



# Executive Director's Recommendation

Commission Meeting: January 9, 2025

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<b>PROJECT</b> <b>Malcolm X Elementary School Modernization</b> 1500 Mississippi Avenue, SE Washington, DC	<b>NCPC FILE NUMBER</b> 8579
<b>SUBMITTED BY</b> District of Columbia Department of General Services	<b>NCPC MAP FILE NUMBER</b> 83.00(38.00)45950
<b>REVIEW AUTHORITY</b> District Projects Outside the Central Area per 40 U.S.C. § 8722(b)(1)	<b>APPLICANT'S REQUEST</b> Approval of final site and building plans
	<b>PROPOSED ACTION</b> Approve final site and building plans
	<b>ACTION ITEM TYPE</b> Staff Presentation

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## PROJECT SUMMARY

The District of Columbia Department of General Services (DGS) has submitted final site and building plans for the modernization of Malcolm X Elementary School located at 1500 Mississippi Avenue, SE in Washington, DC. The planned 20,000 square foot expansion will include administration spaces, classrooms, student dining, and gymnasium. The proposal also includes extensive improvements to the site for various age-appropriate play spaces, improved accessibility, outdoor classrooms, and gathering spaces. The project is designed to achieve LEED Gold and achieve net-zero energy. A solar array will be installed north of the school, in a cleared area adjacent to the staff parking lot, and on the roof of the building. In addition, below-grade geothermal wells will be installed throughout the site. NCPC approved the preliminary plans in September 2024.

## KEY INFORMATION

- The Malcolm X Elementary School Campus is a District of Columbia Public School (DCPS) located in Ward 8 that serves the surrounding area for school children aged Pre-K through 6<sup>th</sup> grade. The school also includes a child development center for younger children.
- The existing school was constructed in 1965 and includes a multi-story building with a one-story gymnasium/cafeteria addition.
- The proposed project will modernize the entire building and campus including new building additions, new multi-function spaces, and new exterior building materials with solar panels on the roof.
- The campus improvements include new play spaces separated by age group, new entry area with seating and public art, and solar panels and meadow plantings behind the school.
- The school is located next to Oxon Run Park, which is administered by the National Park Service (NPS). No impacts to the park are anticipated.

- The Commission approved the preliminary site and building plans in September 2024.

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## RECOMMENDATION

The Commission:

**Approves** the final site and building plans for the proposed Malcolm X Elementary School Modernization, located at 1500 Mississippi Avenue, SE in Washington, DC.

**Notes** the landscape plans as proposed are consistent with the *Comprehensive Plan for the National Capital* and the guidance in NCPC's *Pollinator Best Practices Resource Guide*.

## PROJECT REVIEW TIMELINE

<b>Previous actions</b>	<b>September 2024</b> – Approval of preliminary site and building plans
<b>Remaining actions</b> (anticipated)	None

## PROJECT ANALYSIS

### Executive Summary

The modernization will improve the indoor and outdoor space for students and staff. The school is located across the street from Oxon Run Parkway, which is administered by the National Park Service. However, the project does not appear to have any direct impacts on the park. The school is set back from parkland and improvements are fully located on District land. Any visual impacts will be limited given the addition has been designed to be compatible and coordinate with the existing school building. Therefore, the project does not appear inconsistent with the Federal Elements of the *Comprehensive Plan for the National Capital*, nor does it impact any identified federal interests. As such, staff recommends the **Commission approve the final site and building plans for the Malcolm X Elementary School Modernization located at 1500 Mississippi Avenue, SE in Washington, DC**. NCPC approved the preliminary plans in September 2024 with no comments. The applicant developed a tree replacement plan and a planting plan that includes pollinator plant species as part of their submission of the final site and building plans.

### Analysis

The existing 63,400-square-foot building cannot support the proposed program requirements for a 21st century school. As such, approximately 20,000 square feet of additional space is proposed. The planned expansion will include administration spaces, classrooms, student dining, and gymnasium. The additions will be located to the southeast of the existing east academic wing along 15th Street, SE to support administrative functions; south and north of the existing west academic

wing to support academic classroom functions; and to the west of the existing building in the available open space to support the gymnasium and student dining functions. The proposal also includes extensive improvements to the site for various age-appropriate play spaces, improved accessibility, outdoor classrooms, and gathering spaces. The project is designed to achieve LEED Gold and net-zero energy. Construction is currently expected to be completed in the first quarter of 2027. As part of the project, a solar array will be installed north of the school, in a cleared area adjacent to the staff parking lot, as well as on the roof of the building. In addition, below-grade geothermal wells will be installed throughout the site.

