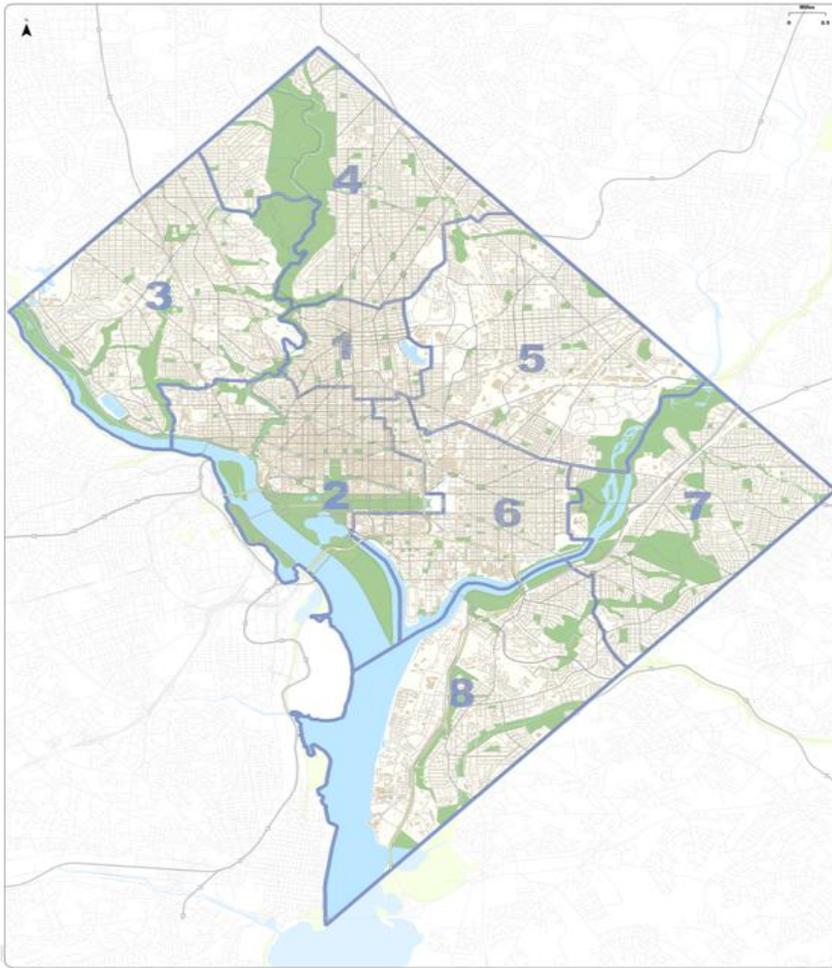


Figure 2. Ward 6 sorely needs parkland at or near the waterfront.



*Parkland in green*



Office of Planning ~ January 8, 2018  
Government of the District of Columbia



This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.

Ward 6 has less waterfront parkland than any other Ward that borders a river.<sup>10</sup>

<sup>10</sup> The acreage of parkland on the map, subdivided by Wards that border the Potomac and Anacostia rivers:

- Ward 2: 1485 acres
- Ward 3: 1364 acres
- Ward 5: 519 acres
- Ward 6: 192 acres**
- Ward 7: 1554 acres
- Ward 8: 850 acres

## Attachment A

### **Bird-safe federal buildings** (p. 22)

This section of the Parks & Open Space Element advocates allowing wildlife to follow natural migration patterns. p. 22. The Federal Environment Element (2016, pp. 18, 20) does not specifically address the effects of light pollution on bird deaths from collisions with federal buildings, or bird migration, and for this reason we suggest that these important issues be addressed in the next revision of the Federal Environment Element.

Many migrating birds are killed in collisions with buildings in DC. For this reason, we urge that this section mandate bird-safe measures on federal buildings to protect migrating birds. The federal government has already taken some steps to reduce bird collisions, and we hope that NCPC will build on this success.

We think of the District as an urban area. But in fact, the District is home to an average of 230 bird species year-round, and is also on the Atlantic flyway, and attracts thousands of migrating birds every spring and fall that stop here to rest and feed before continuing their journey. More than 60 species breed in the District, and our rivers are wintering locations for thousands of waterfowl.<sup>11</sup> The U.S Fish and Wildlife Service recognizes that "cities can become effective sanctuaries for birds and other wildlife." The District has joined other U.S. cities to become a U.S. Fish and Wildlife Service Urban Bird Treaty City in 2011.<sup>12</sup>

Collisions with structures may account for between 100 million and one billion bird deaths per year, as estimated by the U.S. Fish and Wildlife Service (2002). The D.C. Department of Energy and Environment (DOEE) Wildlife Action Plan (2015) concurs with these findings.<sup>13</sup> Bird deaths from collisions can also affect the viability of bird

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<sup>11</sup> DOEE, Wildlife Action Plan, p. 12, 13.

<sup>12</sup> The Urban Bird Treaty program is a unique, collaborative effort between the U.S. Fish and Wildlife Service and participating U.S. cities bringing together private citizens, Federal, State, and municipal agencies, and non-governmental organizations. Cities can become effective sanctuaries for birds and other wildlife, with an environmentally aware citizenry dedicated to conserving and enhancing natural resources. This is not only good for the birds, but also for the quality of life of people living in and visiting our cities. By restoring and conserving green-space, Urban Bird Treaty cities enhance urban areas for migratory birds that nest, overwinter, or pass through municipal and urban/suburban neighborhoods as well as for citizens. The Urban Bird Treaty program has an emphasis on education and outreach programs and includes resources for constructing schoolyard habitat sites, creating backyard habitats, and resources for educating citizens about birds and their conservation in an urban environment. Key features of the program also includes suggestions for reducing hazards to birds during migration; restoring, enhancing, and protecting avian habitats; providing education and outreach opportunities in urban and suburban communities; monitoring bird populations when appropriate; and creating and building career awareness and career development opportunities for young people." [www.fws.gov/birds](http://www.fws.gov/birds). Internet; accessed 13 Mar. 2016.

<sup>13</sup> DOEE's Wildlife Action Plan states: "**Collisions with Glass and Buildings** – An estimated 300 million to 1 billion birds are killed annually from collisions with glass on buildings and homes. The urban character of the District creates a dangerous gambit for migratory and residential species." Wildlife Action Plan, Ch. 4, p. 100, citing C. L. Seewagen and C. Sheppard. 2014. [Bird collisions with windows: An annotated bibliography](#). American Bird Conservancy, Washington, DC, 23 pages.

populations. Of all the bird species in the US, nearly one-third have been documented to be victims of collisions with buildings. Deaths of migrating birds include some of the strongest, healthiest birds, who otherwise would have survived to breed.<sup>14</sup>

*Lights Out DC* is a citizen science project run by City Wildlife that monitors downtown buildings in the District and collects victims of bird strikes. Over the past six years, *Lights Out DC* has collected more than 1,500 bird victims in just five buildings in a small area of downtown.<sup>15</sup> See table below. Types of collision threats to birds include transparent or reflective glass skyways and transparent glass areas illuminated at night.

Buildings monitored by *Lights Out DC* showing the number of bird strikes 2010-2015

<b>Building &amp; type of bird hazard<sup>16</sup></b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>	<b>2014</b>	<b>2015</b>	<b>Total</b>	<b>% Released</b>	<b>% Dead</b>
<b>Thurgood Marshall Federal Judiciary Building</b> 1 Columbus Circle, NE Transparent glass, plant-filled atrium, angled walls, reflections	36	23	31	39	48	32	209	43%	57%

<sup>14</sup> US Fish and Wildlife Service, *Migratory Bird Mortality: Many Human-Caused Threats Afflict Our Bird Populations*. (2002). Lesley J. Ogden, *Collision Course: The Hazards of Lighted Structures and Windows to Migrating Birds*, special report to the World Wildlife Fund Canada and the Fatal Light Awareness Program. Stephen B. Hager, Heidi Trudell, Kelly J. McKay, Stephanie M. Crandall and Lance Mayer "Bird Density and Mortality at Windows," *The Wilson Journal of Ornithology* 120(3): 550-470 (2008). Yigal Gelb and Nicole Delacretaz, "Windows and Vegetation: Primary Factors in Manhattan Bird Collisions," *Northeastern Naturalist*. 16(3):550-564. Christopher J. Klem, Jr., Nicole Delacretaz, Yigal Gelb, Peter Saenger, "Architectural and Landscape Risk Factors Associated with Bird-Glass Collisions in an Urban Environment," *The Wilson Journal of Ornithology* 121(1): 126-134 (2009), cited in San Francisco Department of Planning, "Standards for Bird-Safe Buildings," (2011). C. L. Seewagen, C. Sheppard. 2014. *Bird collisions with windows: An annotated bibliography*. American Bird Conservancy, Washington, DC. 23 pages, cited in DOEE's Wildlife Action Plan, p. 100.

<sup>15</sup> The number of collisions is likely higher than the figures above because researchers probably did not find 100% of birds killed. The birds killed by collisions at these buildings include dozens of species, both resident and migrating birds, and many birds classified by DOEE as "Species of Greatest Conservation Need" (SGCN). SGCN bird species are those "that are indicative of the diversity and health of the District's wildlife, including low and declining populations. ... The District's resident and breeding species keep the nation's capital high in biodiversity and ecologically healthy." In other words, birds dying from collisions with buildings include a wide range of species, not just birds that we may think of as common. For example, volunteers found ovenbirds, indigo buntings, black-throated blue warblers, ruby-throated hummingbirds, and woodcocks.

<sup>16</sup> In 2010, *Lights Out DC* volunteers walked their routes only 2 days per week. In all other years, volunteers monitored 7 days per week. Thus, calculations of bird strike reductions have been based on 2010 figures that were extrapolated from the 2010 data shown here.

Thurgood Marshall Federal Judiciary Building, 1 Columbus Circle, NE

The glass atrium in this building had been the source of many bird collisions, in part because there are live trees in the atrium. The Architect of the Capitol, which manages this building, reduced nighttime lighting immediately upon learning of the problem in 2011. Between 2011 and 2014, the atrium lighting was reduced between 11 pm and 6 am during migration seasons, and bird collisions were reduced by 2/3. Now the atrium lighting is reduced from 11 pm and 6 am all year round. (Collision statistics are pending.) The energy savings of this reduced lighting are significant, from an atrium load of 77 kW to 4.25 kW during the night. Over a period of a year, energy use has been reduced by 28%.

LEED Pilot Credit 55: Bird Collision Deterrence (2015) is widely accepted and effective method to reduce bird collisions. See also Federal Bird-Safe Buildings Act of 2017, HR 2543 (introduced 18 May 2017). For these reasons we suggest a new POS.

**new POS. Support bird migration by adopting bird-safe measures on all new federal buildings, and, where feasible, retrofit buildings for bird safety.**

[suggested changes in bold]

The Committee of 100  
on the Federal City



www.committeeof100.net

Mr. Kevin D. Brandt, Superintendent  
[Kevin.Brandt@nps.gov](mailto:Kevin.Brandt@nps.gov)  
C&O Canal National Historical Park Headquarters  
1850 Dual Highway  
Suite 100  
Hagerstown, MD 21740

January 5, 2017

RE: Comments on the National Park Service Environmental Assessment of the C&O  
Canal National Historical Park Georgetown Plan

Dear Superintendent:

The Committee of 100 on the Federal City (C100) was founded in 1923 and continues to work toward protecting and enhancing, in our time, Washington's historic distinction, natural beauty and overall livability. The Committee is concerned with respecting the L'Enfant Plan of 1791 and the McMillan Commission Plan of 1901-02, while accommodating the needs of the 21st Century, and with providing responsible oversight in all pertinent aspects of citywide planning. These include parks and conservation, historic preservation, visual planning and architecture, land use regulation and renewal planning, pollution control and environmental protection, and transportation planning.

The Committee is pleased to submit the following comments on the Environmental Assessment under the National Environmental Policy Act (NEPA). A copy of this letter will be sent to [parkplanning.nps.gov/Georgetowncanalplan](http://parkplanning.nps.gov/Georgetowncanalplan). Our comments under Section 106 of the National Historic Preservation Act will be submitted in a separate letter.

Summary

The concept plan offers excellent ideas, including refilling the canal, restarting canal boat rides, adding a new visitor center, improved signage, and grading the towpath for safety. The canal has endured repeated and severe floods, scouring the canal and damaging its structure. Therefore, for the concept plan to succeed, every alternative selected must be sustainable, able to withstand flooding. For example, flood-vulnerable alternatives such as boardwalks, elevators, new flower beds, and alternatives B and C for the towpath should be re-evaluated.

NPS states that the canal floods approximately every 10 years. An NPS publication, *Historic Resource Study: Chesapeake & Ohio Canal*, documents that the canal flooded

38 times during the 19th century. The canal flooded again in 1902, 1907, 1914, 1924, 1936, 1942, 1972, and 1996. Many of these floods damaged the Georgetown section.<sup>1</sup> The most recent major flood was in 2010.<sup>2</sup> Climate change, rising river levels, and more frequent extreme rain events will combine to make future canal floods more severe.

In 2016, a study was done for the National Park Service (NPS), *C&O Canal Lower Reach Flood Response Plan*. This study appears to be very important for the Environmental Assessment, but is not yet public, and we urge that it be posted on the PEPC website and used in evaluating the environmental impacts of the concept plan.

More detailed information and questions are contained in the attachment to this letter.

Thank you for considering our comments. For additional information or questions please email [info@committeeof100.net](mailto:info@committeeof100.net) or call 202.681.0225.

Sincerely,



Stephen A. Hansen, Chair  
Committee of 100 on the Federal City

Attachment

cc:

[parkplanning.nps.gov/Georgetowncanal](http://parkplanning.nps.gov/Georgetowncanal) plan

[Kevin Brandt@nps.gov](mailto:Kevin.Brandt@nps.gov)

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<sup>1</sup> Harlan D. Unrau, *Historic Resource Study: Chesapeake & Ohio Canal* (Hagerstown, Md.: National Park Service, 2007, 277-318, 312).

<sup>2</sup> "Canal Flood Information," [www.nps.gov/choh/learn/historyculture/Canalfloods](http://www.nps.gov/choh/learn/historyculture/Canalfloods). Internet; accessed 2 Dec. 2017. Donna Childress, "Heavy Flooding Impacts C&O Canal National Historical Park, Great Falls Park, And Other D.C. Area Parks," [www.nationalparkstraveler.org](http://www.nationalparkstraveler.org), 26 Mar. 2010.

## ATTACHMENT

### COMMITTEE OF 100 COMMENTS ON THE NATIONAL PARK SERVICE ENVIRONMENTAL ASSESSMENT OF THE C&O CANAL NATIONAL HISTORICAL PARK GEORGETOWN PLAN

#### **Purpose and Need for the Project:, including sustainability in floods**

The concept plan states:

The purpose of the proposed action is to develop a plan to enhance the one-mile portion of the C&O Canal National Historical Park (NHP) in Georgetown, from the Zeromile marker to the Alexandria Aqueduct. The plan will focus on addressing deferred maintenance issues and related safety and accessibility concerns associated with the towpath; improving connections between Georgetown and the C&O Canal towpath; enhancing visitor experience through increased signage and optimizing underutilized areas. The plan will be developed in a matter that addresses the identified needs, while also preserving the historic character and cultural significance of the C&O Canal NHP and the Georgetown Historic District (DC Landmark, National Register of Historic Places, National Historic Landmark).

The plan is needed to provide a coordinated approach to address the following concerns:

- Portions of the towpath are uneven, narrow, and poorly lit, creating potential safety hazards;
- Visitors with limited mobility can only access the towpath from Grace Street, NW (south of the canal). All other access points are not compliant with the Architectural Barriers Act Accessibility Standards (ABAAS);
- Many access points to the towpath are not readily visible or unknown due to lack of signage;
- The park desires to expand opportunities for interpretation, education, and cultural programming;
- The park has limited amenities and facilities for visitor comfort such as seating, drinking fountains, and rest rooms; and
- Several plazas along the canal are underutilized and could be developed to provide additional recreational activities.

