
Parks & Open Space Element

December 6, 2018

Response to Comments

Notes on List of Comments:

- This document lists all comments received during the *draft* 2018 Parks & Open Space Element public comment period and indicates how and where each comment was addressed in the *final* element.
 - *Draft* 2018 Parks & Open Space Element public comment was from March 1 to May 7, 2018.
 - Comments are listed in the following order
 - o *Comments from Federal Agencies*
 - o *Comments from Non-Federal Local & Regional Agencies*
 - o *Comments from Interest Groups*
 - o *Comments from Interested Individuals*
 - Within each agency or group, the comments are organized to follow the order of the *draft* 2018 Parks & Open Space Element guiding principles.
 - Page reference or policy number in the 'comments received' column refer to specific page or policy in the *draft* Parks & Open Space Element, whereas page reference or policy number in the 'response' column refer to specific page or policy the *final* Parks & Open Space Element.
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Guiding Principle	Name or Group	Comment Received	Response
General	NPS	<p>The Element is supposed to cover the entire NCPC region, and while the language in the narrative often 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 administered by NCPC.</p> <p>All references to NPS areas should be stated as NPS "administers" and not "manages" these parks.</p> <p>Active recreation is not sufficiently discussed – this includes rec. uses like skateboarding, sports fields, playgrounds, dog parks, etc.</p> <p>Please note that West Potomac Park and the Tidal Basin are part of the National Mall.</p> <p>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.</p> <p>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.</p>	The narrative has been revised to address these recommendations.
Goal Statement	NPS	<p>Needs to be more inclusive. Suggestion “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>	<p>The Goal Statement has been modified: The federal government’s goal is to protect and enhance the National Capital Region’s parks and open space system—for recreation; as commemorative and symbolic space; as social, civic, and celebratory space; and to provide environmental and educational benefits.</p>
Introduction, p3, 5th paragraph	NPS	<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, Hallowed, Gunston Hall, and or accept donations (River Farm - American Horticultural Society).</p>	<p>The narrative has been revised to address this recommendation.</p> <p>Access to federal facilities and federally administered open space is addressed in Section D.4</p>
Introduction, p4, 2 nd paragraph	NPS	Should add President’s Park, Rock Creek Park, maybe something like Frederick Douglass NHS to be inclusive.	The narrative has been revised to address this recommendation.
Introduction, p5		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	The narrative has been revised to address this recommendation.

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		<p>provide connection with citizens about American history and values and what it means to be an American.</p> <p>Add Rock Creek Park and Greenbelt Park on list of open spaces in para 2.</p> <p>Middle Paragraph - change environmental to natural</p> <p>Balancing National and Local Interests - This paragraph seems to say the same thing several times. Suggest simplifying. Also it provides statistics for parks only (no open space) within the District of Columbia. This section should contain statistics for parks AND open space for the region to provide and overall context for the element.</p>	<p>The narrative has been revised to address these recommendations.</p>
Introduction, p6	NPS	<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"> · Designed Landscape / Cultural Landscape · Natural Park or Area · Recreation Area · Waterfront Park – rivers, waterways · Parkways · Trails and Greenways <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> <p>Last three bullets are characteristics of Parks and Landscapes – why not just discuss under the relevant park and landscape type.</p> <p>Consider adding a 6th type of landscape: Recreational Park. Landscapes focused on recreational activities such as hiking, camping, picnicking, and ball fields. Should Designed Landscapes and Historic Parks be combined?</p>	<p>The park categories have been modified to address these recommendations:</p> <ul style="list-style-type: none"> ○ Cultural Landscapes: Geographic areas associated with a historic event, activity, person, or exhibiting characteristics of a specific design style or aesthetic values. These landscapes were affected, influenced, or shaped by human involvement and consist of natural and constructed elements. ○ Natural Parks: Protected natural or semi-natural areas—including terrain features, forests, wetlands, stream valley, or tributary parks, wildlife refuge areas, easements and conservation areas—that help preserve, protect, or restore the natural environment, natural ecosystems, vegetation, and wildlife. ○ Waterfront Parks: Rivers and waterways including public space along rivers and waterways that often incorporate water-related activities. ○ Recreation Parks: Parks that accommodate outdoor recreation activities such as designated areas for hiking, camping, picnicking, athletic fields, pools, skating rinks, and playgrounds. ○ Trails, Parkways, and Greenways: Designated linear routes used by motorists, bicyclists, and pedestrians or linear habitat corridors that follow natural or constructed features.

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Introduction, p7	NPS	<p>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.</p> <p>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 do not think this is an accurate statement and does not add to this section. Suggest removing it.</p> <p>Principles – suggest some rewording and reorganization</p> <ul style="list-style-type: none"> · Protect legacy of parks and open space design · Encourage stewardship to wisely conserve natural (NR) and cultural resources (CR) – these may need to be two different bullets · Improve access to connected parks and open space · Encourage multi-use parks and open space to meet needs of all people · Reinforce community identity and/or agency branding of parks and open space (new) · Design commemoration to accommodate flexible programming · Coordinate a collaborative open space network in the NCR (partnerships are one method). The method is partnerships – the principle is use coordinated collaborative approaches to make a cohesive park and open space network 	<p>The narrative has been revised to address these recommendations.</p> <p>The guiding principles have been modified to address the recommendations:</p> <ul style="list-style-type: none"> ○ Protect the Historic Features of Parks and Open Space ○ Encourage Stewardship of Natural Resources ○ Balance Commemorative Works within Parks ○ Improve Access to, and Connections between, Parks and Open Space ○ Balance Multiple Uses within Parks ○ Build a Cohesive Parks and Open Space System
Introduction, p8	NPS	<p>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.</p> <p>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.</p>	<p>The narrative has been revised to address these recommendations.</p>

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		Need to define Monumental Core earlier – since open space in the Monumental Core often has a federal symbolic, civic, celebratory, or commemorative purpose.	Monumental Core described in Introduction under section ‘Parks and Open Space in Washington’ (p3). Also, see map on p4.
Protect the Parks and Open Space Design Legacy, p9	NPS	Starting on Page 9 - 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 spaced developed as a regional system. Principle for L’Enfant – add “spaces for commemoration”	The narrative has been revised to address these recommendations.
Protect the Parks and Open Space Design Legacy, p9	NPS	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)	The narrative has been revised to address these recommendations.
Protect the Parks and Open Space Design Legacy, p10 McMillan Plan		Add or revise – Established and reinforced neoclassic architectural character within the Monumental Core. Might be worth providing dates establishing CFA and NCPPC to implement McMillan vision.	The narrative has been revised to address these recommendations.
Protect the Parks and Open Space Design Legacy, p11 c) .1	NPS	The commissions review buildings as well as parks and open space. National Mall is within the Monumental Core so no need to call it out separately	The narrative has been revised to address these comments.
Protect the Parks and Open Space Design Legacy, p11 d)	NPS	Green spaces and plazas are/ were public open space amenities	The narrative has been revised to address this comment.
Protect the Parks and Open Space Design Legacy, p12	NPS	1 st paragraph- 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 Glen Echo was amusement park by 1911 and closed by 1968 before its new life – so it may be in the wrong spot. What about other planning initiatives for other federal agency parks and open space elements? Again this section is too DC focused and not regionally focused. Combine last two sentences – use Pershing new name. Not sure you should characterize Western Plaza as now Freedom Plaza – since it was larger.	The narrative has been revised to address these comments. The narrative has been revised to address these recommendations.