The school campus rests on a flat graded portion of the sloped site approximately ten feet above the elevation of Mississippi Avenue, SE across from Oxon Run Park and Oxon Run. The building is comprised of a two-story academic wing fronting 15th Street, SE to the east and a three-story academic wing fronting Mississippi Street, SE to the south. The two academic wings form a V-shape with the nodal point oriented to the southeast intersection of 15th Street and Mississippi Avenue. This node forms the main school entrance on the first floor with stair and ramp access from Mississippi Avenue. There is a large single-story multi-use space with stage programmed for student dining, gymnasium, performances, and gatherings to the rear aligned with the main entrance. This space cannot serve the program requirements of a fully modernized elementary school and bisects the site into two distinct areas compromising visual connectedness and security. Therefore, it will be demolished as part of the modernization project.

The gymnasium addition will be located west of the existing building. It is envisioned as a tall single-story volume designed to respect the scale of the original school building. The addition is pulled away from the existing building to create relief between the structures, maintain the existing building envelope, and to retain daylight and views into functional program spaces within the existing building and new additions. Clerestory windows into the gymnasium will allow natural light and limited views into and from the gymnasium. The glazed north wall of the gymnasium stage faces an outdoor play space located between the proposed gymnasium and the student dining addition to the north, creating a double-sided stage for performance and play. The fully-glazed south wall of the student dining faces the proposed open outdoor court intended for dining and play. Both spaces are planned to be available for independent community use after school hours. Additions to the existing portions of the building will expand existing classroom and administrative spaces and improve circulation. The existing façade will be re-clad and is designed with new windows, doors, and exterior walls that combine high insulation thermal values and minimal air leakage. The proposed exterior building materials including brick and exterior high-performance paneling that is intended to provide a contemporary interpretation of the original building materiality. Selected patterns and colors are intended to harmonize with the existing natural site setting. New fixed and operable aluminum framed windows, storefront and doors include projecting horizontal and vertical shading devices are designed to further support net-zero energy goals.

The site design intends to unify the building design with the landscape and enhance the everyday learning experience for students and the work environment for faculty. The site design includes an entry plaza, playground areas, outdoor classrooms, and fields and gardens which all incorporate sustainable site design principles such as bioretention areas and native plantings, including shade

trees, to reduce the urban heat island effect. The site includes a large sloped vegetated area along the north and west sides. While this area is not suitable for construction, this sloped area provides a natural buffer to the adjacent residential neighborhoods and an existing clearing between the site and the wooded area provides space for the solar array. The applicant worked with staff to design the area around the solar array as a pollinator meadow, including Sedges, Columbine, Butterfly Milkweed, Blue Mistflower, and Wild Indigo. Staff supports this approach in lieu of turf grass.

The site includes a few mature shade trees along the Mississippi Avenue, SE and 15th Street, SE corner. Only one of these trees is large enough to fall into the District's "special tree" category and efforts to preserve this tree will be undertaken. A tree inventory included in the plans indicates 22 trees will be removed to complete the modernization project. While a small number of these trees are large, they have significant defects. The plans indicate that 48 trees will be planted as replacements. DGS worked with NCPC staff through consultation to develop a tree replacement plan and a planting plan that includes pollinator plant species as part of the final site and building plans.

## **CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE**

### **Comprehensive Plan for the National Capital**

The school is located across the street from Oxon Run Parkway, which is administered by the National Park Service. However, the project does not appear to have any direct impacts on the park. It is set back from parkland and improvements are fully located on District land. Any visual impacts will be limited given the addition has been designed to be compatible and coordinate with the existing school building. Therefore, the project does not appear inconsistent with the Federal Elements of the *Comprehensive Plan for the National Capital*, nor does it impact any identified federal interests.

### **National Historic Preservation Act**

NCPC has an advisory authority for District projects located outside the Central Area, and therefore National Historic Preservation Act (NHPA) responsibilities.

### **National Environmental Policy Act**

NCPC has an advisory authority for District projects located outside the Central Area, and therefore no National Environmental Policy Act (NEPA) responsibilities.