#### **Sustainability: C&O Canal flooding**

NPS states that the canal floods approximately every 10 years. The most recent major flood was in 2010.<sup>3</sup> As discussed below, major floods are likely to be more frequent and

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<sup>3</sup> "Canal Flood Information," [www.nps.gov/choh/learn/historyculture/Canalfloods](http://www.nps.gov/choh/learn/historyculture/Canalfloods). Internet; accessed 2 Dec. 2017. Donna Childress, "Heavy Flooding Impacts C&O Canal National Historical Park, Great Falls Park, And Other D.C. Area Parks," [www.nationalparkstraveler.org](http://www.nationalparkstraveler.org), 26 Mar. 2010.

more severe. For these reasons, all planning for the C&O Canal must accept the realization that the canal is in a flood plain, has already flooded many times, and will flood again in the future. Therefore, in order for the concept plan to succeed, every alternative selected must be flood-sustainable.

We understand that HDR, Inc. completed a study for NPS, *C&O Canal Lower Reach Flood Response Plan* (December 2016), and that this study assesses aspects of flooding including Rock Creek, and possible overflow or rupture of a sewer line in the Potomac River leading from Virginia to the Blue Plains Advanced Wastewater Treatment Plant in Southwest Washington, which could cause sewage to flow into the canal.<sup>4</sup> Posting this study on the PEPC website would assist everyone participating in the Environmental Assessment.

An NPS publication, *Historic Resource Study: Chesapeake & Ohio Canal*, documents that the canal flooded 38 times during the 19th century, and many of these floods damaged the Georgetown section.<sup>5</sup> The 1889 flood was particularly destructive, damaging stonework, mills, warehouses, and wharf facilities in the Georgetown section. The mole and towpath were washed badly, and 1,200 cubic yards of material was deposited in the basin. The steam dredge and scows in the Georgetown section were gone. One observer wrote, "From the mouth of the Monocacy to Georgetown, nothing but ruin can be seen."<sup>6</sup>

The canal flooded again in 1902, 1907, 1914, 1924, 1936, 1942, 1972, and 1996. Many floods damaging the Georgetown section resulted from the Potomac River flooding and breaking through to the canal, and flooding the canal downstream. In 1936, the Potomac flooded into the canal near the Old Angler's Inn and the banks at the Georgetown Level were washed and the prism (the shape of the canal in cross-section) was heavily silted.<sup>7</sup> The 1972 flood (Hurricane Agnes) was a "major disaster." Virtually every bridge and 95 percent of the picnic tables were lost.<sup>8</sup> The canal suffered two damaging floods in 1996. The concrete retaining wall built at the Old Angler's Inn after the 1936 flood gave way in January 1996 and, the flood covered "more than 80 percent of the canal, ripping out canal banks and damaging many historic structures," leaving behind deep mud, silt, debris and downed trees." Hurricane Fran, September 1996, wiped out the repairs made after the January flood, and repairs had to begin over again.<sup>9</sup>

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<sup>4</sup> See [www.dcwater.com/potomac-interceptor](http://www.dcwater.com/potomac-interceptor).

<sup>5</sup> Harlan D. Unrau, *Historic Resource Study: Chesapeake & Ohio Canal* (Hagerstown, Md.: National Park Service, 2007, 277-318, 312).

<sup>6</sup> "Maryland and the Canal," *Washington Star*, 10 June 1889, 5.

<sup>7</sup> *Historic Resource Study*, 319. Karen Grey, "The Canal Prism: Variable and Dangerous," *Along The Towpath*, June 2013.

<sup>8</sup> Duncan Spencer, "Flood Ruined C&O Canal," *Washington Star*, 30 June 1972, 23.

<sup>9</sup> Napier Shelton, *Potomac Pathway: A Nature Guide to the C & O Canal* (Arglen, Penn.: Schiffer Publishing, Ltd. 2011, 100-101).

<sup>9</sup> Duncan Spencer, "Flood Ruined C&O Canal," *Washington Star*, 30 June 1972, 23. Erik Wemple, "Hate Canal," *Washington City Paper*, 7 Nov. 1997. The Georgetownner reported floods in 2010 and 2011. Samantha Hungerford, "C&O Canal Makes Emergency Flood Preparations," 9 Sept. 2011. Jim Keary and Arlo Wagner, "River's rise washes out morning rush - "Today may see repeat of slow ride," *Washington Times*, 10 September 1996, sec. A, p. 1. The Potomac River crested at Georgetown about 5:45 a.m.

Washington Harbour, on the Potomac River, is approximately one mile northwest of the Zeromile marker and one-half mile west of Rock Creek, offers useful data on flooding. The complex was built with flood gates, which needed to be raised during seven floods between 1986 and 2012.<sup>10</sup>

**Potomac River Flooding**

The flood stage on the Potomac River is 7 feet above average level. Moderate flooding occurs at 8 feet, major damage begins at 10 feet.<sup>11</sup>

Month	Year	Feet above average river level-- Georgetown
November	1877	16.5
June	1889	19.5
March	1924	8.0
March	1936	20.25
October	1942	17.72
June	1972	15.4
February	1979	13.1
November	1985	11.75
April	1987	8.0
March	1994	10.3
January	1996	13.8
September	1996	12.1
September	2003	13.75
April	2011	10.00 -12.00
October	2012	9.0

The *Historic Resource Study* concludes: "One of the principal reasons for the collapse of the canal was the recurrence of great floods which repeatedly wrecked the waterway. The forces of nature were continually at work tearing down the physical fabric of the waterway and interfering with its trade."<sup>12</sup> Although flooding has and will damage canal infrastructure, NPS notes that floods provide important environmental benefits.<sup>13</sup>

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yesterday at 13.75 feet, 6.75 feet above flood stage - about a foot less than in January - and dumped about 4 feet of water onto 31st and Water streets in Georgetown. The water covered only about two blocks of Water Street, and businesses were prepared with sandbags in front of their doors."

<sup>10</sup> "Washington Harbour," wikipedia. Internet; accessed 29 Nov. 2017.

<sup>11</sup> Steve Vogel, "Bulk of Flooding Expected in Old Town, Washington Harbour." Washington Post., 28 June 2006. cited in "Washington Harbour," wikipedia. Ivelisse DeJesus, "Flood? What Flood? They Asked Dryly." Washington Post., 10 February 1996. Karlyn Barker and John Ward Anderson, "Destructive Floods Hit D.C., Richmond," Washington Post, 8 Nov. 1985, sec. A, p. 1. Unrau, *Historic Resource Study*, 312, 318.

<sup>12</sup> *Historic Resource Study*, 322.

<sup>13</sup> "Flooding, of course, has been part of the Potomac River for millions of years. As a result, flood-adapted habitats such as floodplain forests and scourbars, have been created. These habitats have gained significance in Maryland and nationally due to increasing habitat loss and fragmentation from development and invasion of alien plant species. In fact, many rare plants depend on these unique habitats. ...

### **Increased flooding risk from climate change**

The Potomac River faces increased threats of flooding for three reasons:

- (1) Washington, DC, part of the Chesapeake Bay system, is sinking, which is raising river water levels.<sup>14</sup>
- (2) Climate change is raising sea levels, and, as a result, raising river levels.
- (3) Climate change is predicted to cause more frequent and more extreme rain events.

#### **(1) Chesapeake Bay region land subsidence**

The Chesapeake Bay is an inland estuary of the Atlantic Ocean, bordered on the north by Maryland and in the south by Virginia. It was formed by a crater from a meteorite that struck 35 million years ago. The region has been subsiding approximately .05 inches each year for the last thousand years, raising river levels independently from the effects of climate change.<sup>15</sup>

#### **(2) Rising sea and river levels from climate change**

DC Department of Energy and Environment (DOEE) released its "Climate Change Adaptation Plan" (2013) describing expected sea level rise. DOEE's 2016 report, "Vulnerability & Risk Assessment: Climate Change Adaptation Plan for the District of Columbia" considers the projected effects of climate change in 2020, 2050, and 2080, such as higher water levels. The Georgetown section of the canal is within the 500-year (2080) flood plain. Figures 1, 2.

- Scientists predict temperature warming by two degrees Centigrade (C) by 2040, causing a global sea rise of 20 cm (7.8 inches), with even higher rises in more

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Periodic inundation of the banks of the Potomac River and bordering C&O Canal NHP benefits the natural system as a whole. Silt, enriched by nutrients and minerals, is deposited by flood waters creating fertile soils which foster biological diversity.

Floodplain forest habitat comprises about 85% of the park and benefits from such soils. Many spring wildflowers that attract the public to the park thrive in this habitat. Fertile soil can also be scoured away by the swift river, leaving substrates of rock or sand on the river's edge. These dynamic habitats are called floodplain scourbars which support unique floral communities. Floods also carry seeds great distances helping rare and endangered species to establish in new locations. Unfortunately, this also helps alien weeds that may out compete native plants. Some trees, such as silver maple and sycamore, take advantage of the potential for water transport by producing seeds that float. While some plants gain wider distribution, others can disappear entirely from certain locations. Floods also clear debris from the forest floor, but can damage trees by the powerful rush of water.

Although some organic matter and nutrients are lost from the system, disturbances, like floods, make room for new growth and allow sunlight to reach plants and young trees." "Canal Flood Information," [www.nps.gov/choh/learn/historyculture/Canalfloods](http://www.nps.gov/choh/learn/historyculture/Canalfloods).

<sup>14</sup> Kelsey Robertson, "Resilient History: Protecting Chesapeake Bay Coastal Historic Districts from Rising Seas Through Adaptive Planning," Thesis, Masters of Professional Studies in Urban & Regional Planning, Georgetown University (2016).

National Oceanic and Atmospheric Administration (NOAA), *Adapting to Climate Change: A Planning Guide for State Coastal Managers*, (Silver Spring, Md.: NOAA Office of Ocean and Coastal Resource Management: 2010), [noaa.gov/climate/adaptation.html](http://noaa.gov/climate/adaptation.html).

<sup>15</sup> United States Geological Survey (USGS), *The Chesapeake Bay: Geologic Product of Rising Sea Level* (Reston, Va: USGS, 1998), <http://pubs.usgs.gov/fs/fs102-98/>.

than 90 percent of coastal areas.<sup>16</sup> If warming exceeds two degrees C, by 2100 the sea level rise is estimated to exceed 1.8 meters (5.94 feet) for 80 percent of coastal areas.

- Other predictions are similar: By 2100, estimates of sea level rise range from three feet (Intergovernmental Panel on Climate Change), to five feet (US Army Corps of Engineers (USACE)), to 6.5 feet (National Oceanic and Atmospheric Administration (NOAA)).<sup>17</sup>
- The Potomac River is tidal, and therefore sea level rise will raise the water level in the river.
- In the last 90 years, the water level in the river has already increased 11 inches, and nuisance flooding has already increased 300%.<sup>18</sup> Nuisance flooding is flooding experienced at high tide (as established by the National Weather Service).
- NOAA has been monitoring sea levels and flooding in DC since 1924, and the mean sea level has been increasing at the rate of 3.21 mm (0.126 inches) per year. Nuisance flood level is 0.31 meters (1.22 feet) above mean high higher water.<sup>19</sup> Flooding is already increasing.
- Several sections in the project appear in Federal Emergency Management Agency's (FEMA) 2010 flood plain. Figure 3.
- By 2080, the water level in the river is expected to rise an additional 3.4 feet.<sup>20</sup>
- Sea levels (and river water levels) may rise higher and faster, if the rates of ice loss accelerate, as reflected in USACE's estimate of a five-foot sea level rise, and NOAA's estimate of a 6.5-foot rise.<sup>21</sup>

As discussed below, boardwalks are proposed at two locations.

### (3) More frequent extreme rain events

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<sup>16</sup>Svetlana Jevrejeva et al., "Coastal sea level rise with warming above 2° C," Proceedings of the National Academy of Sciences, [www.pnas.org/cgi/doi/10.1073/pnas.1605312113](http://www.pnas.org/cgi/doi/10.1073/pnas.1605312113). National Aeronautics and Space Administration, "Adapting to a Changing Climate: Federal Agencies in the Washington, DC Metro Area," (2012) [www.mwcog.org](http://www.mwcog.org). Internet; accessed 13 Nov. 2016. Authorities cited in DOEE, "Wildlife Action Plan," 114-117 (2015).

<sup>17</sup>Cited in Elizabeth Kolbert, "The Siege of Miami," *The New Yorker*, Dec. 21 and 28 (2015), 42-50, 42.

<sup>18</sup>NOAA, William Sweet, et al., "Sea Level Rise and Nuisance Flood Frequency Changes Around the United States." NOAA Technical Report NOS CO-OPS 073, vi (2014).

<sup>19</sup>NOAA, "Sea Level Rise and Nuisance Flood Frequency Changes Around the United States."

<sup>20</sup> U.S. Army Corps of Engineers estimate, cited in DOEE, *Climate-Ready DC*, " 3.

<sup>21</sup>DOEE, "Climate Ready DC," 2-3. DOEE, "Vulnerability & Risk Assessment," 19. See Elizabeth Kolbert, "A Letter from Greenland: A Song of Ice: What happens when a country starts to melt?" *The New Yorker*, 24 Oct. 2016, 50-61.

As a result of climate change, a 100-year rain event is projected to occur once in 25 years by 2050 and once in 15 years by 2080. (A 15-year rain event is 5.2 inches of rain during a 24-hour storm.<sup>22</sup> An extreme rain event, eight inches of rain, is a "100 year rain event.")

Annual precipitation is expected to remain approximately the same, but concentrated in fewer events, and coastal storms will be more intense. In the future, fewer, more intense precipitation events, combined with more intense coastal storms, when added to the predicted rise in the river's water level is expected to further increase the risk of flooding in more areas. (For precipitation, the 2080 higher scenario is 14 inches for the 100-year, 24-hour storm, and the lower scenario is five inches for a 15-year, six-hour storm.)<sup>23</sup> Figure 4.

Heavy rains cause flooding and pollution from storm water runoff.<sup>24</sup> DOEE's maps, based on data from the USACE and the FEMA, show areas in 2010, 2020, 2050, and 2080, areas of known flood risk, a proxy for priority risk areas.<sup>25</sup>

### **Flood sustainability of alternatives**

Flood sustainability is necessary to avoid adverse impacts from adopting any of the Alternatives. For this reason, any alternative selected must be able to withstand flooding, be easy and economical to repair or replace, and be least likely to be washed away to clog the canal or become debris in the Potomac River, an adverse effect on the river, engineered structures such as bridges, and a danger to navigation.<sup>26</sup> The simpler Alternatives A are generally more sustainable than Alternatives B or C.

#### More sustainable alternatives

Leveling the towpath (Towpath Alternative A), improving access, adding way finding signs at street level or using mobile apps (e.g., C&O Canal Explorer Mobile App, from [www.canaltrust.org](http://www.canaltrust.org)) are beneficial improvements that should be sustainable.

The ticket kiosk, boat launch and renovated NPS office are essential for the boat rides, and the pollinator meadow should be economical to restore. A new visitor center could be designed to be sustainable.

The Grove and The Locks show a more restrained and generally better approach, regrading the towpath, and minimal interventions.

#### Less sustainable alternatives

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<sup>22</sup>DOEE, "Vulnerability & Risk Assessment," 38.

<sup>23</sup>DOEE, "Vulnerability & Risk Assessment," 20.

<sup>24</sup>DOEE, "Climate Ready DC," 2-3.

<sup>25</sup>DOEE, "Vulnerability & Risk Assessment," 20.

<sup>26</sup> Ryan N. Tyler, "River Debris: Causes, Impacts, and Mitigation Techniques," prepared for Ocean Renewable Power Company by the Alaska Center for Energy and Power (2011) [www.uaf.edu](http://www.uaf.edu). Internet; accessed 4 Dec. 2017.

The Towpath Alternative B alters the canal walls, adding a new layer of stone, and Alternative C adds a cantilevered edge over the canal or a vegetated edge.<sup>27</sup> These interventions would be more costly to repair if damaged, than just repairing any damage to the original walls of the canal.

Boardwalks are proposed for the Walls. They compromise this industrial section of the canal, and appear to be susceptible to flood damage, to becoming debris, and create unnecessary infrastructure to be repaired or replaced. Depending on the expected useful life of these boardwalks, they should be evaluated under the flood plains for 2010, 2020, 2050, or 2080.