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Protect the Parks and Open Space Design Legacy, p13	NPS	<p>Legacy principle – what about creating identity for areas and connecting open spaces</p> <p>Other Planning Initiatives - 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.</p>	<p>The title of the guiding principle has been modified to ‘Protect the Historic Features of Parks and Open Space’. This title better acknowledges the historic and cultural significance of the park system.</p> <p>The narrative has been revised to address these recommendations. The revision discusses the following as regional efforts--</p> <ul style="list-style-type: none"> - Highway Plan - GWMP/ BW Parkway - Capper-Cramton Park system - Development of other Regional Open Spaces
Protect the Parks and Open Space Design Legacy, p14 Policies POS.A.1 through POS.A.7	NPS	<p>Call out box related to Rock Creek - the 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.</p> <p>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.</p> <p>Add President’s Park to historic parks</p> <p>Last par. Penn Ave is a symbolic grand ceremonial boulevard</p> <p>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?</p> <p>Historic parks - Add National Mall and Memorial Parks to prominent historic parks. it is both an historic park and a cultural landscape</p> <p>C&O Canal National Historical Park - use this or C&O Canal NHP throughout the document.</p> <p>Par 3 - Why Prince William not listed in Natural Parks with reference to CR – all parks in NCR likely are both cultural and natural</p>	<p>The narrative has been revised to address these recommendations.</p> <p>The title of the guiding principle has been modified to ‘Protect the Historic Features of Parks and Open Space’</p>

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Protect the Parks and Open Space Design Legacy, p16	NPS	<p>Memorials like John Marshall Park are treated by NPS as if they are eligible for National Register. John Marshall as an example, may be eligible regardless of age. It has not been evaluated for listing.</p> <p>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.</p> <p>This page should talk about retaining character defining features vs. adaptability.</p> <p>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.”</p> <p>POS.A.12 – too wordy. Simply state that rehabilitation should consider original design intent</p>	<p>The narrative has been revised to address these recommendations.</p> <p>The Fort Circle Drive was not implemented but the trail that links some of the civil war fort sites is discussed in section D.3 ‘Enhance the Existing Trail Network’.</p> <p>The section A.3 ‘Adapt Designed Landscapes Sensitively’ section does not recommend retaining character defining features vs. adaptability. It suggests key questions that need to be considered when assessing designed landscapes.</p> <p>The policy has been revised to address this recommendation. See POS.A.8</p> <p>The policy has been revised to address this recommendation. See POS.A.10</p>
Protect the Parks and Open Space Design Legacy, p16		<p>2nd paragraph - 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>POS.A.9 – shouldn’t this be NCR instead of Washington?</p>	<p>The narrative has been revised to address these recommendations.</p>
Provide Stewardship of Cultural and Natural Resources, p19	NPS	<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>Cultural Resources now discussed under the first guiding principle – Protect the Historic Features of Parks and Open Space. See section A.2</p> <p>The narrative has been revised to address these recommendations.</p>

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		<p>Why not ROCR under terrain? It was reason for establishment. Move it up before general regional landscape described.</p> <p>4th paragraph - 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.</p>	<p>Individual NPS Units are not identified in the element.</p> <p>The narrative has been revised to address these recommendations.</p>
Provide Stewardship of Cultural and Natural Resources, p20	NPS	<p>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".</p> <p>Paragraph 2 - 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.</p>	The narrative has been revised to address these recommendations.
Provide Stewardship of Cultural and Natural Resources, p21 Provide Stewardship of Cultural and Natural Resources, p22	NPS	<p>Add BW Parkway to par 1</p> <p>Para 5 shows this topic as Rivers and Waterways –</p> <p>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.</p> <p>Waterfront parks in urban or developed commercial areas are becoming more common.</p> <p>Para 1. Three of the areas largest greenways are not mentioned. Include George Washington Memorial Parkway, Suitland Parkway and Baltimore-Washington Parkway.</p>	The narrative has been revised to address these recommendations.
Provide Stewardship of Cultural and Natural Resources, p23	NPS	<p>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)</p> <p>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.</p>	The narrative has been revised to address these recommendations.
Provide Stewardship of Cultural and Natural Resources, p22	NPS	<p>3rd par. CR – Anacostia Park – history contributes all these things (Native Americans are not events)</p> <p>Maybe add Frederick Douglass House to this listing of places that influenced history and raise awareness</p> <p>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.</p>	The narrative has been revised to address these recommendations.

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Provide Stewardship of Cultural and Natural Resources, p23	NPS	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? 2nd par. “Passive” not needed when referring to natural areas.	The narrative has been revised to address these recommendations.
Provide Stewardship of Cultural and Natural Resources, p24	NPS	May want to state in POS.B.1 protect and improve conditions of terrain features	The policy has been revised to address this comment.
Provide Stewardship of Cultural and Natural Resources, p25	NPS	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?	Thank you for your comment. Policies have been revised to address these recommendations.
Provide Stewardship of Cultural and Natural Resources, p27	NPS	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.	The narrative has been revised to address these recommendations. Policies have been revised to address these recommendations.
Provide Access to and Connections between Parks and Open Space, p28	NPS	1st par – coordinated not unified park and open space 2nd par – add bikeways and multi-modal transportation to pedestrian friendly network	The narrative has been revised to address these recommendations.
Provide Access to and Connections between Parks and Open Space, p29	NPS	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 some place as well for improved connections; how about incorporating safe multi-modal bike and pedestrian use into parkways.	The narrative has been revised to address these recommendations. The intent of the comment is covered in policy POS.E.7

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Provide Access to and Connections between Parks and Open Space, p30	NPS	<p>Views from Banneker now blocked by development</p> <p>Edit to read the following - 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 & 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>	The narrative has been revised to address these recommendations.
Provide Access to and Connections between Parks and Open Space, p31	NPS	<p>Par about trails plan should be located by graphic.</p> <p>3rd par delete 2nd sentence - obvious</p> <p>Capital Trails Coalition – like Bike groups – could be under stewardship section.</p>	The narrative has been revised to address these recommendations.
Provide Access to and Connections between Parks and Open Space, p32	NPS	<p>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.</p> <p>2nd par – replace last sentence with “Agencies should periodically assess security requirements to see if additional public access is appropriate.”</p> <p>C.1 – Improve connections C.2 - Overcome or remove barriers C.3 - Create multiple access points from communities</p>	<p>The narrative has been revised to address these recommendations.</p> <p>The policies have been revised to address these recommendations.</p>
Provide Access to and Connections between Parks and Open Space, p33	NPS	<p>C.4 – Connect open space</p> <p>C.5 – Encourage access to waterfront parks through...</p> <p>C.8 - Identify opportunities to connect multi-use trails and users Add new policy</p>	The policies have been revised to address these recommendations.

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Balance Multiple Uses within Parks, p34	NPS	<p>POS.C.11 – Provide safe, convenient connections through and around barriers such as roads and bridges</p> <p>Par 1 – environmental protection not a use but a requirement</p> <p>Original 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 it 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>	<p>Comment incorporated in policy POS.D.2</p> <p>The narrative has been revised to address these recommendations.</p>
Balance Multiple Uses within Parks, p35	NPS	<p>Para 3. 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> <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 & Recreation Structures provides useful philosophy, etc.</p>	<p>The narrative has been revised to address these recommendations</p> <p>Entry fee to federal parks and other management related issues not covered in this element.</p> <p>The narrative has been revised to address this comment.</p>

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Balance Multiple Uses within Parks, p36	NPS	<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> <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>	The narrative has been revised to address these comments.
Balance Multiple Uses within Parks, p37	NPS	<p>Add POS.D.8</p> <p>Incorporate convenient, safe, separated multi-use trails systems within parkways.</p>	Comment incorporated in policy POS.E.7
Balance Commemorative Works Within Parks, p38	NPS	<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>CWA & 2M mentioned under the guiding principle-- Balance Commemorative Works in Parks. Reserve, Area 1 and Area 2 are also discussed in detail in the Visitors and Commemoration Element.</p> <p>The narrative has been revised to address these comments.</p>
Balance Commemorative Works Within Parks, p39	NPS	<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> <p>Last par, 3rd sent – add, “...commemoration may create the identity of neighborhoods or communities.”</p> <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>	<p>The narrative has been revised to address these comments.</p> <p>The narrative has been revised to address these comments.</p>
Balance Commemorative Works Within Parks, p39	NPS	<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>	