## **CONSULTATION**

### **Coordinating Committee**

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The Coordinating Committee reviewed the project at their December 18, 2024 meeting and forwarded the final site and building plans to the Commission with the statement that the project has been coordinated with the following participating agencies: NCPC; the General Services Administration; the Washington Metropolitan Area Transit Authority; the District State Historic Preservation Officer; the District Department of Transportation; the District Office of Planning, and the National Park Service.

### **U.S. Commission of Fine Arts**

The Commission of Fine Arts approved the project plans at their November 2024 meeting with no comments.

### **ONLINE REFERENCE**

The following supporting documents for this project are available online at [www.ncpc.gov](http://www.ncpc.gov):

- Submission Package
- Project Summary

Prepared by Jamie Herr  
12/30/2024

### **POWERPOINT (ATTACHED)**

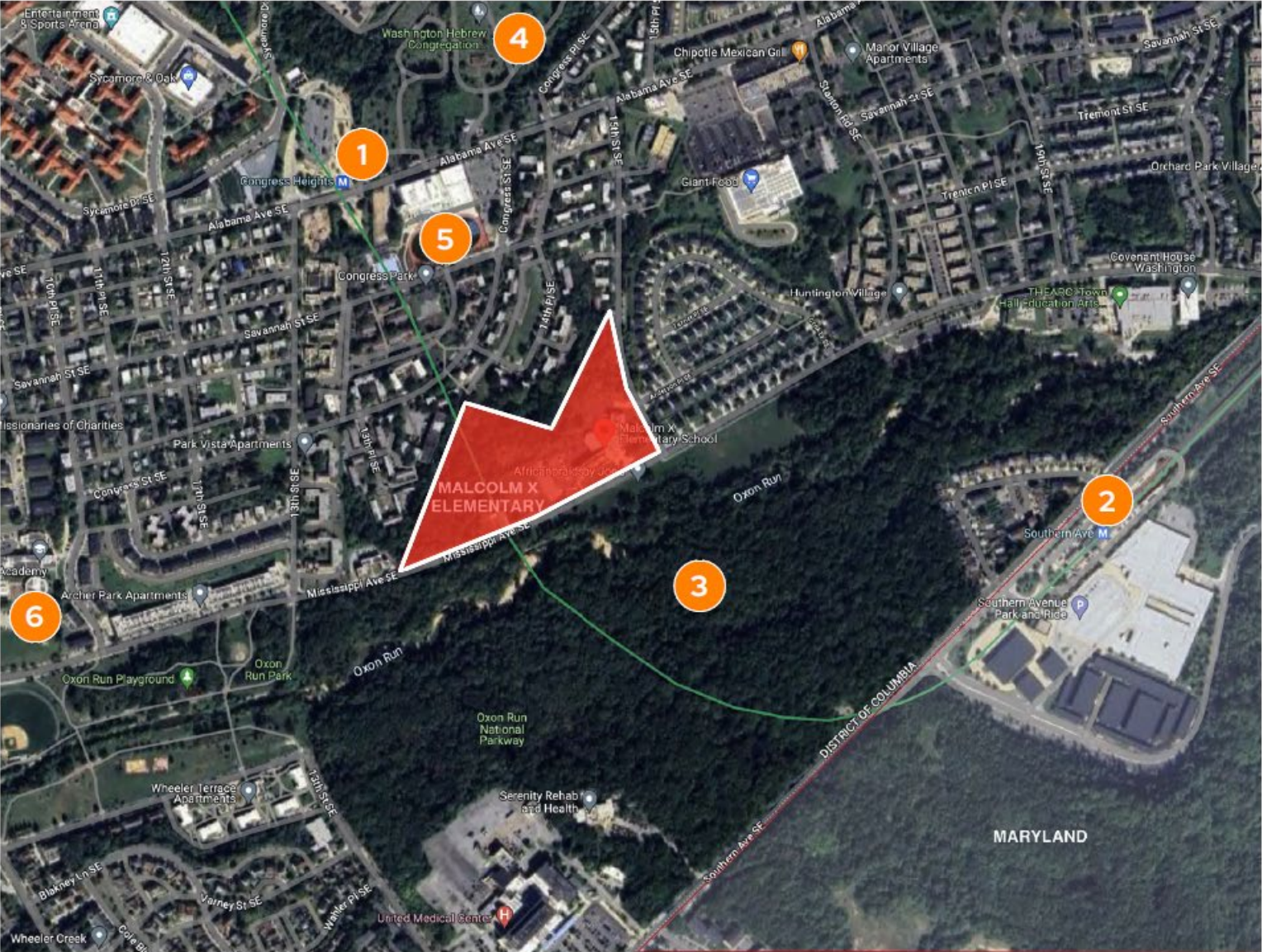
# Malcolm X Elementary School Modernization