The Zeromile marker, a wild partially secluded place, is right on the river, and the proposed new plantings, seating, and floating classroom should be re-evaluated for flood sustainability. Depending on its useful life, the boardwalk in Alternative B may be susceptible to damage, and if so may create floating debris, and need repair/replacement. The nearby Washington Harbour boardwalk has been damaged by flooding.<sup>28</sup>

New hardscape (The Markets, The Walls) detracts from the historic experience of the canal and appears susceptible to flood damage.

Three elevators are proposed: The Walls, Market Places, and The Bend (34th Street) . Water-damaged elevators would be expensive to repair or replace. Access for disabled visitors should be reevaluated for different locations, or using more sustainable technology.

New flowerbeds, e.g., at the Bend, detract from the historic industrial landscape. New trees are proposed for the Walls, the Locks, and the Grove. These elements are subject to destruction in a flood, washing away into the canal or the river creating silt and debris in the canal or the river.

The Rock Creek Confluence is subject to flooding both from the canal and from Rock Creek. The sloped lawn/nature classroom, and native riparian planting are in a low elevation and are very vulnerable. For this reason, any new plantings should be able to withstand flooding, and a list of appropriate wetlands-friendly plants should be developed and used in the alternatives.<sup>29</sup> The proposed footbridges need to be designed for flood resilience.

Drinking fountains (see Purpose and Need), lighting, benches (Towpath Alternatives B, C), chaise lounges (The Walls), tables and chairs (The Grove), lounge chairs (The Bend), and hammocks (the Zeromile marker, Alternative B) are vulnerable to being washed away but should not be costly to replace (with the possible exception of the lighting).

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<sup>27</sup> At the November 2, 2017 public meeting, one of the featured speakers mentioned possibly engraving the names of former landowners in the new stone edge. This information can be most easily and economically communicated in a phone app.

<sup>28</sup> "Washington Harbour," wikipedia. Internet; accessed 29 Nov. 2017.

<sup>29</sup> See DOEE Wildlife Action Plan (2016), Ch. 3, Habitats.

## **Purpose and Needs**

We agree that deferred maintenance must be addressed. As noted in the Purpose and Needs statement, an essential goal is "preserving the historic character and cultural significance of the C&O Canal NHP and the Georgetown Historic District (DC Landmark, National Register of Historic Places, National Historic Landmark)." Refilling the canal, bringing back the canal boats and the mules are key to meeting these goals. Other Purpose and Needs of the project can be met:

- *Portions of the towpath are uneven, narrow, and poorly lit, creating potential safety hazards:*

Towpath Alternative A, as noted in that alternative, would create a level, safe path, and is the most flood-sustainable of the Alternatives.

- *Visitors with limited mobility can only access the towpath from Grace Street, NW (south of the canal). All other access points are not compliant with the Architectural Barriers Act Accessibility Standards (ABAAS):*

Please see below re: possible additional ABAAS access from behind the Four Seasons Hotel. Because of the vulnerability of the three proposed elevators to flooding, these elevators should be restudied to see if more flood-sustainable technology could be used, and if all three elevators are in fact needed.

- *Many access points to the towpath are not readily visible or unknown due to lack of signage:*

We agree that additional way finding signs are needed, to direct visitors to and from the canal, the ticket kiosk and boat launch, interpretive center, and to food and rest rooms in Georgetown.

- *The park desires to expand opportunities for interpretation, education, and cultural programming:*

The new interpretive center should be a major benefit. We suggest that phone apps would be a flexible and cost-effective method for interpretation, education. The Aqueduct offers an opportunity for events, and events have been held at the Locks.

- *The park has limited amenities and facilities for visitor comfort such as seating, drinking fountains, and rest rooms:*

The concept plan proposes rest rooms for the restored NPS office, and in a new interpretive center. The park is in an attractive urban area which offers seating, water, plus dining; nearby businesses should be encouraged to provide amenities to canal visitors.

- *Several plazas along the canal are underutilized and could be developed to provide additional recreational activities:*

It would be helpful to know what recreational activities are needed at these locations. NPS plans to resume the boat rides, and the Locks and the Aqueduct can be used for

public events. If the property owners agree, these plazas might be used to host activities, without the need to alter the canal's walls.

### **Questions**

While the plan contains graphics and some text for each section, considerably more information is needed on existing conditions, what is proposed, and the reasons for the new proposals. In future reports, the plan maps should be “continuous”, rather than the present arrangement, where in some cases there are small gaps between different sections.

- Are there plans to dredge the canal? If so, to what depth and in which sections?
- What is the proposed surface of the towpath in each section and under each Alternative?
- Purpose and Needs states that the canal is poorly lit, but it appears that the canal is not now open at night.<sup>30</sup> Will this change? If so, what is the lighting plan and will all lighting fixtures be flood-sustainable?
- Would all lighting meet the standards for a seal of approval from the International Dark-Sky Association?<sup>31</sup>
- Purpose and Needs states, "Visitors with limited mobility can only access the towpath from Grace Street, NW (south of the canal). All other access points are not compliant with the Architectural Barriers Act Accessibility Standards (ABAAS)." Is it possible to modify the access and towpath behind the Four Seasons Hotel to comply with ABAAS, and create an additional access point?
- Will more people be attracted to the canal and adjacent areas? How many more? What is the maximum number of visitors that the canal infrastructure can accommodate? What methods can be used to regulate the number of visitors, if necessary?
- How will visitors reach the canal? Public transportation, ride sharing, private automobile, biking, walking? What are the parking needs because of increased visitation to the Canal? What will be the effect on air quality?

### **Questions on mules**

- The mules are a vital part of the canal's history and their welfare is very important.<sup>32</sup>

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<sup>30</sup> "The Chesapeake and Ohio Canal National Historical Park is open during daylight hours year round." [www.nps.choh/planyourvisit/hours.htm](http://www.nps.choh/planyourvisit/hours.htm) updated 28 Oct. 2016.

<sup>31</sup> Fixtures approved by IDA employ warm-toned (3000 K or lower) white light sources or employ amber light sources or filtered LED light sources, are full-shielded, emit no light above the horizontal plane, have no sag or drop lenses, side light panels, or uplight panels, etc <http://darksky.org/fsa/apply-fsa>.

<sup>32</sup>"Meet the Mules," <https://www.nps.gov/choh/planyourvisit/meetthemules.htm>.

- Will the mules be housed in a stable in the mule yard?
- What sections of the canal will the mules traverse?
- What routes will the mules follow to pull the future canal boat from the Locks to the west?
- How far west will they pull canal boat (as far as the Aqueduct or beyond)? This decision has a number of influences on the design of the canal.<sup>33</sup>
- The proposal to cantilever the canal edge, creating a wider towpath might interfere with mules towing the canal boat (changing the angle of the towrope). How would this arrangement affect the flow of mule and pedestrian traffic?
- What will be the surface of the towpath in those areas, and will it be safe for mules?

### Rock Creek

- Where would the towpath be regraded? Near Rock Creek Parkway?
- How would the West Heating Plant be accessed? Inside the wall?

### The Locks

- Is the arcade in an existing building? How would it be accessed?

### The Bend

- Is bridge over the canal to be changed to a more horizontal orientation? Alternative A seems to be a straighter access than Alternative B.
- Will the jasmine on the north wall remain?
- Are the proposed flowerbeds on private property?

### The Aqueduct

- How is this space used currently?
- What is the distance from the shore to the edge of the aqueduct.?
- Will the new proposed surface be gravel or hardscape?
- Will railings be added? (None are there now).
- Both Alternatives include a new boathouse. Who would use it? How would it be accessed from the towpath? What is the estimated cost and the amount and source of funding for construction?

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<sup>33</sup> In the past, canal boat rides pulled by mules began and ended at the NPS visitor center at 1057 Thomas Jefferson Street, NW. "Special Musical Boat Rides Available on the C&O Canal in Georgetown Saturdays in July By Georgetown Visitor Center." 2006.  
<https://www.nps.gov/choh/learn/news/musicalboatridesingeorgetownduringsummer.htm>

Figure 1. Projected sea level rise in DC historic districts. Arrow points to C&O Canal in the 2080 flood plain. Source: Kelsey Robertson, arrow added.

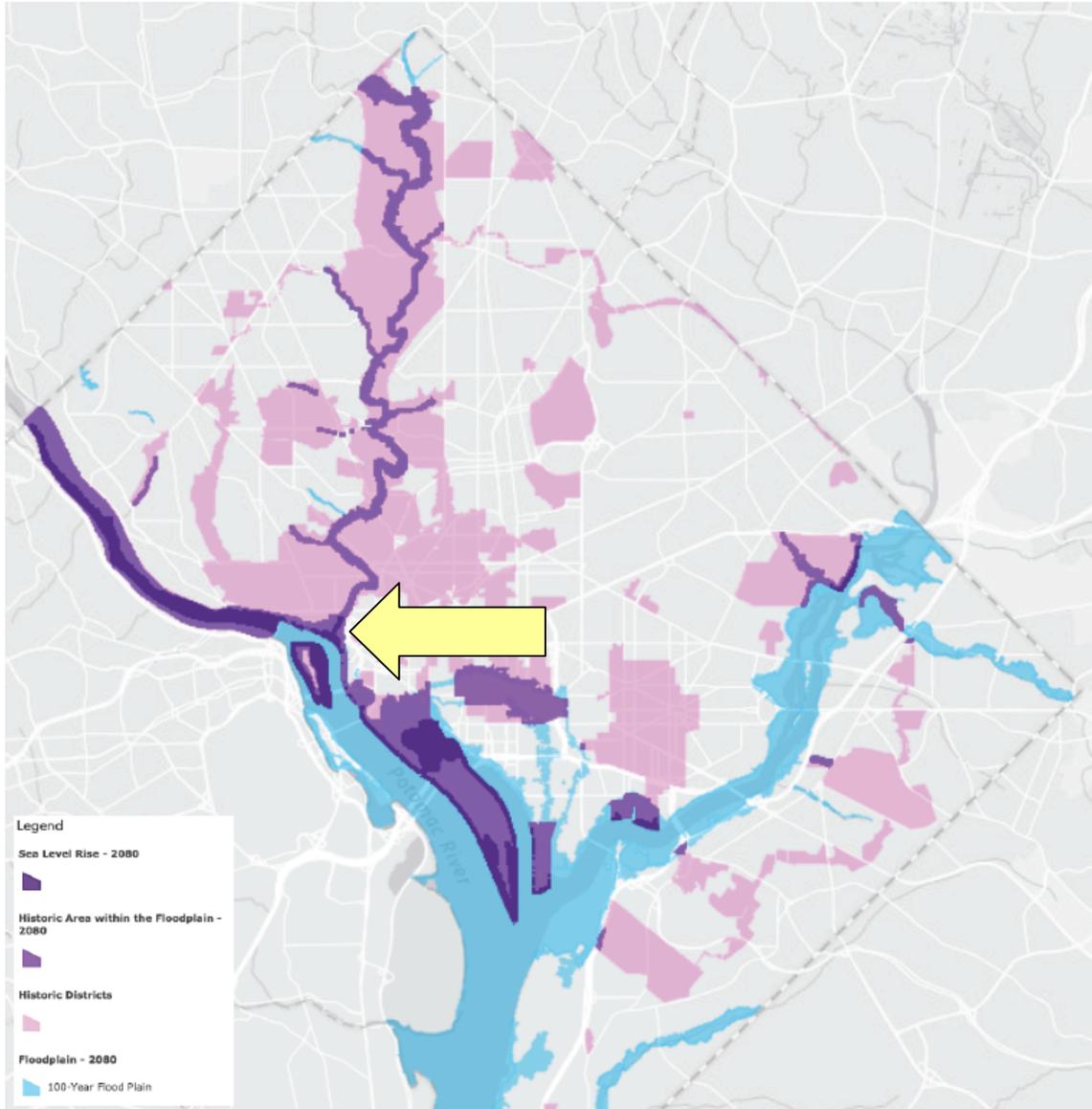
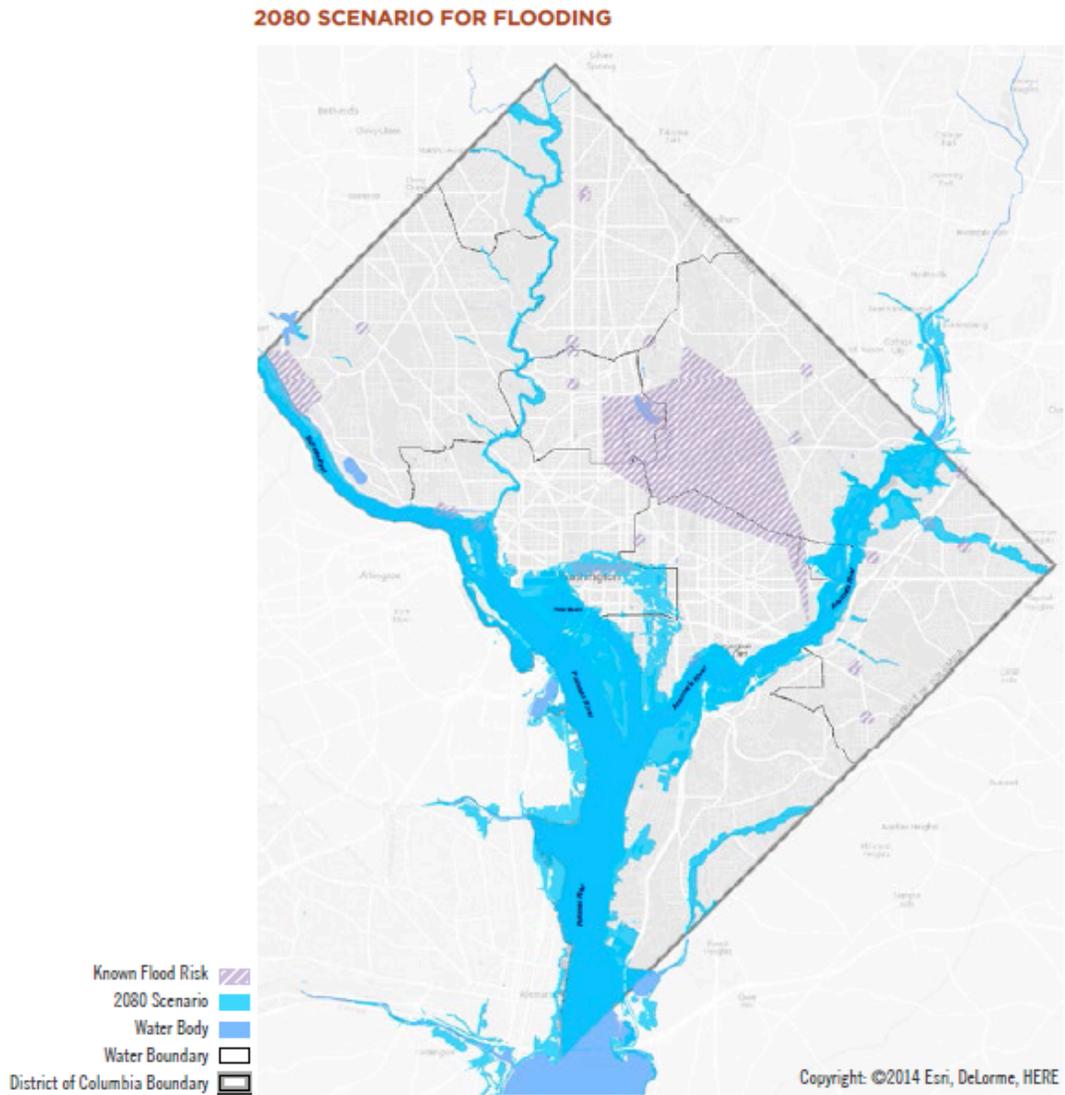


Figure 2. DOEE, "Vulnerability & Risk Assessment: Climate Change Adaptation Plan for the District of Columbia" (2016), Map 4 (500-year flood plain, 2080).