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		<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>	<p>The narrative has been revised to address these comments.</p>
<p>Balance Commemorative Works Within Parks, p41</p>	<p>NPS</p>	<p>POS.E.6 – color, texture and materials as well</p> <p>POS.E.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>	<p>The narrative has been revised to address these comments.</p>
<p>Balance Commemorative Works Within Parks, p42</p>	<p>NPS</p>	<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>	<p>The section C.2 encourages memorial sponsors to consider creative programming and innovative memorials.</p>
<p>Build Partnerships and Coordination among Multiple Landowners and Jurisdictions, p43</p>	<p>NPS</p>	<p>The method is partnerships – the principle is use coordinated collaborative approaches to make a cohesive park and open space network Coordinated Regional Open Space Network. 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>	<p>See the modified title of the guiding principle— Build a Cohesive Open Space System</p> <p>The narrative has been revised to address these comments.</p>
<p>Build Partnerships and Coordination among Multiple Landowners and Jurisdictions, p44</p>	<p>NPS</p>	<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>The Parks and Open Space Element builds upon the CapitalSpace and Small Parks Management Strategies, incorporates recommendations and proposes policies based on the key findings.</p> <p>The narrative has been revised to address these comments.</p>

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Build Partnerships and Coordination among Multiple Landowners and Jurisdictions, p45	NPS	<p>Last par – add events and celebrations after local commemoration</p> <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>	<p>The element refers to a number of NPS led plans and initiatives. Individual NPS units not called out in the element.</p> <p>Arlington Courthouse Square Study is an example of a successful partnership to protect a preeminent viewshed.</p>
Build Partnerships and Coordination among Multiple Landowners and Jurisdictions, p46	NPS	<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>POS.F.1 - add connected after cohesive</p> <p>POS.F.2 – continue to develop partnerships for coordinated open space with...</p> <p>POS.F.3 – continue to coordinate</p> <p>POS.F.4 – not needed this was address in other section – multi use and commemoration</p> <p>POS.F.5 –transfers to DC to meet local community needs</p> <p>POS.F.6 - partnerships stronger than relationships – usually means a signed agreement</p>	<p>The policies have been revised to address these comments.</p>
<p>Protect the Parks and Open Space Design Legacy</p> <p>Balance Commemorative Works Within Parks</p> <p>Build Partnerships and Coordination among Multiple Landowners and Jurisdictions</p>	<p>GSA (Nancy Witherell) Office of Planning and Design Quality</p>	<ol style="list-style-type: none"> 1) 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. 2) c)1 would read better as a continuation of c) (see p. 9-10) 3) Page 13-- Discuss background and continuing rationale for POS.A.3 and how the Commission has been supportive and how the protection could be improved. 4) For cultural resources, check that you are using NPS/National Register terms when characterizing resources and stating significance. 5) 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. 6) Page 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. 	<p>The narrative has been revised to address these recommendations.</p> <p>The terms views and viewsheds are defined in the Technical Addendum to the Urban Design Element of the Comprehensive Plan.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>7) Page 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.</p> <p>8) Use "landscape design" rather than "landscaping" in most instances throughout this text.</p> <p>9) 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.</p>	<p>The narrative has been revised to address these recommendations.</p>
<p>Introduction</p> <p>Adapting Designed Landscapes</p> <p>Responsible Practices to Protect Natural and Cultural Resources</p> <p>Federal Open Spaces</p>	<p>GSA (Marc Poling) Office of Planning and Design Quality</p> <p>GSA (Marc Poling) Office of Planning and Design Quality</p>	<p>It would be valuable to see which parks and open spaces NCPC believes fall under GSA jurisdiction, and if this has changed from previous years.</p> <p>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.</p> <p>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.</p> <p>The federal government should implement additional park or open space elements too, such as pop-up parks, park-lets, shared streets, or vehicular limited streets, to the extent possible to promote public space.</p> <p>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.</p> <p>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</p>	<p>The Parks & Open Space Element considers open spaces, including the many federal campuses that is under GSA's jurisdiction. Park inventory per specific federal agency not included in the element. The narrative has been revised to address these recommendations.</p> <p>See Section F: Build a Cohesive Open Space System, which discusses different management strategies and opportunities.</p> <p>Discussion incorporated in multiple use section. The narrative has been revised to address this recommendation.</p> <p>See Section C.2 of the Urban Design Element, which include policies to provide access to, and/or connections through campuses, building yards, plazas, or courtyards for local and regional trails, bikeways, pedestrian ways, and open space networks.</p>

Guiding Principle	Name or Group	Comment Received	Response
Coordinating Federal and Local Development Review Processes		<p>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.</p> <p>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.</p> <p>Please provide all of the images to be included in the Element for review before going final.</p>	<p>We are in the process of updating the Federal Workplace Element, which would address designing healthy workplaces and public uses on/near federal properties.</p> <p>Maps and images are shared as part of the final element</p>
General	Smithsonian	<p>Please provide missing illustrations and captions for review, including:</p> <ul style="list-style-type: none"> 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 	<p>The intent of this section, in the draft, was to demonstrate federally and locally administered parkland in Washington DC. The narrative in the final has been modified and the map on page 2 graphically represents federal vs. local parks. An image of Rock Creek Park is shown on Page 9. Similarly, Page 14 and 15 show examples of designed landscapes.</p>
General	Smithsonian	<p>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 Smithsonian's understanding that these guidelines are only applicable to projects subject to review by NCPC.</p>	<p>Applicants are advised to coordinate with NCPC's Urban Design & Plan Review Division to determine which plans and projects are subject to review. The Commission reviews projects for consistency with NCPC plans, including the policies in the Comprehensive Plan.</p>
Introduction	Smithsonian	<p>Page 3:</p> <p>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 from 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?</p> <p>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.</p>	<p>The narrative has been revised to address this comment. See page 1.</p> <p>The narrative has been revised to address these</p>

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		<p>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.</p>	<p>comments.</p>
Introduction	Smithsonian	<p>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.</p> <p>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 are not 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.</p>	<p>The narrative has been revised to address these comments.</p>
Introduction	Smithsonian	<p>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?</p>	<p>The narrative has been revised to address this comment.</p>
Protect the Parks and Open Space Design Legacy	Smithsonian	<p>Page 11. End of first paragraph: Add - <i>portions of</i> Smithsonian’s National Zoo (the Rock Creek campus falls in the category of a historic designed landscapes as well as having component landscapes.)</p>	<p>The narrative has been revised to address this comment.</p>
Protect the Parks and Open Space Design Legacy	Smithsonian	<p>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</p>	<p>The narrative has been revised to address this comment.</p>

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		design legacy but the impact of people and design that also function in a secure, safe and sustainable design for all.	
Protect the Parks and Open Space Design Legacy	Smithsonian	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.	Comment noted. The section A.3 Adapt Designed Landscapes Sensitive lays out important issues to be considered, in the context to both existing and proposed improvements, when assessing designed landscapes.
Protect the Parks and Open Space Design Legacy Provide Stewardship of Cultural and Natural Resources	Smithsonian	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. In addition, 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.).	The narrative has been revised to address this comment.
Provide Access to and Connections between Parks and Open Space	Smithsonian	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. 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.	The narrative has been revised to address this comment. The intent of the section is that many of these spaces, in addition to their individual mission, serve similar functions as parks in that they provide recreational, educational, and ecological benefits. Comment noted.

Guiding Principle	Name or Group	Comment Received	Response
Balance Multiple Uses within Parks	Smithsonian	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.	The Parks and Open Space element provides information about the different uses that exists on the parkway with policy guidance on how to protect resources important to the parkway. See section E.3 'Protect the Scenic Value of Parkways'.
Balance Commemorative Works Within Parks	Smithsonian	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 do not consider our sites other than the NZP to be in the category of "parks" so maybe that is enough to say.	The section 'Balance Commemorative Works Within Parks' states that commemorative works discussed are in NPS & GSA lands. While several commemorative works fall under the CWA, the commission has, in the past, seen District memorial projects. Proposed policies apply broadly to any commemorative element. Applicants are advised to coordinate with NCPC's Urban Design & Plan Review Division to determine which plans and projects are subject to review.
Introduction, p3, 3rd paragraph	DCOP	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.	The narrative has been revised to address this comment. See discussion in the introduction of the element.
Introduction, p4 last paragraph	DCOP	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."	The narrative has been revised to address this comment. See section 'Accommodate Local Needs in Federal Parks' in the introduction.
Introduction, p5, park categories	DCOP	Natural Park is specifically called out, but active recreation is not listed under any of the "parks and landscapes" and needs to be added.	The narrative has been revised to address this comment. See modified park categories.
Introduction, p5, greenways	DCOP	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).	The narrative has been revised to address this comment. See section A.1.2
Parks and Open Space Design Legacy, p6	DCOP	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?	The narrative has been revised to address this comment. See section A.1.2
Natural and Cultural Resources, p6	DCOP	Recreation centers and design parks reflect historic trends in park design too and should be acknowledged as a cultural resource.	The narrative has been revised to address this comment. See section A.1.5
Access and Connections, p6	DCOP	Highway Plan avenues and parkways could also be identified here.	The narrative has been revised to address this comment. See section A.1.5
Balance Commemorative	DCOP	"Many memorials are located within urban parks that also function as recreation facilities and public gathering areas."	The narrative has been revised to address this comment.