1500 Mississippi Avenue, SE, Washington DC

Approval of Final Site and Building Plans

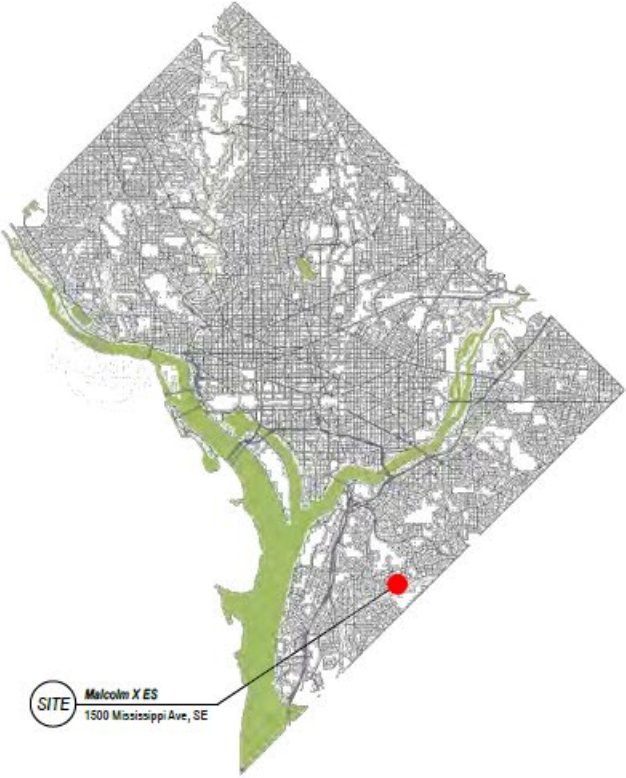
District of Columbia Department of General Services