**MAP 4:** 2080 Scenario based on current FEMA 500-year floodplain as a proxy for the current FEMA 100-year base flood elevation + 4 feet of sea level rise. (Source: NACCS map and historic flooding as identified by stakeholders overlaid on GIS map base, Kleinfelder, 2015)

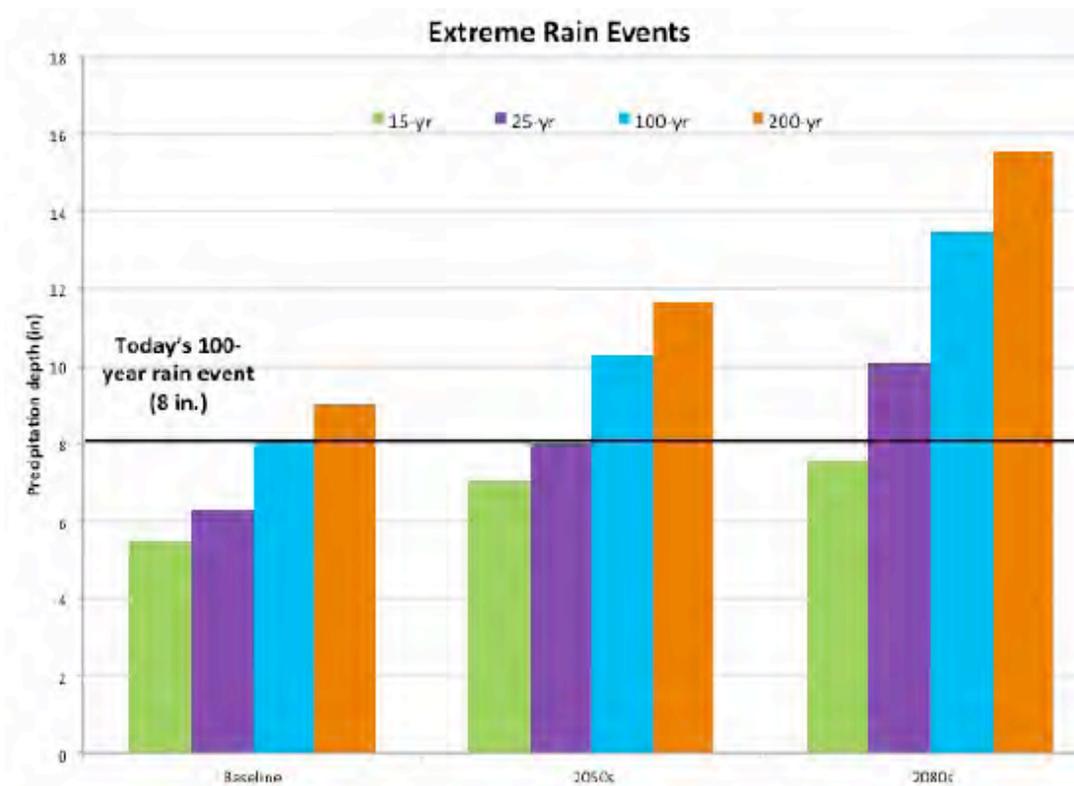
Figure 3. Zone AE: 100-year floodplain and Zone X Shaded (orange): 500-year floodplain) according to the effective Flood Insurance Rate Map, dated September 27, 2010 and FEMA approved revisions.



Figure 4. DOEE, "Climate Ready DC," p. 3.

### Rainfall & Flooding

**Rainfall:** Annual amounts of precipitation have not changed significantly; however, more precipitation is falling in the fall and winter and less in the summer. What is expected to change significantly is the frequency and intensity of heavy rainfall events that can cause flooding and pollution from stormwater run-off. As shown in the chart, today's one in 100-year rainfall event could become a one in 25-year event by mid-century, and a one in 15-year event by the 2080s.



The Committee of 100  
on the Federal City



www.committeeof100.net

Mr. Kevin D. Brandt, Superintendent  
[Kevin.Brandt@nps.gov](mailto:Kevin.Brandt@nps.gov)  
C&O Canal National Historical Park Headquarters  
1850 Dual Highway, Suite 100  
Hagerstown, MD 21740

January 5, 2018

RE: Section 106 Review Comments on the October 2017 *C&O Canal Concept Plan*

Dear Superintendent Brandt:

The Committee of 100 on the Federal City submits the following comments on the October 2017, *C&O Canal National Historical Park - Georgetown Canal Plan* (“Plan”). We do so under the rubric of Section 106 of the National Historic Preservation Act in our capacity as a Consulting Party.

We applaud the National Park Service’s, Georgetown Heritage’s, and The Georgetown Business Improvement’s interest in rehabilitating and increasing public enjoyment and access to the one-mile C&O Canal section in Georgetown. However, these laudable goals must not be achieved at the expense of the Canal’s historic character and significant constituent elements. Such appears to be the likely outcome in many of the Plan design alternatives and, if built, will result in significant adverse impacts to the Canal as defined under Section 106 (36 CFR Part 800 Protection of Historic Properties), National Historic Preservation Act (P.L. 89-665; 54 U.S.C. 300101 *et seq*).

The C&O Canal National Historical Park is a remarkable survival of our early Republic’s and the national capital’s industrial story. Though much changed in places, it is, by nature, industrial and gritty. Many of the Concept Plan’s proposals seek to inappropriately obliterate, tame, “improve on,” or redefine the very industrial character that the U.S. Congress mandated preserved for future generations as a unit of the National Park System. This is neither good historic preservation management nor approved management practices for a unit of the National Park System.

Criteria for determining adverse effects under Section 106 are quite specific as defined in 36 CFR Part 800.5. 800.5 also requires such actions to meet the appropriate Secretary of the Interior’s “Standards for the Treatment of Historic Properties” (36 CFR part 68). Few Plan alternatives appear to meet the Secretary’s “Standards” nor, for that matter, the NPS administrative requirements of NPS-28: Cultural Resource Management Guideline.

Among the more concerning aspects are:

- Widening and resurfacing the historic dirt, mule towpaths thereby creating an appearance with no historic basis or precedent. Arguably, the water-filled canal itself and the towpaths are the two dominant and emblematic historic Canal remnants. The proposed towpath treatment turns them into something for which there is no historic basis and creates a false, overly-designed, historically-inappropriate appearance;
- Proposed new masonry construction throughout the Project Area for stairs, retaining walls, revetments, plazas, etc. appears in the renderings indistinguishable from the surviving, historic stone and brick masonry. This is contrary to NPS policies and professional historic preservation practices. There must be a clear distinction between historic material and new construction;
- The introduction of recreational boardwalks and patios is incompatible in material, design, and historic character use with the National Historic Landmark. While limited adaptive reuse and new additions within historic context are, of course, generally welcomed, the Plan proposals appear so pervasive as to have a negative impact on the overall historic character of the Canal; and,
- Widespread use of landscape perennial borders throughout the Project Area is inappropriate. Historically, The C&O Canal was neither a garden nor a recreational park. The proposed introduction of so many herbaceous borders, while undoubtedly popular and attractive, imposes a “vocabulary” and creates an appearance incompatible and, arguably, wholly out of the Canal’s historic character.

Acquired by the federal government from the B&O Railroad in 1938, designated a National Monument in 1961 by President Eisenhower, and brought into the National Park System in January 1971 by President Nixon, the 184.5-mile, Chesapeake and Ohio National Historical Park is, by statutory definition, **nationally significant**; its historic constituent properties and (importantly) historic character are nationally significant and are highest priority for protection – arguably none more than the Georgetown segment. We raise this given media coverage and discussions during recent consultation comparing favorably the Plan with the highly-popular New York City High Line. While both historic properties are remnants of America’s industrial heritage, there are significant and important differences which are being ignored in the current Plan and that call for widely different preservation/ adaptive reuse approaches.

As a **locally-significant** New York City historic property, greater latitude in rehabilitating the High Line was afforded that resulted in using the industrial remnants largely as a popular stage setting for innovative landscape designs and recreation. Here, historic preservation was not a primary driver or concern. In the case of the **nationally-significant** C&O Canal National Historical Park, historic preservation must be – given its national park status. Regrettably, it does not appear to be the case as evidenced by many aspects of the Plan.

We are very troubled by the proposed plan – particularly as the National Park Service appears to be an advocate and co-sponsor. The ideas underlying the various design alternatives show a disregard for the Service’s statutory and regulatory management responsibilities. A concept

plan that respects better the C&O Canal's history, the National Park Service, Congressional intention, and the nation's history is required.

I attach a compilation of addition comments or questions that provide greater detail of the points made above. If you have questions or require additional information, please do not hesitate to contact me.

Sincerely,



Stephen A. Hansen, Chair  
Committee of 100 on the Federal City

Attachment

cc: Robert Vogel, RD,NCR, NPS [Bob\\_Vogel@nps.gov](mailto:Bob_Vogel@nps.gov)  
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## ATTACHMENT

### COMMITTEE OF 100 ON THE FEDERAL CITY COMMENTS/ QUESTIONS – C&O CANAL CONCEPT PLAN

#### EVALUATING THE DIFFERENT SECTIONS OF THE CANAL

The *Georgetown Canal Plan* divides the Canal between the Aqueduct on the west and the Zero Milestone on the east into eight sections. These sections have been used below to make comments, ask questions, etc. While the Canal Plan provides graphics and some text for each section, considerably more information is needed on existing conditions, what is proposed, and the reasons for the new proposals. It is important to be able to understand the existing conditions in each section, and what is proposed. In future reports, the Plan maps should be “continuous”, rather than the present arrangement where in some cases there are small gaps between different sections.

#### Towpaths and Mule Routes

The design of tow paths along the Canal is a critical issue and at least three alternative designs are proposed in the Canal Plan. This matter needs major consideration since a major alteration of the tow paths will affect the historic character of the Canal.

The span of the canal running from Georgetown to Harper’s Ferry consisted of a 16’-wide earthen bank, narrowing to a 12’-wide towpath on top along the river side of the canal. An earthen berm to contain the other bank of the canal provided a 7’-wide path on the top (see Figure 1).

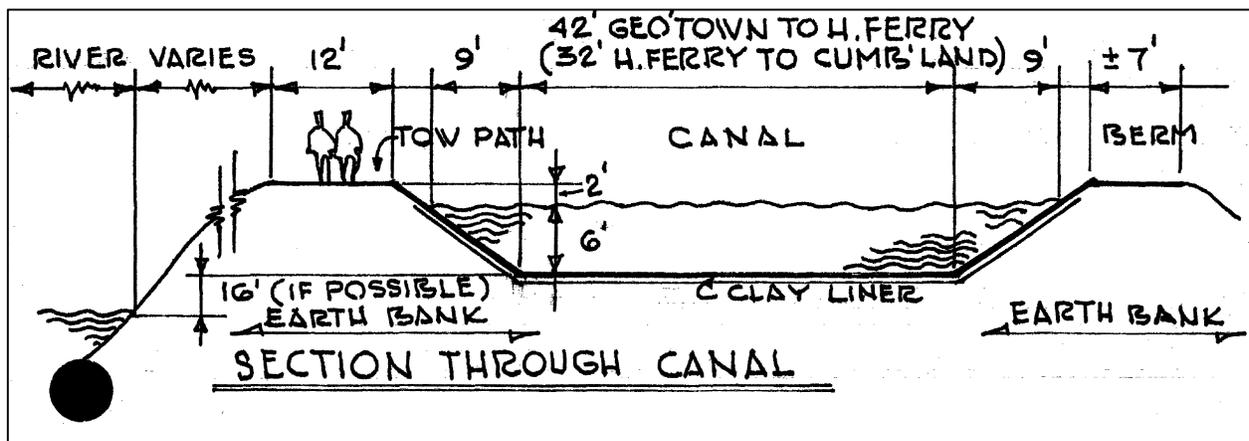


Figure 1. Cross section of the C&O Canal through Georgetown (National Register nomination, 1979).

From Georgetown to the Alexandria Aqueduct, a specified 12' towpath was on the berm (land side) of the canal, and at that point a bridge afforded access to the towpath on the river side of the canal for all the remaining miles. Throughout parts of Georgetown, over time stone walls and foundations abutted and/or encroached on the towpath, creating narrower traffic areas.

Obviously, some repairs, changes and improvements could be made to improve the use and safety of these walkways. However, some of the proposed improvements would appear to have a serious adverse impact on the historical character of the Canal.

The proposed Alternative A, while keeping the existing towpath width, proposes to add new material on top of the existing canal wall to stabilize it, as well level the path and resurfacing it (see Secretary of the Interior's *Treatment of Historic Properties* ("Treatment") Standards 5 and 6 and Rehabilitation Standards 6 and 9). Alternative B proposes applying a cantilevered edge over the canal wall, covering it, and extending the walkway over the canal itself. Both Alternatives A and C would alter the historic spatial relationship between the canal and towpath and make it impossible to distinguish the old from the new (see Secretary of the Interior's *Standards for Rehabilitation* ("Rehabilitation"), Standard 9). Alternative C proposes to widen the towpath by moving the wall further into the historic canal, thus narrowing the canal – a modification that would be irreversible (*Rehabilitation* Standard 10).

The towpath was specified to have a smooth, hard surface and surfacing was of crushed rock or whatever was available in the immediate area. This would have been either gravel, crushed stones ("Macadamized"), or simply dirt. Resurfacing the towpath with concrete or another material, as well extending the width of the path with what appears to be either granite or concrete slabs is introducing historically inappropriate materials.

The vegetative growth on top of the canal walls should not be ignored. It is a naturally occurring feature and undoubtedly appeared soon after the canal was opened in Georgetown. It is a feature of the canal landscape through Georgetown and has gained historic significance (see *Treatment* Standards 4 and 5). It also provides a natural safety function by delineating the area between the towpath and the edge of the canal walls.

Providing handicapped access is another important need that must be provided, but needs to be provided with great sensitivity.

The matter of "mule routes" along the Canal is also important. What routes will the mules follow to pull the future canal boat from "The Locks" on to the west? How far west will the canal boat be pulled (as far as the Aqueduct or beyond)? This decision has a number of influences on the design of the Canal.

### **Boardwalks**

The addition of recreational boardwalks is incompatible with the industrial historic character of the Canal, both physically and materially. We assume that these may not have wooden decking, but a synthetic wood-like material, such as Trex™ to handle weathering and traffic? Additionally, the position of these boardwalks cantilevering over the canal would obscure both its width and views of the stone canal wall underneath the boardwalk.

### **The Aqueduct**

The "Aqueduct" section of the Canal landscape extends from west of the Aqueduct to the 34<sup>th</sup> Street pedestrian bridge on the east. The key questions in this section seem to involve access to

lower levels (Capital Crescent Trail, etc.), the repair of the Aqueduct, how the Aqueduct is used, and the overall interpretation of this area. It is important for visitors to have an understanding of the use of the Aqueduct over time, the canal on the other side to Alexandria, etc. It seems clear that interpretation of this area is very important.

The one mile point on the Canal is somewhere in this area but does not seem to be clearly marked at this time. This One Mile Marker should be installed and highlighted so that visitors will have a sense of walking the first mile of the Canal (or the last mile of the Canal when walking from Cumberland).

### **The Bend**

The “Bend” section of the Canal landscape extends from the 34<sup>th</sup> Street pedestrian bridge on the west to east of the 33<sup>rd</sup> Street Bridge on the east. On the north side are the rear elevations of buildings along Cady’s Alley and there are three major buildings on the south. It is not possible from the drawings to understand what exists now and what is proposed to be added. A rendering indicates an enhanced landscape on the south side of the Canal which may well detract from the historic character of the Canal.

### **The Walls**

The “Walls” section of the Canal landscape extends from the point east of the 33rd Street Bridge to the Wisconsin Avenue Bridge. This is an especially important section of the Canal landscape. On the north, the Canal is bordered by the “Market House” (now occupied by Dean and Deluca) and the Georgetown Park complex (retail, office, residential). On the south, the Canal is bordered by the Canal House/Power Plant Building and several smaller buildings. Again, it is not possible to be sure what exists today and what is proposed.

The walls are a record of how the canal has evolved over time and need to be examined within this context. While the walls are not included as contributing elements to the historic canal in the National Register nomination, they have gained significance over time and contribute strongly to the historic and present character of the canal (see *Treatment* Standard 4).