Guiding Principle	Name or Group	Comment Received	Response
Works within Parks, p7			
Balance Multiple Uses within Parks, p7	DCOP	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, environmental benefits, mitigate natural and man-made hazards, serve as settings for commemorative works, and function as transportation and wildlife corridors.”	The narrative has been revised to address this comment.
Partnerships and Coordination p42	DCOP	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.	The narrative has been revised to address this comment. See section ‘Parks and Open Space in Washington’ in the introduction.
Parks and Open Space Design Legacy, p8	DCOP	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 did not occur until after 1850. This reads as if the designs of these spaces are associated with L’Enfant.	The narrative has been revised to address this comment.
Parks and Open Space Design Legacy, p9	DCOP	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 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.	The narrative has been revised to address this comment.
Parks and Open Space Design Legacy, p9	DCOP	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.	The narrative has been revised to address this comment. See section A.1.5
Parks and Open Space Design Legacy, p11, 2 nd paragraph		Change reference to “highway system” to “freeway system” to avoid confusion with the Highway Plan.	In the element, ‘Highway Plan’ refers to the specific plan. While the term ‘highway’ is generally refers to a freeway.
Parks and Open Space Design Legacy, p11	DCOP	This should reference CapitalSpace, the first effort to consider the city’s parks and open spaces as one system in more than 30 years. It is referred to on page 27, but not here.	CapitalSpace discussed on page 31.
Parks and Open Space Design Legacy, p13	DCOP	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.	The narrative has been revised to include discussion on Highway Plan. No additional research envisioned in the near future.
p17, Section B and p27, Section C	DCOP	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	Comment noted.

Guiding Principle	Name or Group	Comment Received	Response
		access to the water. This may be appropriate to discuss on other sections too. This area is redeveloping rapidly.	
p19 Waterways	DCOP	Seawalls are deteriorating in large sections of the city – could describe their replacement with vegetated natural shorelines.	Comment noted. See section B.2.2
p24 POS.B.11	DCOP	Could include text about how permeable surfaces should be encouraged.	Comment noted. See section B.3.2
Pg. 28 First paragraph	DCOP	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.	Comment noted. See section F.2
Pg. 32	DCOP	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).	See policies POS.F.3 and POS.F.8
Pg. 33, Section D, first paragraph	DCOP	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.	The narrative has been revised to address this comment.
Pg. 33, Balancing Competing Uses . . .	DCOP	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.	The narrative has been revised to address this comment.
General	DOEE (District of Columbia)	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.	Comments noted. Project review and commission actions rely on analysis and feedback from the Section 106 and NEPA process.
Provide Stewardship of Cultural and Natural Resources	DOEE (District of Columbia)	<p>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.</p> <p>Note that 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).</p> <p><i>DRAFT District Regulation</i> 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.</p> <p>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.</p>	Comments noted. See the Federal Environment Element, which includes policies related to flooding.

Guiding Principle	Name or Group	Comment Received	Response
		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.	
Balance Multiple Uses within Parks	DOEE (District of Columbia)	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.	The narrative has been revised to address this comment.
General	Maryland Department of Environment (MDE)	<p>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.</p> <p>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.</p> <p>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</p>	Comment noted. See Section I: Policies Related to Solid Waste and Hazardous Materials of the Federal Environment Element.
General	Arlington County Planning Division	<p>Supports goal statement and Section F: Build Partnerships and Coordination among Multiple Landowners and Jurisdictions.</p> <p>Current planning projects include</p> <ul style="list-style-type: none"> - Develop a boathouse facility, to be located between Theodore Roosevelt Island/Little River and Francis Scott Key Memorial Bridge. - Collaborate with the National Park Service to develop a master plan for Roaches Run and Gravelly Point. - Collaborate with the National Park Service to maintain and improve existing trail access along the Donaldson Run, Pimmit Run, Gulf Branch, and Windy Run 	Comment and feedback appreciated.

Guiding Principle	Name or Group	Comment Received	Response
		<p>streams, including improved maintenance, erosion control, control of invasive species, signage, and trail markers.</p> <ul style="list-style-type: none"> - 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. 	
Provide Access to and Connections between Parks and Open Space	The Trust for Public Land	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 highlight 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 non-motorized 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	Comment and feedback appreciated.
Provide Stewardship of Cultural and Natural Resources	The Trust for Public Land	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.	Comment and feedback appreciated.
Provide Access to and Connections between Parks and Open Space	C100	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	The new policies of the Parks & Open Space Element provide guidance to federal agencies that administer parks and open space in the region. Further, the policies act as standards by which the Commission and staff can evaluate project proposals

Guiding Principle	Name or Group	Comment Received	Response
		<p>there are a number of specific projects contained in the various plans cited that could appropriately be identified in this Element.</p> <p>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. The Element should address these specific areas and desired outcomes in the context of the policies.</p> <p>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.</p>	<p>The sections specific to ‘protecting the historic features’ ‘stewardship of natural resource’ and ‘improving access and connectivity’ address current issues and would apply to all projects referenced here.</p> <p>The idea of a continuous path/trail along the waterfront was introduced in the Legacy Plan, which is <i>‘not a policy document nor an abstract theoretical exercise. It is a physical plan informed by a vision of what Washington could be’</i>. The Parks and Open Space element is the decision-making framework for Commission actions on plans, proposals, and policies submitted for its review. Section D.2 ‘Connect to, and along, the Waterfront’ addresses the need for improved connectivity to and along the waterfront. It also lists recent and ongoing projects that provide new connections to the waterfront.</p>
Introduction	C100	<p>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.</p> <p>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,</p>	<p>The Goal Statement has been modified: The federal government’s goal is to protect and enhance the National Capital Region’s parks and open space system—for recreation; as commemorative and symbolic space; as social, civic, and celebratory space; and to provide environmental and educational benefits.</p> <p>Comment and feedback appreciated.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>Anacostia Park, East Potomac Park, the National Mall, and many of the Fort Circle Parks. (pp. 26, 28)</p> <p>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.</p>	<p>Comment and feedback appreciated.</p>
<p>Protect the Parks and Open Space Design Legacy</p>	<p>C100</p>	<p>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.</p> <p>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.</p>	<p>The narrative has been revised to address this comment.</p> <p>The policy has been modified to ‘cultural landscapes’ which include historic parks and historic features within parks.</p>
<p>Protect the Parks and Open Space Design Legacy</p>	<p>C100</p>	<p>Adapting designed landscapes (pp. 14-15)</p> <p>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.</p> <p>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.”</p>	<p>The title of this section has been modified to ‘Adapt Designed Landscapes Sensitively’. The section does not take a stance between retaining character-defining features vs. adaptability. The section ‘Key Considerations to Assess Designed Landscapes’, which lays out important issues to consider in both the context of the existing space and the proposed improvements. This section allows a consistent approach to assess designed landscapes.</p>
<p>Provide Stewardship of Natural and Cultural Resources</p>	<p>C100</p>	<p>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]</p>	<p>Comments noted and addressed.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>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).</p>	<p>Comments noted and addressed.</p>
<p>Provide Stewardship of Natural and Cultural Resources</p>	<p>C100</p>	<p>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.</p>	<p>The narrative has been revised to address this comment.</p>
<p>Provide Stewardship of Natural and Cultural Resources</p>	<p>C100</p>	<p>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.</p>	<p>The Anacostia River shoreline area discussed as stream valley buffers under natural resource areas. See sections B.1.4</p> <p>The narrative has been revised to address this comment.</p>
<p>Provide Stewardship of Natural and Cultural Resources</p>	<p>C100</p>	<p>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]</p>	<p>Comments noted.</p> <p>Comments noted.</p>