# Site Context

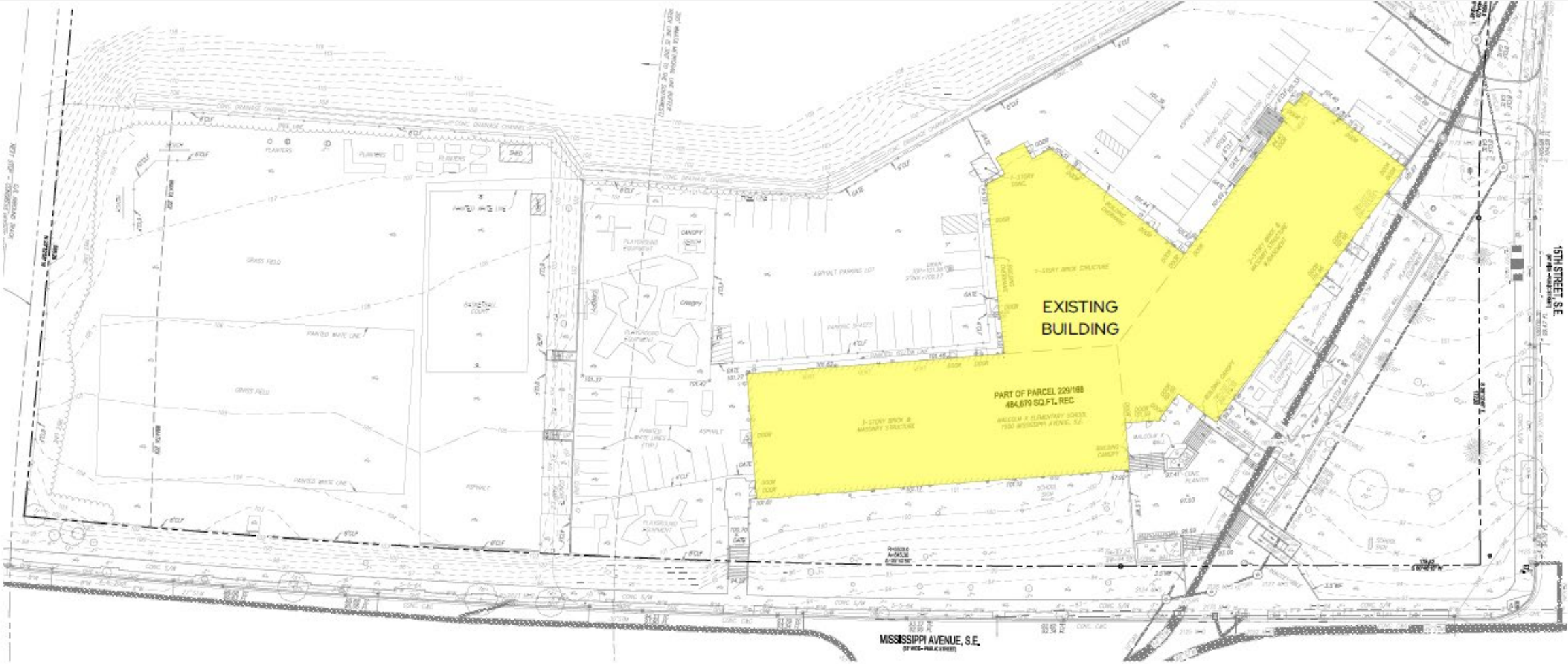


**KEYED NOTES :**

- 1 CONGRESS HEIGHTS METRO STATION
- 2 SOUTHERN AVENUE METRO STATION
- 3 OXON RUN NATIONAL PARKWAY
- 4 WASHINGTON HEBREW CONGREGATION
- 5 BARD HIGH SCHOOL EARLY COLLEGE
- 6 EAGLE ACADEMY



# Existing Conditions



# Existing Circulation

## LEGEND

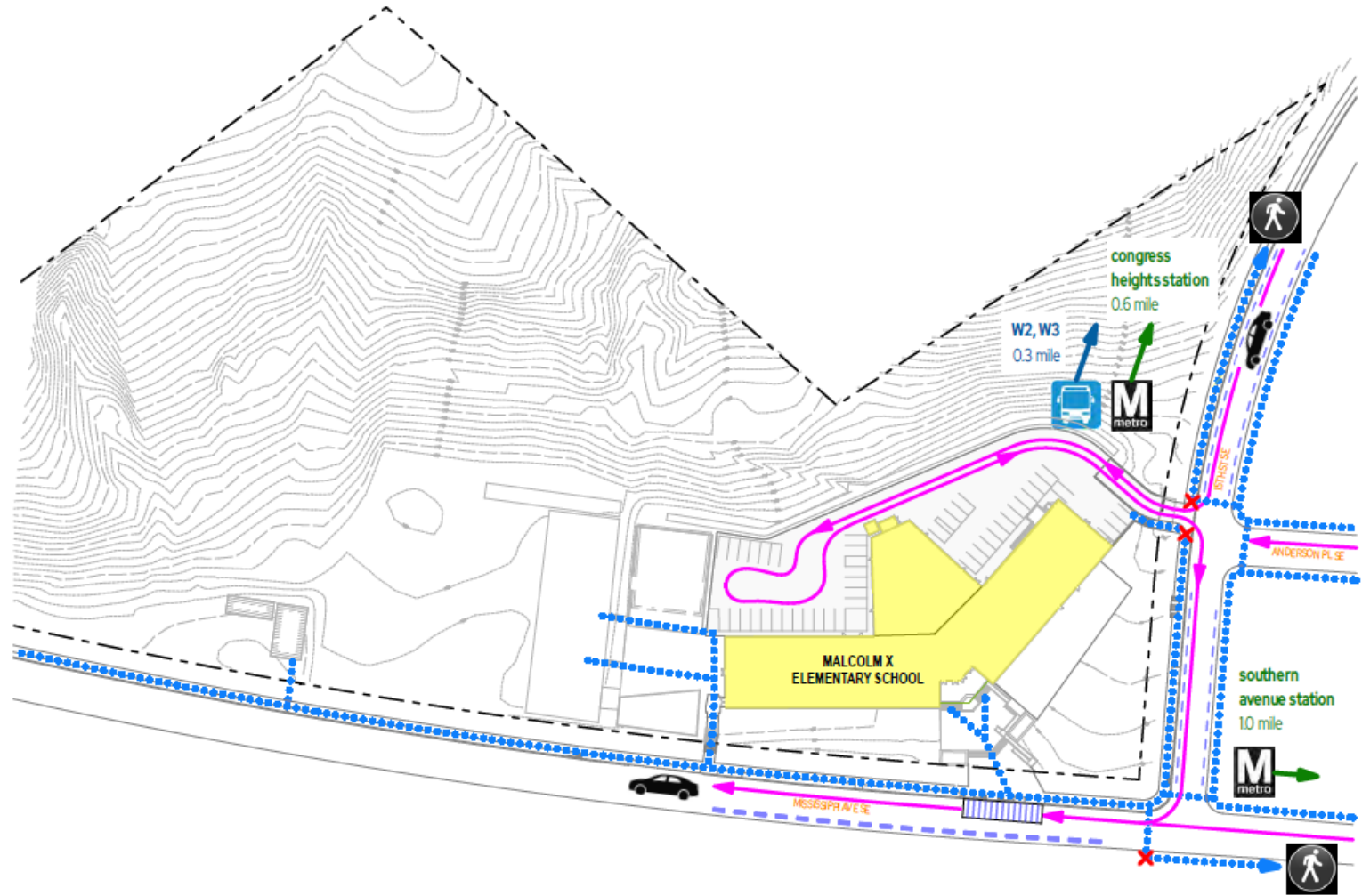
-  Pedestrian Sidewalk
-  Sidewalk Termination
-  Vehicular Access
-  School Bus Drop-off
-  Public transportation - Metro Station
-  Public transportation - Bus Stop
-  Public and DCPS Permitted Parking
-  Street Parking