The relationship of many of the walls to the canal is in part functional, helping to contain canal flooding, protecting abutting structures from flood damage, as well as providing foundations for buildings themselves. In many places, their height emphasizes the change in terrain towards the river and the depth of the canal. This “canyon effect” is both geographical and an historically-defining characteristic of the canal through Georgetown.

One proposed change (Alternative B) is a wide staircase from in back of the Dean and Deluca building stepping down to an intermediate level overlooking the Canal. This “dramatic” change is a major change from the more historical nature of the Canal in this section that exists today and certainly has to be viewed with caution. This type of “improvement” will have a serious adverse effect on the historic character of the Canal.

Also, proposals in both Alternatives A and B assume the removal of the entrance to the ramp that runs behind Dean & DeLuca into the Georgetown Park parking garage. With the removal of this ramp, how would the parking garage be accessed?

Further east, adjacent to the Wisconsin Avenue Bridge over the Canal, Alternatives A and B propose a “Wisconsin Cutout and Catwalk”. Unfortunately, neither the renderings, the plans or any descriptive text make it possible to understand what is being proposed

### **The Grove**

“The Grove” section of the Canal landscape is a two-block section from the Wisconsin Avenue Bridge to the Thomas Jefferson Street Bridge. Changes appear to be relatively limited but, again, the graphics and “text” do not provide a clear idea of what is being proposed.

### **The Locks**

“The Locks” section of the Canal landscape is a two-block section from Thomas Jefferson Street to 29<sup>th</sup> Street. The key first block section extends from Thomas Jefferson Street to 30<sup>th</sup> Street. This is the section of the Canal which is now closed off and undergoing massive reconstruction.

Again, the graphics, text and renderings fail to adequately indicate existing conditions and what is being proposed. Questions about two proposals should be noted. First, on the north side of the Canal between Thomas Jefferson Street to 30<sup>th</sup> Street, there is a park and “mule yard” indicated on what we understand is now Park Service property. On the drawing, the park appears very formal, with one part indicated as a mule yard. The mule yard would be very important and would appear to provide a certain sense (and perhaps smell) to this area. This does raise certain questions. Are the mules kept in a stable here overnight, or are they “trucked in” in the morning from somewhere else and “trucked out” at night. See questions below about the mules and the mule paths.

The second big question concerns the indication of a “Comprehensive New Visitor Center” in the historic Foundry Building on the south side of the Canal (the historic building is part of the larger “Foundry Building” complex. Having such a Visitor Center with adequate space for exhibits and orientation by National Park Service staff is very desirable. More information is needed about funding, how this would be obtained, etc.

### **Rock Creek Confluence, Rock Creek Park and Mile Marker ‘0’**

The last three sections of the Canal landscape involve the Canal extending east from 29<sup>th</sup> Street to Rock Creek Park and then turning south around the West Heating Plant and extending on south to the Zero Milestone. There are questions about how to make this connection and several alternatives are shown. Further elaboration of these alternatives is necessary and, of course, eventually there will need to be discussion of the costs involved.

The character of the Zero Milestone area needs attention. Alternative A for example shows a very formal arrangement. It would seem desirable to have a more informal setting for the Zero Milestone, such as exists at present.

How to reach the Zero Milestone also needs attention. The present route in front of Thompson Boathouse has problems. Alternative A shows a path in back of the Thompson Boathouse. These access issues need to be explored more.

Finally, it is appropriate to note that the Committee of 100 on the Federal City has long championed completion of the “Washington Waterfront Walk”, the 11-mile walk and bike path from Georgetown to the National Arboretum. This concept was proposed in the 1997 Legacy Plan outlined by the National Capital Planning Commission. Now, 20 years later, much of path is in place, with only two major gaps to be filled in. It is important to consider how this path will connect with the C&O Canal in Georgetown, with the Georgetown waterfront (including Washington Harbor) and with other sections of Georgetown. This is a larger issue but it should be addressed as part of the Georgetown Canal Study.

Name: Taj Schottland, Program Manager at The Trust for Public Land

Location: Washington, DC

Email: [taj.schottland@tpl.org](mailto:taj.schottland@tpl.org)

Comments:

At the Trust for Public Land, we believe everyone deserves to live within a 10-minute walk of a high-quality park. Park and open space planning should emphasize providing equitable access to high-quality parks for all residents, particularly in historically underserved neighborhoods. Principles of equity and access should be included and highlighted prominently throughout this Parks & Open Space Element. While we generally support all suggestions of the plan, we strongly support POS.C.2 as removing barriers to access to existing parks can be key in meeting the 10-minute walk goal. In addition, a strong, interconnected system of trails for biking and other nonmotorized transportation is vital to connect people with parks and to offer alternatives to driving. The Trust for Public Land has been active with partners on this issue in the Washington Metro area. Therefore, we strongly support POS.C.7.

We are pleased to see the inclusion of multiple benefit green infrastructure in sections B and C. Green infrastructure in and around parks can be a cost effective approach to reducing flooding, minimizing urban heat island impacts, and improving water and air quality at the local and neighborhood scale. It is also important to note that if thoughtfully designed and maintained, waterfront parks can serve as open-space buffers against riverine flooding caused by sea level rise and a potential increase in storm frequency and severity. Climate change should be considered in all open space planning, but it is especially important when designing resilient waterfront parks. With this in mind, the Trust for Public Land strongly supports POSB.10 and POSB.12 as being particularly relevant.

May 7, 2018

Surina Singh  
National Capital Planning Commission  
401 9<sup>th</sup> Street NW  
Washington, D.C. 20004

Re: Comments on the Draft Parks & Open Space Element of the Federal Comprehensive Plan

Dear Surina Singh,

Casey Trees is a Washington DC-based nonprofit with a mission “to restore, enhance and protect the tree canopy of the nation’s capital.” To fulfill this mission, we plant trees; monitor Washington, D.C.’s tree canopy; and work with elected officials, planners, and residents to prioritize trees. We are dedicated to helping the District meet its 40 percent tree canopy goal by 2032 – an achievable goal only if existing trees are protected and agencies like the National Capital Planning Commission (the commission) adopt policies that grow the city’s urban forest.

We recognize the importance of parks and green spaces as the national capital region prepares for denser development, heavy rainfall and flooding, and extreme temperatures in the coming decades. Our city’s parks and natural features, including the trees that cover about 72% of these spaces, provide a wide array of benefits to people and wildlife. Green spaces offer a sense of place and essential life-enhancing qualities that aid community and individual well-being (Figure 1).

With the update to the Parks & Open Space Element of the Federal Comprehensive Plan, the commission has an opportunity to create robust policies that lead to greener and more inviting tree-filled parks that benefit our regional community. Integrating the below recommendations into the Parks & Open Space Element will ensure “a cohesive vision for parks and open space in the region through improved stewardship, utilization, maintenance, planning, and design.” **In particular, our comments focus on restoring and maintaining the urban forest, creating natural shoreline buffers, and protecting trees and soil from development.**

Section B: Provide Stewardship of Natural and Cultural Resources

- **POS.B.3** Protect and maintain greenways, **potentially including Frederick Law Olmsted Sr.’s historic greenways in the District**, for their environmental benefits and as natural and cultural resources
- **POS.B.4** Protect and preserve **small forests all forested** and stream valley parks as natural resource areas, so they continue to serve as valuable scenic, ecological, **educational**, cultural, and recreational resources.
- **POS.B.5** Encourage **the use of parks, trees, and natural areas as** gradual transitions from the natural areas surrounding the terrain features to densely developed urban environments.
- **POS.B.9** Encourage land use and actions that protect and improve the Potomac and Anacostia Rivers, **and require** natural shorelines to enhance their ecological quality and scenic character.



- **POS.B.10** Retain and restore natural shoreline areas to a more natural state, including daylighting streams and planting trees/vegetation to provide more sustainable and resilient conditions.
- **POS.B.12** Treat urban shoreline areas to be resilient and adaptable to variations in water level. Opt for natural shoreline buffers and avoid hardscape to reduce flooding.
- **POS.B.14** Preserve and maintain trees, vegetation, and natural areas and open space on federal campuses that support wildlife habitat, improve scenic quality, and enhance aesthetic character. Preservation of these spaces should be compatible with the campus mission and programmatic needs.
  - *This policy consolidates two previous policies from the 2004 Element which were intended to maintain and conserve trees. We urge the commission to specify in policy POS.B.14 that trees and wooded areas, in particular, should be preserved and maintained.*
- **POS.B.15** Increase and conserve urban tree canopy, understory plantings, and landscape cover through best design and installation practices, potentially including Low Impact Development (LID) techniques, maintenance plans, and soil remediation efforts, to provide long-term aesthetics and environmental benefits.
- **POS.B.16** Protect and maintain large tree preserves, forests, and mature urban trees when planning and designing development projects in the region. Incorporate new trees as part of all public development, especially in the District, to help restore the historic green city setting of the National Capital Region.
  - *We recommend the commission re-incorporate Policy 9 of the Greenways and Greenbelts section in the 2004 Element, with some minor edits, to make it clear that trees should be planted as well as protected.*
- **POS.B.20** Preserve and protect the park-like character and setting of the region by planting native and urban hearty trees and vegetation to promote sustainable practices and minimize maintenance requirements.
- **POS.B.21** Consider Implement partnership opportunities with local non-profits to educate and engage communities in the cleanup, planting, removal of invasive species, and maintenance of the region's rivers, trails, parks, and open space.

#### Section C: Provide Access to and Connections between Parks and Open Space

- **POS.C.1** Plan and maintain connections between parks and open space through streets, sidewalks, plazas, and trails to create a unified and accessible landscaped park system for the national capital region.
- **POS.C.4** Link open space along the Potomac and Anacostia shorelines to provide a continuous public open space system that creates natural shoreline buffers and recreation opportunities, avoids hardscape, and reduces flooding.

#### Section D: Balance Multiple Uses Within Parks

- **POS.D.5** Minimize impacts from development adjacent to parks, open space, and viable soil, including trails and parkways, to protect their natural and historic features.

- **POS.D.6** Maintain and improve **vegetation along** the Anacostia Riverwalk Trail in coordination with the local government as a regional resource that provides multiple recreational opportunities. **Protect the Anacostia Riverwalk Trail from the impacts of adjacent development.**

Section F: Build Partnerships and Coordination among Multiple Landowners and Jurisdictions

- **POS.F.1** Use **conservation** easements, donations, purchases, exchanges, or other means to create, expand, and enhance a cohesive park and open space system.
- **POS.F.2** Develop partnerships and build coalitions among local agencies, non-profit organizations, educational institutions, foundations, and other stakeholders to create, manage, maintain, **preserve**, and connect a cohesive open space system.
- **POS.F.6** Develop federal and local collaborative relationships to maximize the functionality of small parks as **well-maintained** local neighborhood **amenities green spaces**.
- **POS.F.7** Coordinate with responsible agencies and local jurisdictions to **minimize prevent** physical and visual impacts of development projects on the regional park and open space system, including natural features and viewsheds.

Thank you for the opportunity to comment. Casey Trees would be happy to work with you to provide tree-related analyses or information for the Parks & Open Space Element. If you have any questions about these recommendations, please feel free to contact me at [ktaddei@caseytrees.org](mailto:ktaddei@caseytrees.org).

Sincerely,



Kristin D. Taddei  
Planning Advocate



**Figure 1.** Tree canopy covers about 72% of federal parkland in Washington, D.C., Arlington County, Fairfax County, Montgomery County, and Prince George’s County. Data is unavailable for Loudon and Prince Williams Country.



420 10th Street, SE Washington, DC 20003

Surina Singh, Project Director  
Attn: Comprehensive Plan Public Comment  
National Capital Planning Commission  
401 9th Street, NW, Suite 500N  
Washington, DC 20004

[surina.singh@ncpc.gov](mailto:surina.singh@ncpc.gov)

April 18, 2018

Subject: Comprehensive Plan for the National Capital: Federal Elements - Parks & Open Space Element

Dear Ms. Singh:

The Capitol Hill Restoration Society (CHRS) is the largest civic organization on Capitol Hill. For over 60 years CHRS has advocated for the welfare of the Capitol Hill community, including sound land use planning and protection of parks and the environment. We appreciate the Commission's leadership on preserving federal parks and open space and are honored to submit comments on the draft Parks & Open Space Element, arranged in order as they appear in the Element:

**Stewardship Opportunities** (pp. 21-25)

Preservation of waterfront open space

As a result of the stewardship by the National Park Service(NPS), incredible natural resources of waterfront and open space have been preserved in the District of Columbia. NPS has been able to prevent private development of these lands through its ownership/ control of these public lands in the District, including both shores of the Anacostia River waterfront and large sections of the Potomac River waterfront and much of the lands adjacent. Once waterfront land is used for private residential, commercial or institutional uses, it will be lost forever as a valuable natural resource capable of being enjoyed by all.

There should be no further transfer of federal park land to the District of Columbia government. The District has been a poor steward of land transferred from the federal government. After the District obtained title to Reservation 13 (DC General campus), it did adopt a master plan and zoning through a public process, but then ignored its own rules and offered the property for a Redskins training center and more recently, for Amazon's HQ2.<sup>1</sup> After acquiring historic Boathouse Row on the Anacostia River in 2008, the District advocated pushing city streets through a sensitive natural resource area. Based on the District's poor track record, we urge that no additional federal park land be transferred to the District, and NPS's stewardship of these lands should continue. We suggest adding new POS.B.19 on page 25:

**new POS. B. 19. The National Park Service should continue to own/control and preserve all of the open space federal parkland, including the Stadium Armory area, along the north and south shores of the Anacostia River.** [suggested changes in bold]

Similarly, we suggest a new POS.C.11 on p. 32:

**new POS. C.11: On NPS-controlled property no non-park or non-water dependent use is permitted within 600 feet of the Anacostia highwater mark.** [suggested changes in bold]

#### Roads (p. 22)

The Element calls for protecting ecologically sensitive areas from the impacts of development. EventsDC has joined the DC Department of Transportation to suggest building a commuter road (the "Park Drive") through a natural habitat area in federal parkland along the west side of the Anacostia River from Benning Road to Barney Circle. Please see Figure 1. The road would block access to the waterfront and to the Anacostia Riverwalk Trail, and in one area, would be directly next to the trail, endangering pedestrians and cyclists moving to and from the trail through Capitol Hill. In addition --

- The proposed road is in a 100-year floodplain. No road should be even built here.<sup>2</sup>
- This is a natural resource area and roads are a danger to wildlife; roads reduce habitat connectivity, are an impediment to dispersal and foraging, and are a source of polluted stormwater runoff.<sup>3</sup>

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<sup>1</sup> Jonathan O'Donnell, "D.C.'s pitch to Amazon focuses on 4 hot neighborhoods," *Washington Post*, 17 Oct. 2017, A-14.

<sup>2</sup> DOEE, "Vulnerability & Risk Assessment: Climate Change Adaptation Plan for the District of Columbia" (2016), Map 4 (500-year flood plain, 2080). DOEE, "Relative Sea Level Rise inundation predictions in Washington, DC for 2018, 2068, and 2100." US Army Corps of Engineers, from DOEE, "Wildlife Action Plan," 124 (2015). Present-day Storm Surge From Category 1, 2, and 3 Storms. DOEE, "Climate Ready DC," 4.

New or expanded roads should only be built if there is a compelling reason and no other alternative. For these reasons, we suggest a change to POS.B.11 on p. 24:

POS.B.11 Discourage **new or expanded roads** and paved parking areas along the shoreline of rivers, streams, and at waterfront parks. Remove existing parking when feasible and restore those areas to a landscaped condition, which could include recreational uses. [suggested changes in bold]

Minimizing effects of light pollution on wildlife (p. 22).