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Provide Stewardship of Natural and Cultural Resources	C100	<p>Waterways (p. 19)</p> <p>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.</p>	Comments noted and addressed.
Provide Stewardship of Natural and Cultural Resources	C100	<p>Stewardship Opportunities (pp. 21-25)</p> <p>Preservation of waterfront open space</p> <p>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.</p> <p>There should be no further transfer of federal parkland 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 HQ2.1.</p> <p>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:</p> <p>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 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 high-water mark. [suggested changes in bold]</p>	<p>Comments noted.</p> <p>Thank you for your comments.</p> <p>Comments noted. The Parks and Open Space element is the decision-making framework for Commission actions on plans, proposals, and policies submitted for its review. When a project is submitted for review, alternatives are considered in concert with natural and cultural resource protection.</p> <p>Comments noted.</p>

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		<p>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."</p>	
<p>Provide Stewardship of Natural and Cultural Resources</p>	<p>C100</p>	<p>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]</p> <p>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.² [emphasis added]</p> <p>DOEE's Wildlife Action Plan (2015) states: Light Pollution – The use of streetlights 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.</p>	<p>Comments noted. See section B.2.5 and policy POS.B.14 & POS.B.15</p> <p>Comment noted. These issues are also covered in the Federal Environment Element.</p>

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		<p>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 up-light panels, etc. For this reason we suggest a new</p> <p>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]</p>	<p>Comments noted. See section B.2.5 and policy POS.B.14 & POS.B.15</p>
<p>Provide Stewardship of Natural and Cultural Resources</p>	<p>C100</p>	<p>Roads (p. 22)</p> <p>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.</p> <p>In the past, Events DC also included this road in its development plans.</p> <p>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.</p> <p>New or expanded roads should only be built if there is a compelling reason and no other alternative, especially in riparian areas.</p> <p>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]</p> <p>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</p>	<p>Comments noted.</p> <p>The Parks and Open Space element is the decision-making framework for Commission actions on plans, proposals, and policies submitted for its review. When a project is submitted for review, alternatives are considered in concert with natural and cultural resource protection. Additionally, policy POS.B.17 discourages impervious surfaces along the shorelines to help protect water quality.</p> <p>Several policies address the issue of natural and cultural resource protection.</p> <p>Comment noted.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>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.</p> <p>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]</p>	<p>Comment noted.</p>
<p>Provide Stewardship of Natural and Cultural Resources</p>	<p>C100</p>	<p>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, 103.6 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]</p>	<p>Comment noted. See modified section - B.3 Sustainable Practices in Parks and Open Space.</p>
<p>Provide Stewardship of Natural and Cultural Resources</p>	<p>C100</p>	<p>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.</p> <p>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 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, and new flower beds, 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.</p> <p>Section 106</p>	<p>Comment noted.</p>

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		<p>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.</p>	
<p>Provide Access to and Connections between Parks and Open Space</p>	<p>C100</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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]</p>	<p>Comment noted. See revised section D.3 and policy POS.D.8</p> <p>See policies POS.C.4 & POS.D.9 that recommends providing a continuous public open space system along the Potomac and Anacostia shorelines.</p> <p>Comment noted. See revised section D.3 and policy POS.D.8</p> <p>Thank you for your comment.</p>
<p>Provide Access to and Connections between Parks and Open Space</p>	<p>C100</p>	<p>Trails (pp. 29-31) Washington Waterfront Walk NCPCC’s <i>Extending the Legacy Plan</i> (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).</p> <p>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</p>	<p>Comment noted. See revised section D.3 and policy POS.D.9 that recommends providing a continuous public open space system along the Potomac and Anacostia shorelines.</p> <p>The idea of a continuous path/trail along the waterfront was introduced in the Legacy Plan, which is ‘not a policy document nor an abstract theoretical exercise. It is a physical plan informed by a vision of what Washington could be’. The Parks and Open Space element, on the other hand, is the decision-making framework for Commission actions on plans, proposals, and policies submitted for its review. When a project is submitted for review, alternatives are</p>

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		the Washington Waterfront Walk, hopefully bringing the entire project to completion within the next five years.	considered in concert with natural and cultural resource protection.
Balance Multiple Uses within Parks	C100	The second sentence at the beginning of this discussion should include “education” as one of the multiple uses.	Comment noted and incorporated.
Balance Multiple Uses within Parks	C100	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.	Comments noted. The Parks and Open Space element is the decision-making framework for Commission actions on plans, proposals, and policies submitted for its review. When a project is submitted for review, alternatives are considered in concert with natural and cultural resource protection.
Balance Commemorative Works within Parks	C100	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)	Comment noted and incorporated.
Build Partnerships and Coordination among Multiple Landowners and Jurisdictions	C100	Partnerships and coordination are important if we are going to maximize the benefits of our parks and open space. POS.F.1 through POS.F.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. 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.	Comment noted.
Provide Stewardship of Natural and Cultural Resources	Casey Trees	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.	The intent behind the proposed policies is that they be applicable to a range of projects. Intent covered in policy POS.B.4

Guiding Principle	Name or Group	Comment Received	Response
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>POS.B.4 Protect and preserve all forested and stream valley parks as natural resource areas, so they continue to serve as valuable scenic, ecological, educational, cultural, and recreational resources.</p>	Policy modified. See revised policy
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>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.</p>	Policy modified. See revised policy POS.B.10
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>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.</p>	Policy modified. See revised policy POS.B.7
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>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.</p>	Policy modified. See revised policy POS.B.15
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>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.</p>	Policy modified. See revised policy POS.B.5
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>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.</p> <ul style="list-style-type: none"> - <i>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.</i> 	Policy modified. See revised policy POS.B.6
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>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.</p>	Policy modified. See revised policy POS.B.18

Guiding Principle	Name or Group	Comment Received	Response
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>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.</p> <p>- <i>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.</i></p>	Policy modified. See revised policy POS.B.19
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>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.</p>	Policy modified. See revised policy POS.B.20
Provide Stewardship of Natural and Cultural Resources	Casey Trees	<p>POS.B.21 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.</p>	Policy modified. See revised policy POS.B.21
Provide Access to and Connections between Parks and Open Space	Casey Trees	<p>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.</p>	Policy modified. See revised policy POS.D.1
Provide Access to and Connections between Parks and Open Space	Casey Trees	<p>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.</p>	Proposed policy is about improving access and connectivity. See revised policy POS.D.4
Balance Multiple Uses Within Parks	Casey Trees	<p>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.</p>	Proposed policy is about Balancing Multiple Uses. See policy POS.E.4
Balance Multiple Uses Within Parks	Casey Trees	<p>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.</p>	Proposed policy is about Balancing Multiple Uses. See policy POS.E.5
Build Partnerships and	Casey Trees	<p>POS.F.1</p>	Policy modified. See revised policy POS.F.1

Guiding Principle	Name or Group	Comment Received	Response
Coordination among Multiple Landowners and Jurisdictions		Use conservation easements, donations, purchases, exchanges, or other means to create, expand, and enhance a cohesive park and open space system.	
Build Partnerships and Coordination among Multiple Landowners and Jurisdictions	Casey Trees	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.	Policy modified. See revised policy POS.F.2
Build Partnerships and Coordination among Multiple Landowners and Jurisdictions	Casey Trees	POS.F.6 Develop federal and local collaborative relationships to maximize the functionality of small parks as well-maintained local neighborhood amenities green spaces .	Policy modified. See revised policy POS.F.6
Build Partnerships and Coordination among Multiple Landowners and Jurisdictions	Casey Trees	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.	Comment noted.
General	Downtown DC BID (Alex Block)	<p>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.</p> <p>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.</p> <p>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</p>	<p>Comments noted.</p> <p>See section 'Parks and Open Space in Washington', in the introduction, which specifically talks about urban parks.</p> <p>Also, see section F.2, which talks about balancing management of federal parkland, in Washington, with local community needs.</p> <p>Comments noted.</p>

Guiding Principle	Name or Group	Comment Received	Response
General	Georgetown BID	<p>partnership for Franklin Park. It is a model we would like to apply to other federal parks and open spaces in the future.</p> <p>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.</p> <p>More broadly, we encourage NCPC 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.</p> <p>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)</p> <p>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.</p>	<p>Section F of the element cites the recent Small Parks Management Strategies report that developed goals to recognize the complex challenges and opportunities faced by small parks. The report also provides a framework and decision-making methodology used by NPS to identify potential management options.</p> <p>Comments noted. Section F of the element supports balancing management of federal parkland, in Washington, with local community needs.</p> <p>Comments noted. Section D of the element supports improved access and connectivity between parks and open space while minimizing impacts on natural and cultural resources.</p> <p>The narrative has been revised to address this comment. See section E.4 and policy POS.E.9</p>
General	NoMa Business Improvement District (Galin Brooks)	<p>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.</p> <p>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</p>	<p>Comments noted. Section F of the element was developed to encourage partnerships and collaboration between federal, local, and other entities.</p> <p>Comment noted. Section F of the element cites the recent Small Parks Management Strategies report that developed goals</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>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.</p>	<p>to recognize the complex challenges and opportunities faced by small parks. The report also provides a framework and decision-making methodology used by NPS to identify potential management options.</p>
General	Golden Triangle Business Improvement District (Pat Powell)	<p>Comment on NCPC Parks & Open Space Element May 4th 2018 Golden Triangle Business</p> <p>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.</p> <p>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.</p> <p>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 improvements District 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.</p>	<p>Comment noted.</p> <p>The element is organized around key issues faced by federal parks in the NCR. See section E that specifically highlights balancing multiple uses within parks.</p> <p>The narrative has been revised to address this comment. See section E.4 and policy POS.E.9</p> <p>The narrative has been revised to address this comment. Section E of the element supports improved security in parks while minimizing impacts on natural and cultural resources. See section E.4</p>
Provide Stewardship of Cultural and	Capitol Hill Restoration Society	<p>Preservation of waterfront open space</p> <p>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.</p>	<p>The scope and decision of land transfer is outside the scope of Parks & Open Space Element.</p>

Guiding Principle	Name or Group	Comment Received	Response
Natural Resources		<p>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 parkland 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 HQ2.1. 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.</p> <p>Modify 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.</p> <p>Add new policy 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.</p>	<p>Comments noted.</p>
Provide Stewardship of Cultural and Natural Resources	Capitol Hill Restoration Society	<p>The Element calls for protecting ecologically sensitive areas from the impacts of development. Events DC 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. 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.</p> <p>In addition --</p> <ul style="list-style-type: none"> - The proposed road is in a 100-year floodplain. No road should be ever be built here. - 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. New or expanded roads should only be built if there is a compelling reason and no other alternative. <p>For these reasons, we suggest a change to 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.</p>	<p>The section B of the element supports protection of ecologically sensitive areas. The Parks and Open Space element is the decision-making framework for Commission actions on plans, proposals, and policies submitted for its review. When a project is submitted for review, alternatives are considered in concert with natural and cultural resource protection.</p> <p>Comment noted.</p>

Guiding Principle	Name or Group	Comment Received	Response
Provide Stewardship of Cultural and Natural Resources	Capitol Hill Restoration Society	<p>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:</p> <p>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 multiyear 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.</p> <p>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 up light panels For this reason we suggest</p> <p>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.</p>	<p>Comment noted. These issues are also covered in the Federal Environment Element.</p> <p>Comment noted. These issues are also covered in the Federal Environment Element.</p> <p>Comments noted. See section B.3.5 and policy POS.B.14</p>
Balance Multiple Uses within Parks	Capitol Hill Restoration Society	<p>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.</p>	<p>See section B.3.4, which highlights the protection of valuable scenic viewsheds.</p>

Guiding Principle	Name or Group	Comment Received	Response
		Proposed new policy 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.	
Balance Multiple Uses within Parks	Capitol Hill Restoration Society	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).	Comment noted.
Balance Multiple Uses within Parks	Washington Rowing School	<p>While we support opportunities for increased access to the Anacostia, we request that all new projects impacting the river give consideration to the large community already using it. Boaters using the river north of Benning Road, including WRS, Anacostia Watershed Society (AWS), Anacostia Community Boathouse Association (ACBA), schools and clubs based at the PTCB, and the staff at Bladensburg Waterfront Park (BWP) were not informed that plans for this bridge are moving forward.</p> <p>The National Park Service, USDA National Arboretum, and the National Capital Planning Commission are the primary stewards of the land, water, and riverbed for this proposal. We request that project development include and coordinate with the constituency who utilize the site and will be impacted by development on the Anacostia. We ask that you ensure that our concerns are addressed and encourage increased involvement with the rowing community as this project moves forward. Rowers experience very directly, the impact (unfortunately, often physically) of interventions into the river and observe the changes they produce. Their perspective and participation in planning efforts will provide important information for designers and managers charged with the safety and health of the river and to other users and visitors.</p>	<p>Comment noted.</p> <p>Comment noted.</p>
General comment	Jordan Riesenber	<p>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.</p> <p>(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</p>	<p>Comments noted.</p> <p>Comments noted.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>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!</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p>	<p>Comments noted.</p>

Guiding Principle	Name or Group	Comment Received	Response
General	Pearl Donohoo-Vallett	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.	The Parks and Open Space element provides overall vision and is the decision-making framework for Commission actions on plans and proposals submitted for its review. Maintenance and management issues not covered in this element.
General	Ben Fox	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.	The Parks and Open Space element provides overall vision and is the decision-making framework for Commission actions on plans and proposals submitted for its review. Maintenance and management issues not covered in this element.
General	Rene T.	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.	The CapitalSpace Plan was completed in 2010. The Transportation Element is in the process of being updated and will address different modes of transportation, such as bikeshare.
Protect the Open Space and Design Legacy	John Henderson	<p>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.</p> <p>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.</p>	<p>The narrative has been revised to address this comment. See section A.4</p> <p>See proposed policies POS.A.13 through POS.A.16</p>
Provide Stewardship of Cultural and Natural Resources	John Henderson	Add language about human health benefit.	The narrative has been revised to address this comment. See section B.1
Build Partnerships and Coordination Among Multiple Landowners and Jurisdictions	John Henderson	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.]	This comment is addressed in section F.2, which highlights that in urban parks that also serve local neighborhoods, business improvement districts, interest groups, and other partners, can participate in rehabilitation, development, maintenance, and operations.

Guiding Principle	Name or Group	Comment Received	Response
Provide Access to and Connections between Parks and Open Space	Sherry Gillespie	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 DC and the surrounding areas.	This comment is addressed in section D.3
Balance Multiple Uses Within Parks	Bernard Berne	<p>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":</p> <p>POS D.8. Except where precluded by other uses, replace frequently mowed open spaces with natural areas, including meadows and pollinator habitats.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	The Parks and Open Space element provides overall vision and is the decision-making framework for Commission actions on plans and proposals submitted for its review. Maintenance and management issues not covered in this element.
General	Daniel Maceda	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.	The Parks and Open Space element provides overall vision and is the decision-making framework for Commission actions on plans and proposals submitted for its review. The Element includes policy guidance on balancing multiple uses and improving access to parks.
General	David Cranor	I am 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	Bikeshare and associated parking will be covered in the upcoming Transportation Element update.