The Federal Environment Element does not specifically address the effects of light pollution on wildlife. pp. 18, 20. We suggest that the Parks and Open Space Element add goals to reduce light pollution. Light pollution not only causes bird collisions with buildings, it attracts birds into urban areas and away from forested areas with more abundant food sources. In January 2018, American Bird Conservancy's collisions@lists.abcbirds.org noted:

Recent papers ... now confirm what has long been surmised: urban glow attracts birds towards the built environment. This applies primarily to migrating songbirds, found in unexpectedly high densities in areas lit at night. These birds are not circling and crashing into buildings, but as they stop over in these areas, they are vulnerable to collisions with glass, predation by cats and other unintended consequences of urban life. [emphasis added]

Most birds migrate at night through increasingly light-polluted skies. Bright light sources can attract airborne migrants and lead to collisions with structures, but might also influence selection of migratory stopover habitat and thereby acquisition of food resources. We demonstrate, using multi-year weather radar measurements of nocturnal migrants across the northeastern U.S., that autumnal migrant stopover density increased at regional scales with proximity to the brightest areas, but decreased within

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future.com..DOEE, Wildlife Action Plan, (2015), p. 95. Table 16 IUCN Hierarchy of Conservation Threats and TRACS Action Drivers in the District.

a few kilometers of brightly-lit sources. This finding implies broad-scale attraction to artificial light while airborne, impeding selection for extensive forest habitat. Given that high-quality stopover habitat is critical to successful migration, and hindrances during migration can decrease fitness, artificial lights present a potentially heightened conservation concern for migratory bird populations.<sup>4</sup>

To insure that the lighting satisfies the most rigorous dark sky standards, we suggest that the Element specify that all new and replacement lighting fixtures on federal buildings meet the standards for a seal of approval from the International Dark-Sky Association (IDA). Fixtures approved by IDA employ warm-toned (3000 K or lower) white light sources or employ amber light sources or filtered LED light sources, are full-shielded, emit no light above the horizontal plane, have no sag or drop lenses, side light panels, or uplight panels, etc. For this reason we suggest a new POS.B.19 on p. 25:

**new POS.B.19. Minimize light pollutions by requiring that all new and replacement lighting fixtures on federal buildings meet the standards for a seal of approval from the International Dark-Sky Association.**  
[suggested changes in bold]

#### **Parkways as Scenic Routes** (pp. 34-36)

As noted on p. 34, "visual and physical encroachment on and adjacent to parkways is an important challenge threatening the scenic and pastoral qualities of parkways ... ." Maintaining an open space along riverfront parkways will contribute to preserving parkway viewsheds. For this reason we suggest a new POS.D.8 on p. 36:

**new POS.D. 8. An open space parkland at least 600 feet wide along the entire north shore of the Anacostia River should be developed/required.** [suggested changes in bold]

#### **Balance Multiple Uses Within Parks** (pp. 33-36)

This section advocates "programming that supports recreation, education, commemoration, and special events while protecting natural and cultural resources." POS. D.2, p. 36. There is a documented need for additional recreation space, and we urge that the RFK Stadium property, owned by NPS and leased to District government, be developed to maximize recreation space, and minimize parking and other non-recreation uses. CapitalSpace (2010).

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<sup>4</sup> McLaren, J. D., Buler, J. J., Schreckengost, T., Smolinsky, J. A., Boone, M., Emiel van Loon, E., Dawson, D. K. and Walters, E. L. (2018). Artificial light at night confounds broad-scale habitat use by migrating birds. *Ecol Lett.* doi:10.1111/ele.12902.

Thank you for considering our comments. For questions or additional information please contact CHRS at 202 543-0425 or email to [info@chrs.org](mailto:info@chrs.org).

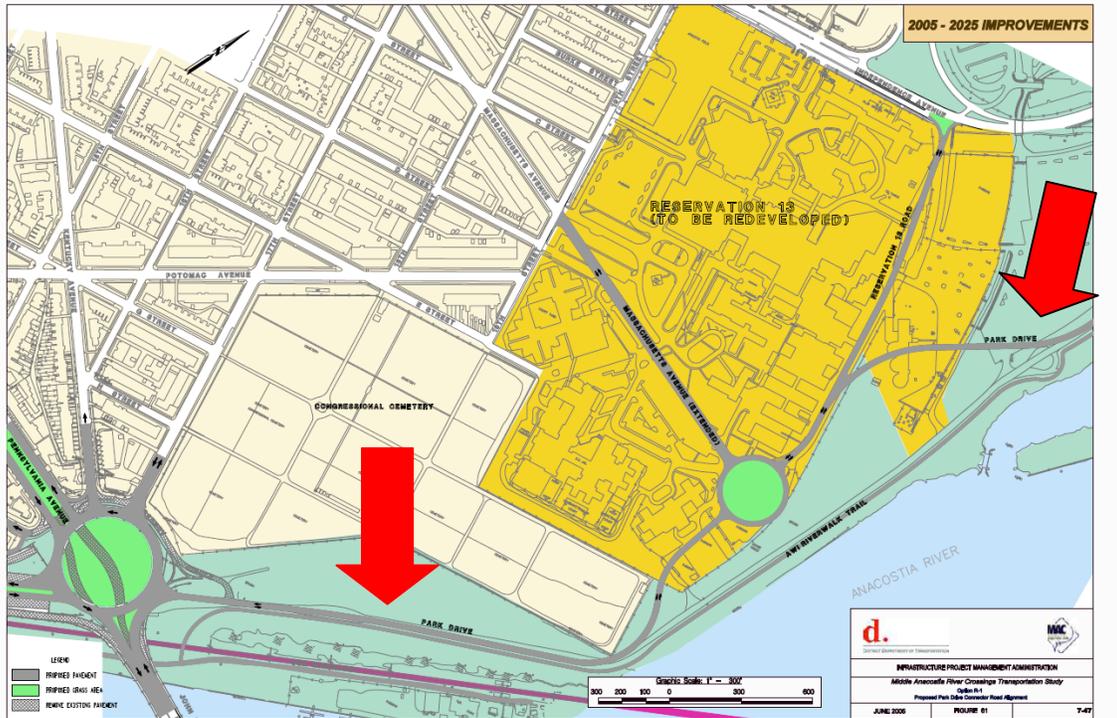
Sincerely,

A handwritten signature in black ink on a light yellow background. The signature is cursive and appears to read "Elizabeth Nelson".

Elizabeth Nelson, President

cc: Councilmember Charles Allen email: [callen@dccouncil.us](mailto:callen@dccouncil.us)

Figure 1. Proposed route of the "Park Drive" along the west bank of the Anacostia River from Benning Road to Barney Circle. DDOT, Middle Anacostia Crossings Study (2005), " p. 7-1 (2005). Red arrows point to the "Park Drive."



Name: Alex Block  
Location: Washington

Comments:

Thank you for the opportunity to comment on the draft update to the Parks and Open Space Element of the Washington's Comprehensive Plan. As you know, successful parks are critical to the success of the city as a whole.

In order for Washington's urban parks to thrive it would be helpful for the Comprehensive Plan to acknowledge that urban parks need a different set of management strategies than most of the parks under National Park Service management. The Comprehensive Plan should explicitly note the need for a separate set of rules and regulations for successful urban park management.

While Downtown's parks are a welcome bit of green space amidst the city, they should not be conceptualized as purely natural spaces. Urban parks need strong programming. Elements such as the sale of food and beverage, commercial sponsorship of events and activities should be allowed and encouraged when supported with a strong management plan.

Sustainable management and governance of urban parks requires innovative partnerships, and these partners must be able to generate revenues to support park programming goals. The DowntownDC BID is currently partnering with both the District Government as well as the National Park Service to pilot this kind of management partnership for Franklin Park. It's a model we'd like to apply to other federal parks and open spaces in the future.

Thank you for the opportunity to comment.

Sincerely,

Alex Block  
Infrastructure and Planning Manager  
DowntownDC Business Improvement District

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Name: Georgetown BID  
Location: Georgetown DC

Comments:

Georgetown BID comments on the NCPD Parks and Open Space Element Update

The Georgetown Business Improvement District (GBID) supports the differentiation of micro-parks (<1/2 or 1 acre) from "small parks" to streamline permitting and maintenance of these neighborhood parks. In many cases in Georgetown and throughout the District, these small parks present very little opportunity for commemoration or protection of cultural resources, but are important community spaces for neighborhoods. NPS often lacks the sufficient resources to maintain these parks.

More broadly, we encourage NCPD to provide more guidance for NPS to engage in partnerships and/or cooperative management agreements for all its park assets within the National Capital Region, similar to the one for Franklin Park. Such partnerships or cooperative management agreements can bring greater

activity, amenities, and management to NPS assets while maintaining space for commemoration and protecting cultural resources. These activities and amenities include important goals for park use, including vending, bike racks, seating, exercise classes, community events, permanent restrooms, and signage.

Transportation: We strongly encourage NPS to consider transit infrastructure which touches or utilizes parklands within the National Capitol Region. With the NPS holdings including long, unbroken tracts of land, the linear nature of all forms of transit necessarily will necessarily conflict with a hard and fast position against considering such projects. Some level of understanding and coordination should be included in the open space element. (examples: Potomac Yard Metro, Georgetown Gondola, Potomac River Taxi)

Safety & Security: Direction regarding the design of permanent and temporary safety barriers between vehicle and pedestrian space should be clarified in this plan, as threats to cities and public spaces have evolved, and there are newer options for the design of barricades, planters, bollards, and other protective barriers.

THANK YOU - This update is ambitious, forward-thinking and necessary! Thank you for your expertise, thoughtfulness and effort coordinating it. GBID appreciates the emphasis on expanding park uses and recreational opportunities to balance commemorative places.

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Name: Galin Brooks on behalf of Robin-Eve Jasper

Location: Washington, DC

Comments:

To Whom it May Concern:

On behalf of the NoMa Business Improvement District (NoMa BID) and NoMa Parks Foundation (NPF), I am writing to submit comments on the National Capitol Planning Commission's (NCPC) March 1, 2018 Draft Parks & Open Space Element (the Draft Element). We commend NCPC for the forward-thinking approach to balancing local and federal interests in the National Capitol Region (NCR) and we support the Guiding Principles laid out in the Draft Element. We respectfully request, however, that a more intentional and nuanced treatment be provided for the hundreds of triangle reservations throughout the District of Columbia.

The federal triangles created as a result of the L'Enfant plan are frequently less than a few hundred square feet and sit at the intersection of busy roads, appearing as small, unimproved traffic islands. If given their own category, the triangle reservations could serve to enhance the NCR's parks and open space system, by improving the street grid and pedestrian circulation, connecting adjacent neighborhoods, preserving an appealing visual character and preserving reciprocal vistas. (See page 8 of the Draft Element.) Without such a focused treatment, many of the more general provisions could be applied in a way that would inhibit the improvement of these very small parcels to the detriment of neighborhoods and residents seeking to make modest changes that respond to resident needs and contemporary interests. Significantly, these triangles are often neglected spaces in the urban fabric, suffering from lack of maintenance and lending a forlorn, "no man's land" character in their host communities. We find ample statements of principle throughout the Draft Element that would support and inform a thoughtful approach to temporary and permanent improvements to federal triangles that

would assure that they become or remain an asset in their host neighborhoods. Proposed language implementing that

Thank you for your consideration of this request. Please feel free to contact me directly if you have any questions or would like to discuss further. And, thank you for your time and attention to improving connectivity, parks and green space in the NCR.

Sincerely,

Robin-Eve Jasper  
President,  
NoMa Business Improvement District  
NoMa Parks Foundation

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## Comments from Interested Individuals

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*(This section includes comments submitted through the online portal and handwritten comments, at the public open houses, which were transcribed by NCPC staff)*

May 7, 2018

To: NCPS, submitted online May 7, 2018.

Re: Comments for The NCPC Comprehensive Plan "Parks and Open Space Element" Draft dated March 1, 2018

Thank you for the opportunity to submit my comments for this very important document. My overall focus will be on the aspects that touch on the natural and recreational environment provided by the Anacostia River and NCPS's role and impact on the future of this resource. I will try to note specific pages where possible, but there are a few overall general comments as well.

"Parks and Open Space Element" Draft

1. Page 6: I applaud the recognition that parks are interconnected in a system of open spaces. This holistic view is essential to understanding how natural systems work, which usually ignore political boundaries. The watershed traverses topography and creates a "transect" of ecology which is sensitive to disturbance. What happens up stream must be connected in our management strategy to what occurs downstream.
2. Page 7: While it is good to commit to building partnerships across jurisdictions, this paragraph is relatively vague about how do we do this. This section begins to talk about reaching out to stakeholders, but stops short of outlining specific strategies that can be utilized to improve communication. We can't just wish this happens, we need to know what real tools can be mobilized.
3. Page 18: Greenways need to be managed as local native landscapes to have the most value. Many of these are planted in an ornamental way and do not provide the habitat, resilience and water managing capacity we want and need them to perform.
4. Page 20 and 23: While this mentions Anacostia Park, this reference does not include the Maryland location of Bladensburg Waterfront Park as an important contributor to the Anacostia River System. The Anacostia Waterfront Initiative Framework Plan (2003) stopped at the Washington D.C. border. Thus it set up a scenario to neglect consideration of planning impacts on the adjacent Bladensburg Waterfront Park in Maryland. Users move across the D.C. line on the riverway, and thus stakeholders are shared by both jurisdictions and must be included in the planning policies. This relates back to my comment on page 6.
5. Page 44: While stating that protecting view sheds is important, the second paragraph does not get into the specific of how it will be done. Will the natural context dictate the aesthetics, or will we just settle for the most "cost effective" solution, with the excuse of budget being our overriding decision maker. Aesthetic decisions affect stakeholders and they need opportunity to weigh in on decisions concerning impact to the natural view shed. Quality architectural solutions for structures developed in the natural environment is paramount.

6. General comment: We need to promote many more activities that tie together neighborhoods, while educating youth about the natural environment. How will the policies of NCPS increase available sources of grants, funding etc. for this important need? We currently spend 90% of our time indoors, and because of this, many children grow up unaware of the natural processes and hydrologic cycles that occur outdoors. If they don't understand these, they will not understand how important stewardship of our resources is.

#### Summary of modifications to policies

1. Parks and Landscape, page 111: pedestrian users are specifically mentioned, but other "multimodal" users should be mentioned specifically, including users of the waterway. Bicyclists, rowers and recreational boaters should be added to the notes.
2. Rivers and Waterways, page 121: This is a general comment on the ability of NPS to restore/reverse areas that are under Army Corp of Engineers purview. Much upstream urban watersheds are channelized in concrete ditches, pipes and impervious embankments. How will NPS be able to improve this "flood control" which is essential to providing improvements downstream? Often these interests are at odds with each other and no progress is possible.

Thank you for allowing me to provide these comments. While not an environmental specialist, I am an avid rower and daily user of the Anacostia River. I am also a high school rowing coach and embrace the opportunities to educate youth about both the benefits of a health body and a health environment. I see these as inextricably linked in building quality lives for all.

Respectfully,

Loreen Arnold AIA LEED AP  
Blair Crew Coach  
Masters Competitive Rower, Washington Rowing School  
Registered Architect and LEED Professional

4205 Sheridan Street  
University Park, Maryland 20782  
301-908-5207  
[loreen.arnold@arnoldandarnold.net](mailto:loreen.arnold@arnoldandarnold.net)

Name: Darwina Neal  
Location: Washington

## **Comments on NCPC's proposed parks policies: Parks & Open Space Element Update**

**General Comments:** The text of the document is generally well-written, but it should be proof-read to correct spelling and eliminate grammatical errors and add clarifying punctuation, such as commas and hyphens, where apropos in hyphenated words.

For example: Correct spelling of “Olmsted” (p.14), to eliminate the “a”; correct spelling to “stream”, rather than “steam”, in several locations, and correct grammatical errors to make singular and plural subjects and verbs agree.

Also, wherever “man-made” is used, use “constructed”, which is gender-neutral, instead.

### **Summary of Modifications to Policies – Comments on Proposed Modifications**

(Note that Track changes was used to enable comparison between NCPC-proposed text and proposed changes to it.)

#### **P. 2. Expansion and Enhancement (page 103)**

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##### **1. See POS.F.2**

Develop partnerships and build alliances with local agencies, non-profit organizations, educational institutions, foundations, and other stakeholders to create, manage, and connect a cohesive [park and](#) open space system.

#### **P.5-7. Parks and Landscapes: Monumental and designed Landscape Parks (page 109)**

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##### **1. POS.A.1**

Rehabilitate, protect, and where feasible, enhance historic designed landscapes and civic streets, including squares, circles, and triangles associated with the historic [L’Enfant](#) Plan of the City of Washington.