Guiding Principle	Name or Group	Comment Received	Response
		open space, but very few stations are allowed on parkland. 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	
General	Paul Spreiregen	<ul style="list-style-type: none"> - 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. - Allow vending kiosks in parks. Kiosks would be carefully designed - maybe through design competitions. 	Comment noted.
Provide Access to and Connections between Parks and Open Space	Stephen Money	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.	Comments noted. See revised policy POS.D.9
Provide Stewardship of Cultural and Natural Resources	Larry Curran	<p>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.</p> <p>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:</p> <p>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.</p> <p>This lack of direction treats the waterways as ancillary to the "real" projects to connect parks to open space, preserve archeological elements, border parklands, 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.</p>	<p>Comments noted. See section D.2 and revised policy POS.D.4</p> <p>Comments noted. See section B.3 and revised policy POS.B.7</p> <p>Comments noted.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>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, and 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.</p> <p>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.</p>	
General	Delores Bushong	<p>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.</p>	<p>Comments noted. See section B.3.5 and policy POS.B.14 This issue is also covered in the Federal Environment Element.</p>
Provide Stewardship of Cultural and Natural Resources	Marcia Montgomery	<p>I write in support of the letter sent to you from the Capitol Hill Restoration Society (CHRS) regarding item POS.B.19.</p> <p>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.</p> <p>The National Park Service is using dark sky friendly lighting fixtures on the National Mall. A nighttime 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.</p>	<p>Comments noted. See section B.3.5 and policy POS.B.14 These issues are also covered in the Federal Environment Element.</p>
General	Susan Dorn	<p>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</p>	<p>The Parks and Open Space element is the decision-making framework for Commission actions on plans, proposals, and policies submitted for its review. When the project is submitted for review, alternatives will be considered in concert with accessibility related issues, natural and cultural resource protection.</p> <p>NPS can provide clarification on more project specific questions.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>create. The remainder of the issues below are intended to illustrate the need for a re-design of the proposed bridge.</p> <p>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 <i>daily</i> 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.</p> <p>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 boatmen 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.</p> <p>3. Bridge Piers Reduce the Usable Width of the River Every pier in a river reduces its usable width, and this is particularly true in the shallow, narrow Anacostia. While the Anacostia’s sheltered narrow geography makes the river ideal as a course for learning to row, it also creates a boat traffic hazard when bridge piers interrupt the riverscape. When the high school, college and masters’ teams are out for practice, as many as three boats of eight or four rowers vie for position across the river (not including the boats returning from practice headed directly toward the racing boats), requiring many last-second adjustments of position. Each of the big crew boats of 8 rowers is rigged with 12 foot oars and is 60 feet long; that takes up a lot of river. These boats are not easily navigated nor designed to be able to adeptly turned, especially by high school steersman (coxswains) just learning to steer. Racing courses for rowing</p>	<p>NPS can provide clarification on more project specific questions.</p> <p>NPS can provide clarification on more project specific questions.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>generally require at least 45 feet of clearance for each boat lane; novice rowers need more clearance.</p> <p>Crew is a <i>racing</i> sport (as well as a wonderful recreation outlet). In order to race, boats must be able to row alongside each other. Reducing the river’s width by constructing bridge piers immeasurably reduces rowers’ use and enjoyment of this otherwise uninterrupted straight stretch of river. The stretch proposed for the pedestrian bridge is the single longest <i>straight</i> stretch of river uninterrupted by bridge piers or natural turns of the river available to the Bladensburg Community Boathouse. This stretch is about 1,500 meters—the distance of the sport’s sprint (short and straight) racing course. Thus, it’s the only place on the river within five miles of the Bladensburg boathouse that offers the opportunity to practice sprint racing. With piers placed in this stretch of the river, given the shallow, narrow navigable channel available, boats will not be able to practice racing against each other without endangering their boats and the safety of their rowers.</p> <p>4. Bridge Piers Create Safety Hazards For man-powered craft, crew boats are fast, going nearly five times as fast as a canoe or kayak. (Racing speed for crew boats of 8 is about 14 mph; for kayaks, average speed is about 3 mph.) Further, rowing shells of single, doubles, and fours row without a coxswain, meaning that the rowers are going <i>backwards</i> without anyone dedicated to steering who is seated looking forward. So both speed and steering need to account for every obstacle placed in the way of rowers simply striving mightily to just physically manage powering the boat. Placing piers in the straight stretch of river not only deprives the rowing community of its only uninterrupted straight stretch, it creates another water hazard that must be avoided. Piers also obstruct the line of sight, making it hard to see approaching boats sharing a tight channel. A number of the crew teams practice in early morning—and in late fall and early spring, they practice before dawn in relative darkness. Piers are unforgiving to crew boats. The hull of racing shells is less than ¼ inch thick (to make the boat as light, and thus as fast, as possible). Needless to say, the boats are relatively fragile—even a modest encounter with a concrete pier (or another boat) can destroy a racing boat and capsize its rowers.</p> <p>5. Bridge Piers Create Silting, Accretion of Sediment and Release Toxins in the Riverbed. The part of the river proposed for the bridge already is subject to shifting sand bars and varied levels of sedimentation. However, construction of bridge piers will increase the collecting of sediment in the very channel of water already shallow. The sedimentation potential presents at minimum a change to the river bottom contours and worse, a degradation of the character of Anacostia. Other existing bridges on the Anacostia (New York Avenue, Benning Road) have created sandbar patterns directly behind piers that</p>	<p>NPS can provide clarification on more project specific questions.</p> <p>NPS can provide clarification on more project specific questions.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>extremely limit navigation at the current bridge approaches. Further, the Anacostia River's clean up efforts are far from fully accomplished after years of runoff from nearby industry. The installation of river-based piers will create inevitable and likely irremediable environmental damage that will result from the release of toxic substances when the riverbed is disturbed during construction.</p> <p>6. A Bridge With A View. Building a Clear Span Bridge is Feasible and May Be, In the Long Run, Less Expensive While not included as a possible design alternative by NPS, it's my understanding that a pedestrian bridge at the proposed location can be designed without any piers in the river at all (a "clear span"). A clear span bridge design can be an amazing and beautiful architectural structure that would links DC's Wards 5 and 7. A clear span bridge can itself become an attraction in itself for visitors. A clear span bridge would create no in-water obstacle, would not create accretion of sediment, and would not impair boatmen's line of vision. Further, the impact of the release of toxins from pier construction in the river was not considered, nor was the long-term necessary monitoring of river quality due to the disturbance of the riverbed estimated. The cost of monitoring and any environmental cleanup needs to be calculated when considering other alternative bridge designs; the NPS environmental assessment failed to include this consideration.</p> <p>7. A Few Other Comments The plan calls for a floating dock of 12 feet. A longer dock would be useful for rowers (a boat of eight rowers is 60 feet long, and even a single rowing shell is 27 feet long). For the many manually powered craft that regularly use this part of the river, a floating dock should be a <i>low profile</i> dock of not more than five inches high. Further, to be ultimately useful, the bridge should remain open after hours. Gates and fences could restrict after-hours access to the Arboretum while allowing bicyclists and joggers continued access.</p>	<p>NPS can provide clarification on more project specific questions.</p> <p>NPS can provide clarification on more project specific questions.</p>
General	Karen Kumm Morris	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.	Comments noted. See revised policy POS.E.1
General	Andrea Rosen	I ask the NCPC 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	Comments noted. See section B.3.5 and policy POS.B.14 This issue is also covered in the Federal Environment Element.

Guiding Principle	Name or Group	Comment Received	Response
		road, sidewalk, etc.) an average of 0.3 foot-candles (or 3 lux); or if the surface is asphalt, then a bit brighter, 0.4 foot-candles (or 4 lux).	
General	Loretta Neumann	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.	Comments noted. See section D.3 and revised policy POS.D.9
General	Loreen Arnold	<p>1. 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.</p> <p>2. 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 cannot just wish this happens, we need to know what real tools can be mobilized.</p> <p>3. 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.</p> <p>4. 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 river-way, and thus stakeholders are shared by both jurisdictions and must be included in the planning policies.</p>	<p>Thank you for comment and feedback.</p> <p>Section F of the element cites the recent Small Parks Management Strategies report that developed goals to recognize the complex challenges and opportunities faced by small parks. The report also provides a range of partnership opportunities, planning and management options that are driven foremost by the underlying resource values of individual parks.</p> <p>Comments noted and addressed in section B.2.2.</p>

Guiding Principle	Name or Group	Comment Received	Response
		<p>5. 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.</p> <p>6. Involve Rowing Community in planning as stakeholder and major user for Anacostia and Potomac River projects. Proposed clear span bridge at the Arboretum to preserve safe rowing conditions.</p>	Comments noted.
Provide Stewardship of Cultural and Natural Resources	Bonnie Garrity	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.”</p>	Comments noted. See section B.3.5 and policy POS.B.14 These issues are also covered in the Federal Environment Element.

Guiding Principle	Name or Group	Comment Received	Response
		<p>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."</p> <p>Add new policy: 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.</p>	
Provide Stewardship of Cultural and Natural Resources	Will Handsfield	<p>In the draft Parks and Open Space Element policy POS.B.6 could be interpreted to relate to our ongoing Georgetown-Rosslyn Gondola Project. The draft element (and maybe its predecessor) talks about keeping the Potomac in a natural state.</p> <p>"Maintain and protect the Potomac Gorge, and the surrounding palisades and gorges and their resources, in its natural condition and keep its transition highlands, the rim areas, and surroundings free of intrusive constructed forms."</p> <p>One interpretation is that this is just about the Mather Gorge and surrounding areas, but another could take that interpretation all the way to Georgetown's Key Bridge. Is there a way you could clarify the geographic area intended to be wild?</p> <p>Alternatively, you could modify to something like this: "Maintain and protect the Potomac Gorge, and the surrounding palisades and gorges and their resources, in its natural condition and keep its transition highlands, the rim areas, and surroundings free of intrusive constructed forms while also facilitating cross-river transit crossings where existing anthropogenic crossings occur to minimize its role as a barrier separating communities"</p>	The intent of the element is to protect existing natural areas and parks on both sides of the Potomac River. It also acknowledges that there are existing urban waterfront areas in Georgetown and other areas in the region. The element does not identify specific geographic limitations or boundaries that mark a transition between natural and urban conditions. The Georgetown-Rosslyn Gondola Project is not specifically addressed and would be subject to more detailed review when submitted for review to the commission. Review will also incorporate guidance from the Federal Transportation Element and feedback from other federal agencies.
Provide Stewardship of Cultural and Natural Resources	Kent Slowinski	<p>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.</p> <p>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 boar house in the floodplain.</p>	Comment noted. Specific issues are addressed when a project is submitted for review to the commission. Range of alternatives considered in concert with natural and cultural resource protection.
Build Partnerships and Coordination Among Multiple Landowners and	Kent Slowinski	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?	NCPC supports any partnerships that support the intent behind the guiding principles.

Guiding Principle	Name or Group	Comment Received	Response
Jurisdictions			
General	Nicola Bastian	Reconsider support for proposed redevelopment of the McMillian Sand Filtration Site.	Thank you for your comment.
Provide Stewardship of Cultural and Natural Resources	Vincent Verweij	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. Please prioritize natural elements in development over landscape to improve our natural resources and reduce cost.	Comments noted. See section B.4.3 This issue is also covered in the Federal Environment Element.
Provide Stewardship of Cultural and Natural Resources	Kara Smith	<ul style="list-style-type: none"> - Emphasize sustainability - Provide clear and protected bike and pedestrian paths from high-density areas to medium and large open spaces like Rock Creek Park, National Arboretum, and Roosevelt Island. - Small parks should provide more functionality in terms of public use and ecological functions. - Provide more trees and natural buffers along the waterfront and more public access. - Do not gloss over urban renewal. Also, emphasize negative impacts. - Include more maps and provide more specific to actual places. 	Comments noted and incorporated throughout the element.
	Darwina Neil	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.	Comment noted and incorporated.
	Darwina Neil	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.	The policy is intended for <i>The Plan of the City of Washington</i> , which includes both L’Enfant and McMillan Plans.
	Darwina Neil	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.	Comment noted and incorporated. See policy POS.C.4
	Darwina Neil	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.	Policy modified. Recommendation considered.
	Darwina Neil	POS.B.4 Protect and preserve the terrain and vegetation of forested areas small forest and stream valley parks as natural resource areas, so they continue to serve as valuable scenic, ecological, cultural, and recreational resources.	Policy modified. Recommendation considered.
	Darwina Neil	POS.B.9 Encourage land use and actions that protect and rehabilitate and improve the Potomac	Policy modified. Recommendation considered. See

Guiding Principle	Name or Group	Comment Received	Response
		and Anacostia Rivers, including and their constructed and natural shorelines to enhance their ecological quality and scenic character.	policy POS.B.7
	Darwina Neil	POS.A.4 Protect and maintain historic parks as important architectural and landscape legacies of national and regional significance.	Policy modified. Recommendation considered. See policy POS.A.5
	Darwina Neil	POS.A.2 Preserve, and protect maintain historic designed landscapes, including their natural and constructed elements.	Policy modified. Recommendation considered. See policy POS.A.4
	Darwina Neil	POS.B.1 Protect the region’s natural terrain and its 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.	Policy modified. Recommendation considered.
	Darwina Neil	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!)	Policy modified. Recommendation considered. See policy POS.B.10
	Darwina Neil	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.	Policy modified. Recommendation considered. See policy POS.B.13
	Darwina Neil	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 prominence 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.	Recommendation to be considered at the time of the Urban Design element update.
	Darwina Neil	POS.B.6 Maintain Preserve and protect the Potomac Gorge, and the surrounding its related	Policy modified. Recommendation considered. See

Guiding Principle	Name or Group	Comment Received	Response
		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.	policy POS.B.11
	Darwina Neil	POS.B.3 Protect and maintain greenways and their natural and cultural resources for their environmental benefits and as natural and cultural resources.	Policy modified. Recommendation considered.
	Darwina Neil	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.	Policy modified. Recommendation considered.
	Darwina Neil	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.	Policy modified. Recommendation considered. See policy POS.B.18
	Darwina Neil	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.)	Policy modified. Recommendation considered.
	Darwina Neil	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.	Policy modified. Recommendation considered.
	Darwina Neil	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: <ul style="list-style-type: none"> • 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. 	Policy modified. Recommendation considered. See policy POS.B.5
	Darwina Neil	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.	Policy modified. Recommendation considered.

Guiding Principle	Name or Group	Comment Received	Response
	Darwina Neil	<p>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.</p>	Policy modified. Recommendation considered. See policy POS.B.16
	Darwina Neil	<p>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.</p>	Policy modified. Recommendation considered. See policy POS.D.8
	Darwina Neil	<p>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.</p>	Policy modified. Recommendation considered. See policy POS.E.6
	Darwina Neil	<p>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.</p>	Policy modified. Recommendation considered. See policy POS.C.6
	Darwina Neil	<p>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.</p>	Policy modified. Recommendation considered. See policy POS.C.7
	Darwina Neil	<p>POS.E.8 Improve and enhance the visual connections and transitions between park space, commemorative elements, and the surrounding environment.</p>	Policy modified. Recommendation considered. See policy POS.C.8
	Darwina Neil	<p>POS.E.9 Plan circulation routes that accommodate visitors or passers-by, and meet ADA requirements 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.</p>	Policy modified. Recommendation considered. See policy POS.C.9
	Darwina Neil	<p>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.</p>	Policy modified. Recommendation considered. See policy POS.C.10
	Darwina Neil	<p>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.</p>	Policy modified. Recommendation considered. See policy POS.C.11
	Darwina Neil	<p>POS.F.4 Balance the national significance of parks with federal and local interests and the need to</p>	Policy modified. Recommendation considered.

Guiding Principle	Name or Group	Comment Received	Response
		accommodate a range of uses and events without adversely impacting natural and cultural resources.	
	Darwina Neil	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.	Policy modified. Recommendation considered.
	Darwina Neil	POS.F.8 Coordinate with responsible agencies and local jurisdictions during redevelopment projects to encourage adding new areas of parks and open space, as well as preservation of existing parks.	Policy modified. Recommendation considered.