##### **2. POS.E.4**

Within neighborhood parks, acknowledge that the site may currently serve multiple functions for residents. Scale and place memorial elements in a manner that balances existing functions [and designed landscapes](#) along with the commemorative experience.

##### **7. POS.F.7**

Coordinate with responsible agencies and local jurisdictions to minimize physical and visual impacts of development projects on the regional park and open space system, including natural [and cultural](#) features and viewsheds.

**P. 6. Parks and Landscapes: Natural Parks (page 110)**

**1-3. POS.B.4**

Protect and preserve the terrain and vegetation of forested areas ~~small forests~~ and stream valley parks as natural resource areas, so they continue to serve as valuable scenic, ecological, cultural, and recreational resources.

**P.7. Parks and Landscapes: Waterfront Parks (page 111)**

**3. POS.B.9**

Encourage land use and actions that protect and rehabilitate ~~and improve~~ the Potomac and Anacostia Rivers, including and their constructed and natural shorelines to enhance their ecological quality and scenic character.

**P.7.Parks and Landscapes: Historic Parks (page 112)**

**1. POS.A.4**

Protect and maintain historic parks as important architectural and landscape legacies of national and regional significance.

**2-4. POS.A.2**

Preserve, ~~and~~ protect and maintain historic designed landscapes, including their natural and constructed elements.

**P.8 -Terrain Features (p.115)**

**1. POS.B.1** Protect the region's natural terrain and its features, ~~features~~ including:

The ~~region's~~ rivers and streams, their associated valleys and bluffs, and the shoreline park system.

The palisades and gorges of rivers and streams, in their natural state.

The headwater and reservoir areas along the rivers.

The forested ridgelines of the topographic bowl surrounding the central city of Washington.

Other scenic and ecologically significant ~~terrain~~ features.

**2. POS.B.5**

Ensure that development does not intrude through the ridge and tree lines of natural terrain areas unless it will not impact vistas to and from those areas. (Note: Keep this original text, since the revision has a very different meaning!)

### 3. POS.F.7

Coordinate with responsible agencies and local jurisdictions to minimize physical and visual impacts of development projects on the regional park and open space system, including natural and [cultural](#) features and viewsheds.

#### 4-6. POS.B.17

When planning and designing the location of towers, antennas, or similar structures, [discourage their location](#) in or adjacent to the federal park system, [but if not possible](#):

- a) Avoid locating antennas and tower structures within the viewsheds of natural and cultural landscapes and open spaces.
- b) Encourage innovative designs that reduce the visibility of antennas and towers.

### **P. 10. Terrain Features: Topographic Bowl (page 116)**

#### UD.B.1.4

Maintain the [prominence of the](#) skyline formed by the region's natural features, particularly the topographic bowl [formed by lowland and rim features of the L'Enfant City and environs](#), and its symbolic character.

1. Visually reinforce the ~~preeminence~~ [prominence](#) of the U.S. Capitol, White House, Washington Monument, and other major nationally significant [cultural](#) resources by protecting the visual frame around them. Carefully examine the use of vertical elements within the setting of major national resources.
2. Protect the settings of major skyline elements from visual intrusions, such as antennas, water towers, and rooftop equipment, or other constructed elements.

### **P.11. Terrain Features: Palisades and Gorges (page 116)**

#### 1-2. POS.B.4

Protect and preserve [the terrain and vegetation of forested areas](#) ~~small forests~~ and stream valley parks as natural resource areas, so they continue to serve as valuable scenic, ecological, cultural, and recreational resources.

#### 3-4. POS.B.6

~~Maintain-Preserve~~ and protect the Potomac Gorge, ~~and the surrounding~~ [its related](#) palisades and gorges, and their resources, in ~~its~~ [their](#) natural condition, and keep its transition highlands, ~~the~~ rim areas, and surroundings free of intrusive constructed forms, [with a gradual transition between them and developed areas](#).

**P. 11-12. Greenways and Greenbelts (page 118)**

**1. POS.B.3**

Protect and maintain greenways [and their natural and cultural resources](#) for their environmental benefits ~~and as natural and cultural resources~~.

**2. POS.F.7**

Coordinate with responsible agencies and local jurisdictions to [where possible, expand greenways, and](#) -minimize physical and visual impacts of development projects on [natural and cultural resources and viewsheds of](#) -the regional park and open space system, ~~including~~.

**3. POS.B.15**

Increase and conserve urban tree canopy, understory plantings, and landscape cover through best [management](#), design and installation practices to provide long-term aesthetics and environmental benefits.

**4. POS.B.20**

Preserve and protect the park-like character and setting of the region by [where appropriate](#), planting native species to promote sustainable practices and minimize maintenance requirements. [\(Note: In designed parks, non-native ornamental plants can be used for maximum design effect, and in designed historic landscapes, plant materials should be replaced in-kind.\)](#)

**8. POS.B.3**

Protect and maintain greenways [and their natural and cultural resources](#) for their environmental benefits ~~and as natural and cultural resources~~.

**P.13. Rivers and Waterways (page 121)**

**1. POS.B.4** [\(See revised Terrain Features #1\)](#)

**3. POS.B.2**

Protect [and, where necessary, restore the region's unique river-related](#) features along natural shorelines, such as riparian landscapes, wetlands, steep slopes, mature/healthy trees and understory vegetation, floodplains, woodlands, and highly permeable soils.

**9. POS.B.12** – Keep original text, which is better, and add new text line to it:

In urban waterfront areas that are determined appropriate for development:

- ☐ Avoid construction in environmentally sensitive areas.
- ☐ Restore, stabilize, and/or improve and landscape degraded areas of shorelines.
- Limit development along or near the shoreline and integrate it with the generally low and continuous line of river embankments
- Treat-Design urban shoreline areas to be resilient and adaptable to variations in water level.

#### **14. POS.F.2**

Develop partnerships and build alliances with local agencies, non-profit organizations, educational institutions, foundations, and other stakeholders to create, manage, and connect a cohesive open space system on land and along shorelines and waterfronts.

#### **15. POS.B.11**

Discourage paved parking areas along the shoreline of rivers, streams and at waterfront parks. Remove existing parking when feasible and restore these areas to a landscaped condition, which could include recreational uses. Encourage use of permeable paving to replace existing paving and for new parking areas.

#### **Trails (page 124)**

#### **3. POS.C.8**

Consider opportunities to develop trails or connect trail systems when planning and designing projects throughout the region. Ensure that new development does not preclude future improvements to trail connections.

#### **New Policies**

#### **16. POS.D.7**

Develop waterfront parks that accommodate multiple uses and programming opportunities while protecting and enhancing the resilience and cultural and natural features of the waterfront.

#### **21. POS.E.6**

Locate memorial elements in a manner that is compatible ~~manner to~~with adjacent buildings, structures, landscapes and historic properties by considering existing building lines, massing, and scale. Memorial elements should complement, and not compete with, the scale of the surrounding landscape and built environment.

## 22. POS.E.7

Relate memorial landscape elements ~~with to~~ the ~~surrounding-adjacent~~ streetscape elements to create a visual ~~transition connection~~ that is responsive to the surrounding context.

## 23. POS.E.8

Improve and enhance the visual connections ~~and transitions~~ between park space, commemorative elements, and the surrounding environment.

## 24. POS.E.9

Plan circulation routes that ~~accommodate visitors or passers-by, and meet ADA requirements connect to connect the memorial and park space to-with~~ the ~~surrounding-adjacent~~ transportation network, ~~accommodate visitors or passers-by, and meet ADA requirements to the memorial and park space.~~

## 25. POS.E.10

Support innovative programming and events within commemorative settings, ~~while-with~~ ~~minimizing-minimal~~ impacts on cultural and natural resources ~~or-and~~ the visitor experience.

## 26. POS.E.11

Support the installation of temporary memorials or artwork ~~with minimal impacts while~~ ~~minimizing impacts~~ on cultural and natural resources and visitor use.

## 28. POS.F.4

Balance the national significance of parks with federal and local interests and the need to accommodate a range of uses and events ~~without adversely impacting natural and cultural resources.~~

## 29. POS.F.6

Develop federal and local collaborative relationships to maximize the functionality of small parks as local neighborhood amenities ~~without adversely impacting natural and cultural resources.~~

## 30. POS.F.8

Coordinate with responsible agencies and local jurisdictions during redevelopment projects to encourage ~~adding~~ new areas of parks and open ~~space-space, as well as preservation of existing parks. preservation.~~

Name: Loretta Neumann

Location: Washington

Comments:

I attended one of the open houses for the Parks & Open Space element of the Comprehensive Plan, but have not had time to respond to the draft in depth. I just want to reiterate the importance of the Civil War Defenses of Washington (CWDW)/Fort Circle Parks. These are not only extremely significant cultural and historical resources, but also beautiful landscapes, natural resources, and public parks. Unfortunately, the National Park Service has not adequately maintained, operated or promoted them due to lack of funding and staff resources. The small staff that administer them are very dedicated and hardworking, but more resources are needed for adequate protection, interpretation, and management. Other Federal and District government agencies need to do their part to help. Our organization, the Alliance to Preserve the Civil War Defenses of Washington, does what we can in the private sector to provide advocacy, raise public awareness and education. But much more is needed from everyone. The NCP's Parks and Open Space Element should provide direction and guidance.

Loretta Neumann, President

Alliance to Preserve the Civil War Defenses of Washington

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Name: Andrea Rosen

Location: Washington, DC

Comments:

I ask the NCP to advocate for environmentally sensitive lighting in Federal parks and open spaces. Please amend the Comprehensive Plan to require: fully shielded lighting; warm color temperatures (below 2700k); and lighting that is no brighter than required for a residential street or alley. This would be for a white surface (residential cement road, sidewalk, etc.) an average of 0.3 footcandles (or 3 lux); or if the surface is asphalt, then a bit brighter, 0.4 footcandles (or 4 lux). Thank you.

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Name: Bonnie Garrity

Location: Washington, DC

Subject: Comprehensive Plan for the National Capital: Federal Elements—Parks and Open Space Element

Dear Ms. Singh,

For twenty years, as a member of the International Dark Sky Association, I have volunteered to talk with and educate civic officials about IDA's mission: to preserve and protect the nighttime environment and our heritage of dark skies through environmentally responsible outdoor lighting.

It comes as a surprise to discover no mention in section B of the nighttime viewshed, which comprises nearly 50% of our scenic views in parklands, and the need for its protection. I am suggesting some additions to the text that call for restoring and protecting the views of our night sky, an important

cultural heritage and natural resource. Doing so would attract people to the open spaces for stargazing and socializing, and would aid amateur and professional astronomers.

Protecting the night also means protecting our wildlife, forests, and plants. Scientific research has shown that artificial lighting disrupts our ecosystems and impacts many species, including fireflies, pollinating insects, turtles, frogs, birds, bats, owls, mice, butterflies, and fish. and many more. Smithsonian reported in 2014 that researchers have found that 48% more insects circle white LEDs than traditional high pressure sodium lamps, which greatly depletes their numbers. This same article reported that gypsy moths, one of our forests' most destructive pests, are drawn in by the white light. It is important to minimize the blue content of outdoor light to preserve the natural order as much as possible.

Therefore, I suggest the addition (in bold face) in the text in section B, p. 22, second paragraph: "It is important to minimize the impact of development and outdoor lighting on ecologically sensitive areas and to protect the habitat and ecological functions of natural areas."

In the second paragraph on p. 22, I suggest adding (in bold face) to the sentence: "Sensitive siting and construction of structures, including careful attention to outdoor lighting, can ensure protection of the day time vistas and night time sky views."

I recommend adding POS.B.23 on page 26---

The federal government should:

POS.B.23 Mandate that all outdoor lighting for built structures, streets, trails, sidewalks, and plazas be full cut off in design; use the lowest levels of light needed for safety and visibility; use only warm color of light, at 2700K or warmer; and all lights not needed for safety be turned off at 10 p.m.

Thank you for considering my comments.

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Name: Karen Kumm Morris

Location: Arlington, VA

Comments:

Very thoughtful update, recognizing the need to balance the often competing needs of users and interests. I have only one comment regarding the explicit need to provide for diverse populations and age groups when incorporating features within the Parks and Landscapes. More seating, restrooms, drinking fountains and in some cases shade needs to be provide in appropriate ways to serve the range of users in these places. This policy could be added to POS.E.4 Just stating that there are multi functions to accommodate does not recognize the need for user comfort especially of diverse age groups.

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Name: Susan Dorn

Location: University Park, MD

The National Park Service (“NPS”) concluded in its 2011 Environmental Assessment that the proposed pedestrian bridge across the Anacostia River would have a “beneficial” impact on visitor use experience. A pedestrian bridge could be a delightful addition to the Anacostia River Walk Trail—so long as no piers are placed in the river itself. However, the 2011 NPS assessment never considered the impact (or related health and safety) on the actual, current users of the river over which the bridge is proposed to be built. Nor were the greatest number of existing users of the river itself asked to comment or weigh in on the plan. A clear span bridge addresses the safety, enjoyment, and environmental issues that a bridge with piers sunk into a narrow, shallow riverbed cannot help but create. The remainder of the issues below are intended to illustrate the need for a re-design of the proposed bridge.

#### 1. The Impact and Perspective of Actual River Users Need to be Considered

The greatest numbers of users of the Anacostia at the site of the proposed bridge are rowers—rowers who row mostly from the Bladensburg Boathouse in Bladensburg, Maryland, but also rowers who row from the Anacostia Community Boathouse. There are over 500 Bladensburg rowers use the river *daily* during rowing season, and include five high school teams, three college teams, a masters rowing community club and a junior community club, as well as individual rowers. The one group actually using the river consistently and daily would benefit from the proposed bridge plan was simply totally ignored.

#### 2. The NPS Drawing of the Riverbed Must be Accurately Assessed

The Anacostia is a tidal river. The location proposed by NPS for the bridge spans a section of river that is perennially afflicted with sandbars. To be safe, crew boats ought to have water at least three feet deep. The proposed drawings for the bridge in the NPS environmental assessment show draft in the river bed that is incorrect. These depths of water change very quickly to being 2-3 feet shallows at low tide, within 60 feet (approx. at Hickey Run tributary) of this proposed site, on the downriver side. The diagrams fail to capture the actual river dynamics in the tentative location of the bridge. Not only is the profile of the river inaccurate in documents prepared to support the proposed design, it fails to reflect the depths at both high and low tides (the lowest of low tides should be considered, and by season, as the tides in this river are significant). Positioning bridge piers as proposed deprives boatsmen of the use of a significant channel of water sufficiently deep to utilize. At low tide, it is difficult even at present for two boats to remain abreast. A third boat needs to stop altogether.

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Name: Marcia Montgomery

Location: Washington, DC

Comments:

Dear Ms. Singh:

I write in support of the letter sent to you from the Capitol Hill Restoration Society (CHRS) regarding item POS.B.19.

Please include language in that section asking the Federal government to minimize light pollution in park areas by installing light fixtures on federal buildings that meet the standards for a seal of approval from the International Dark Sky Association. Such light fixtures will benefit park visitors and employees as well as also local, transient and migratory wildlife in our region.

The National Park Service is using dark sky friendly lighting fixtures on the National Mall. A night time satellite image of our area clearly shows the darker area from the U.S. Capitol to the Potomac River, up to the White House, and in East and West Potomac Parks. There is enough light for people to move about safely, yet these lights contribute very little to the region's light pollution and sky glow.

Thank you for your attention.

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Name: Delores Bushong  
Location: Washington, DC

Comments:

Because of the known harmful effects of light pollution on wildlife and migratory birds (including suppression of melatonin and disruption of circadian rhythm) the Parks and Open Space element should include the following: CCT no higher than 2700 kelvin, full-cut off shielding, and light levels no more than 20% above AASHTO minimum for roadways. Lights should be dimmed after 9 PM.

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Name: Larry Curran  
Location: Bethesda, MD

Comments:

The NCPC Plan Federal Elements needs to address the activities and uses of the waterways themselves in detail commensurate with that afforded land based elements.

The plan provides detailed descriptions of land based activities (e.g. hiking, biking, jogging, commuting, passive enjoyment, etc.). Along with this there are specific details, cautions, conditions, future considerations, possible developments, etc. to indicate the Commission's intentions. There is no mention of activities and plans for the waterways themselves other than:

POS.B.13 Encourage actions that improve the water quality of the Anacostia and Potomac Rivers to contribute to the restoration of natural systems, improved water quality, and increased recreational use.

This lack of direction treats the waterways as ancillary to the "real" projects to connect parks to open space, preserve archeological elements, border park lands, etc. There is no mention of the activities conducted on the waterway (e.g. swimming, fishing, kayaking, rowing, bird watching, etc.). This has set up a situation in which a bridge design over the Anacostia River is being contemplated without input from the users of the river. The Environmental Assessment was terminated with a Finding of No Significant Impact resulting from lack of understanding of how the river is used.

In this example, the bridge as currently designed, will significantly impact the 500 daily rowers engaged in high school, college and masters crew programs. Support piers will obstruct the narrow waterway, disturb contaminated sediment in the riverbed, contribute to sedimentation of the tidal river, all without study under the EA. The 500 daily users of the river is probably well above the number of daily users of the bridge but they have not been consulted on the design of the bridge to their detriment.

NCPC intentions for the future of the waterways themselves needs to be included in the comprehensive planning and guidance for actions that affect the waterways and how they are used must be provided in this plan.

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Name: Pat Powell

Location: Washington

Comments:

Comment on NCPC Parks & Open Space Element May 4th 2018 Golden Triangle Business Improvement District

Much of the NCPC Parks & Open Space Element document focuses on the concept of adapting designed landscapes and the balancing of multiple uses within parks. In the urban parks the need to provide spaces that are designed landscapes intended to accommodate multiple uses is critical. In the dense areas of the city parks are places for people to gather, hold meetings, attend events, and participate in any number of diverse activities.

As public spaces have evolved, so have the threats against them. Over the past several years the threat of attacks using vehicles as weapons has increased worldwide. These attacks have been committed by a wide variety of individuals with wide ranging ideology. These attacks, by their very design, have been focused on crowded and open places during peak times. Further attention in the Parks & Open Space Element should be paid to this concept.

As more attention is paid, it must be important that the security measures be proportionate to the threat that the measures are intended to reduce. Threat mitigation efforts have evolved since 9/11. Many communities are moving past simple bollards, concrete planters, and walls. The next generation of mitigation efforts involve meshing smart urban design with innovative physical security measures to create a safe, but attractive and functional environment. We would encourage NCPC to further expand on this concept in the final version of the Parks & Open Space Element.

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Name: Stephen Money

Location: Washington, DC

Comments:

I would like to register my objection to change POS.C.9, which eliminates the goal of completing the Fort Circle Park trail system, and replaces it with a plan to link the forts to surrounding communities using the existing street rights-of-way, sidewalks, and trails. The long-planned trail system should not be abandoned. A fully separated and maintained trail system would be safer, would attract more users, and better link the forts to one another.

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Name: Paul Spreiregen

Location: Washington DC

Comments:

Addendum:

Allow vending kiosks in parks. Kiosks would be carefully designed - maybe through design competitions.

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Name: Paul Spreiregen

Location: Washington DC

Comments:

Trees Grass Shrubs Water Flowers Benches Trash Receptacles

Design to be able to sit in sunshine in winter, shade in summer.

Design at scale so that passers-by on perimeter can see in. This gives sense of security, especially for women.

Models are McPerson and Farragut. Rawlings is a masterpiece.

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Name: David Cranor

Location: Washington

Comments:

I'm disappointed that this plan doesn't specifically mention allowing bikeshare to access park land. Capital Bikeshare is a great way for visitors to connect between parks and open space, but very few stations are allowed on park land. NPS should, as part of its stewardship, do more to encourage alternative transportation and that should be called out in this plan. A policy that read "Encourage alternative transportation to and between parks and open space by creating space for bikeshare stations, and adding bike parking, anywhere that car parking exists." would be a great addition

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Name: Daniel A. Maceda

Location: Washington

Comments:

Request the National Park Service to revise the policy restricting pets from DC or other urban parks to allow pets on leashes. Increase the number of benches and water fountains to encourage more access and usage by seniors and persons with limited mobility.

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Name: Bernard H. Berne  
Location: Arlington, Virginia

Comments:

I propose the a revision to Section D. (Balance Multiple Uses Within Parks), of the Parks and Open Space Element that will add the following recommendation on page 36 following "The federal government should ....":

POS D.8. Except where precluded by other uses, replace frequently mowed open spaces with natural areas, including meadows and pollinator habitats.

Explanation: Many National Parks in the National Capital Region, including the George Washington National Parkway, contain wide expanses of frequently mowed lawns that serve no useful purpose.

These landscaped areas support little wildlife and require needless federal expenditures for frequent mowing. The National Park Service should mow these areas only once a year (outside of growing season) to encourage the development of natural meadows and pollinator habitats while controlling the spread of invasive vines and other non-native vegetation.

On 20 June 2014, President Barack Obama issued a presidential memorandum entitled "Creating a Federal Strategy to Promote the Health of Honey Bees and Other Pollinators". The memorandum established a Pollinator Health Task Force, to be co-chaired by the Secretary of Agriculture and the Administrator of the Environmental Protection Agency. On May 19, 2015, the Pollinator Health Task Force issued a "National Strategy to Promote the Health of Honey Bees and Other Pollinators" (National Strategy (<https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/Pollinator%20Health%20Strategy%202015.pdf>)). The strategy lays out a number of current and planned federal actions, which include: " Pollinator Habitat Acreage: Restore or enhance 7 million acres of land for pollinators over the next 5 years through Federal actions and public/private partnerships."

However, the National Park Service has not complied with the National Strategy within the National Capital Region. The National Park Service is still frequently mowing the wide unused lawns that occupy most of the George Washington Memorial Parkway's landscape between the Arlington Memorial Bridge and Mount Vernon. Further, the National Park Service is still frequently mowing much of the median between the traffic lanes on the Baltimore-Washington Parkway.

These costly federal actions, which are contrary to federal policy, are significantly harming the natural environment in the National Capital Region. The Parks and Open Space Element therefore needs to contain a recommendation that will help the federal government implement the National Strategy within the National Capital Region.

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Name: Sherry J Gillespie  
Location: Washington

Comments:

In planning for connectivity of parks and open spaces, I would like to see specific attention paid to bike routes and dedicated trails that further the efforts of improving the bike-friendliness of D.C. and the surrounding areas.

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Name: John Henderson, President of Green Spaces for DC  
Location: Washington, DC

Comments:

Section A: Protect the Open Space and Design Legacy At page 7, Balance Multiple Uses within Parks, â€“  
Add language about human health benefit.

The plan is conspicuously silent about lighting. Add consideration of ways to enhance the nighttime experience through lighting of iconic elements of the public realm.

Lighting plays an important part in ensuring both individual and public safety. From both a cultural and economic perspective, sensitively illuminated urban areas effectively enhance the public realm by allowing people to live, work, and play outside of daylight hours. Activating the public realm after dark enlivens and enriches the city. Lighting iconic elements, such as buildings, bridges, sculptures, statues, memorials, and fountains can elevate civic pride by highlighting artistic achievement and historic legacy. It can also increase the legibility of the city through reinforcement of view corridors and activity nodes.

Section B: Provide Stewardship of Cultural and Natural Resources  
POS.B.15 -- Add human health benefit.

Section F: Build Partnerships and Coordination Among Multiple Landowners and Jurisdictions  
POS.F.2 -- Add language about fostering and supporting the work Friends Groups that can partner in a meaningful way to promote, maintain, operate, and fundraise for park sites and facilities. [Often these groups exist but are not given any meaningful role. They then fade away or become dysfunctional or disruptive.]

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Name: Rene T.  
Location: Washington, D.C.

Comments:

I suggest that the Commission agree to allow more Capital Bikeshare docks on federal property, in particular, the areas under NPS' authority. I also would be delighted to see dockless electric scooters in the CapitalSpace Plan. These additional modes of transportation will allow visitors and residents alike to access parts of the NCR that are not easily as accessible by foot or vehicles.

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Name: Ben Fox  
Location: Washington, DC

Comments:

I think we should create a system that enables groups to reserve land for a fee. Seems like a simple way to create a system that generates revenue which can be used to fix and take care of the land in use. Closing things down seems like a massive mistake, and will have lasting repercussions outside of simply stopping sports from playing on the National Mall

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Name: Pearl Donohoo-Vallett

Location: Washington DC

Comments:

The neighborhood parks on Capitol Hill are jewels of the community and the commons for adults and children alike to meet and play. All of the parks (especially Lincoln) would benefit from improved play facilities for children over 3 years old. Marion park recently lost several trees and the area is now almost unusable during sunny summer days. Given the warming summers in DC any features to cool the landscape and its users would be very beneficial.

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Name: Jordan Riesenber

Location: Washington

Comments:

These comments may be too specific for this stage of the process, but I wish to add my support for exploring the creation of new public view-sheds using the park assets in the DC region. There are a few key places where opportunities exist to offer unparalleled views of the DC Capital region.

(1) The National Arboretum: The main hill in the National Arboretum offers an opportunity for a 360-degree view of the entire region without any major obstructions. Currently the peak of this hill is too covered in trees (admittedly, I know it is odd to say "too covered in trees" in an Arboretum) to capitalize on the view. Perhaps a small view could be cleared towards the monumental core, or even a long term plan could move the existing National Capitol Columns to the top of the hill oriented toward the contemporary Capitol building (the current area of the columns could be returned to forest as compensation). If that is too drastic or if the forest cannot be altered, perhaps a lookout tower as is found in many State parks around the country could do the trick. Additionally, re-opening the park's entrance with Maryland Avenue could offer easier access for local residents to enjoy the Arboretum, and extended hours would certainly be a plus!

(2) Fort Lincoln Park: Previously this park had a wonderful view of the DC region, but a recent town-home development has (just barely) erased the western view from the park's gazebo structures. Should an opportunity ever arise to renovate this park, perhaps the seating structures or new design can incorporate a slightly higher elevation to restore the previous view of the region.

(3) Fort Totten Park: This park is in a similar situation to the National Arboretum, where the peak of the hill is too tree-covered to take advantage of the potential views. Perhaps here one or two view-sheds could be carved out of the forest, and in exchange replanting trees in other parts of the park.

(4) Old Soldiers' Home Golf Course: A long term plan could consider allowing portions of this property to become a public park, protecting the view-sheds toward the monumental core.

(5) The ridge in Anacostia: The ridge line southeast of the Anacostia River could offer astounding views of DC, and also serve a local parks to area residents. Perhaps explore opportunities along the existing trail network for small viewing platforms and small tree clearance at key locations where the terrain allows. Fort Mahon Park, the fields north of the Avalon playground and the property of Our Lady of Perpetual Help Church have potential to be public parks with breathtaking views of DC and neighborhood treasures on the level of Dolores Park in San Francisco. These properties should be preserved and the view-sheds protected from development that could block them (as occurred at Fort

Lincoln Park and Meridian Hill Park). Perhaps an easement for a trail could be negotiated from landowners in the area if not everything is already under federal control.

(6) DHS and St. Elizabeth West Campus: Technically part of the Anacostia ridge, but worth mentioning separately. The plan should investigate whether the security perimeter and fences for DHS can be moved south of Golden Raintree Drive to allow the main hill (with a view of DC) to be given to the public as a major park.

(7) Meridian Hill Park: Consider purchasing the apartments at 2112 New Hampshire Avenue if they ever come up for sale, and reduce the building's height by two floors to restore Meridian Hill Park's view of the monumental core.

Thank you for your work!

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***(The following were submitted as handwritten comments at public open houses and transcribed by NCPC staff)***

Name: Nicola Bastian

Location: Washington DC

Please reconsider your support of the VMP Plan when communicating with the District about their plan. The site needs more protection, creativity, e.g. like on international water museum.

McMillan Park

in Ward 5, Washington DC

owned by the City of Washington  
DC, formerly by Army Corps of  
Engineers.

A 25 acre jewel-in-the-raw as a park: part of DC's Emerald Necklace, designed by Olmsted, Junior, as a part of the larger McMillan Reservoir: a former sand filtration site. Below ground: breathtaking vaults spanning 29 slow filtration beds, with sand remaining, as if to be put to use again. Above ground: brick towers (used to wash the sand between use), and huge arched entry gates. The whole space had been a vibrant landscape for recreational use, especially the surrounding African American community and Howard University students, faculty, visitors, as documented in photos and live video accounts or residents. It was closed and fenced in during the Second World War and never reopened for public use. It is in the National Register of Historic Places (*McMillan Park Reservoir Historic District 130 000 22, listed 2013*), with significance in., architecture, engineering, landscape architecture. It is designated a Historic Landmark since 1991. the DC Preservation League listed it as „One of the most endangered historic places, 2005 and 2008 ). Since about 1992, mayors and council members have proposed/ approved development plans the latest by a group formed for this particular purpose (VMP). The spirit of this site will survive this onslaught, e.g. destruction of all but one of the underground vaults, patiently waiting for a use more suitable to it Washington, a City of Water, has a chance and responsibility to do right by McMillan Park. The diligent resistance since 1992 to ordinary development is fired and watered by the intensity of its potential and deserves our thanks.

The Park's designer, Olmsted Jr, may reach across the divide to help as well (1870 to 1957). This landscape architect, founder of the the discipline's first formal training program at Harvard, the designer of The National Mall, Jefferson Memorial grounds, White House grounds, Rock Creek Park , may still have his hand in the creation of a landscape for the good of people and serving the preservation of precious places on our planet, as well as in pointing to the need to focus on keeping our water clean and cherished. Currently the Park's future lingers in DC Courts-for how long? The immediate goal: to re-open the bidding process for the *site*, fair and just, and/or open for international competition. To that end, letters/emails should be addressed to Mayor Muriel Bowser: eom@dc.gov and/or Deputy Mayor and head of the DMPED (Deputy Mayor for Planning and Economic Development brian.kenner@dc.gov both at: The John A. Wilson Building 1350 Pennsylvania Ave NW Washington DC 20004  
Nicola's vision: an International Water Museum (none so far in US) Submitted by nicola bastian, April 10th, 2018

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Name: Kara Smith  
Location: Washington DC

- Emphasize sustainability as much as poss.
  - Provide clear and protected bike and ped paths from high-density areas to medium & large open spaces (like Rock Creek Park, Nat. Arboretum, and Roosevelt Is.)
  - Small parks should provide more functionality in terms of public use and ecological function. Most of them are just patches of grass and few trees.
  - There should be more trees and natural buffers along the waterfronts, as well as public access (not as much highways and hardscape).
  - PG. 10-11 Do not gloss over REALITIES OF urban renewal (emphasize negative impacts).
  - More maps! Get more specific to actual places.
- 

Name: Vincent Verweij  
Location: not known

1. One of the most cost-effective ways to improve the environmental benefits of our open spaces is to fight invasive plants and restore degraded habitats. Please include habitat restoration as a critical part of improving our region.
  2. Please prioritize natural elements in development, over landscape, to improve our natural resources and reduce cost.
- 

Name: Loreen Arnold  
Location: Washington DC

- Involve Rowing Community in Planning as stakeholder/ major user for Anacostia & Potomac River Projects.
- More boathouses – All current boathouses are 100% full
  - Clear span bridge at arboretum to preserve safe rowing conditions/protect environment.
-

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Name: Kent Slowinski

Location: not known

1. DC Water has not been maintaining the sewer lines in Glover Archbold Park, primarily due to access issues. DC Water proposed removing more than 4,000 trees to allow construction access to the sewer lines. Please require DC Water to remove all sewer lines from Glover Archbold Park to the public right-of-way on adjacent streets, as there have been numerous sewer discharges.
2. Do not allow Georgetown University to build a boathouse in the C&O Canal Historic District Park flood plain. The C&O Canal is a valuable resource, which will be impacted by a boathouse in the floodplain.
3. Can NCPC encourage building partnerships among NPS, DOEE, DC Water, DDOT and others to reduce stormwater runoff and impacts to stream valley parks - our green ribbons?

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Name: Anonymous

Location: not known

More green space in high-density areas, especially with families/kids.

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