## Transportation and Circulation

The Malcolm X Elementary School is located at 1500 Mississippi Avenue SE, at northwest corner of the Mississippi Avenue SE & 15<sup>th</sup> Street SE intersection. The site is bounded by a wooded hillside and apartment buildings to the north, Metrorail service facilities property to the west, Mississippi Avenue SE to the south, and 15<sup>th</sup> Street SE to the east. The proposed modernization project is planned to be completed by the 2026-2027 school year and proposed to support a planned enrollment of 275 students with 80 staff. Vehicular and loading access to the project will remain consistent with existing conditions and be available via an existing curb cut on 15<sup>th</sup> Street SE. The project includes a loading area that supports on-site loading and head-in/head-out movements through public space. The project's loading area will meet all applicable requirements.

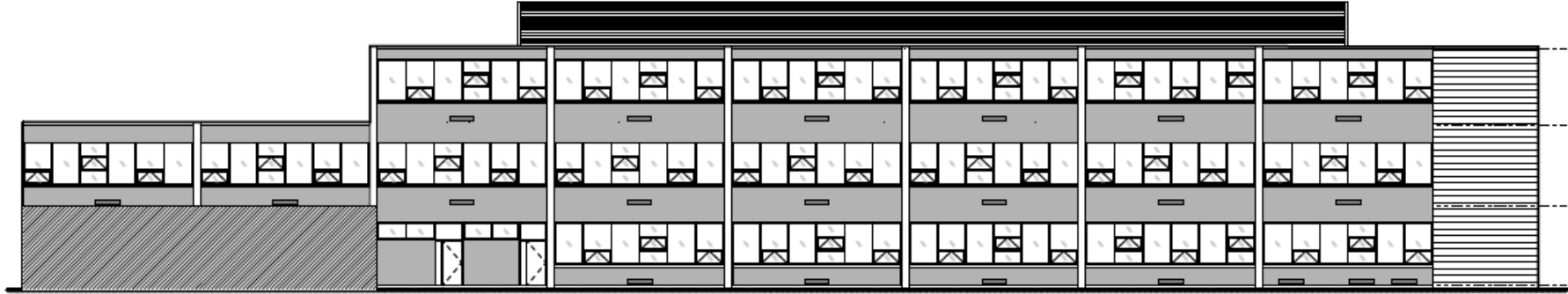
The proposed development will not have a detrimental impact on the surrounding transportation and no mitigation measures are warranted. Additionally, the Malcolm X Elementary School modernization project has several positive design elements that minimize potential transportation impacts, including:

- Close proximity to transit, including the Congress Heights and Southern Avenue Metrorail stations
- Access to existing and future bicycle infrastructure;
- A location within a well-connected pedestrian network; and
- Bicycle parking in a convenient and secure location.

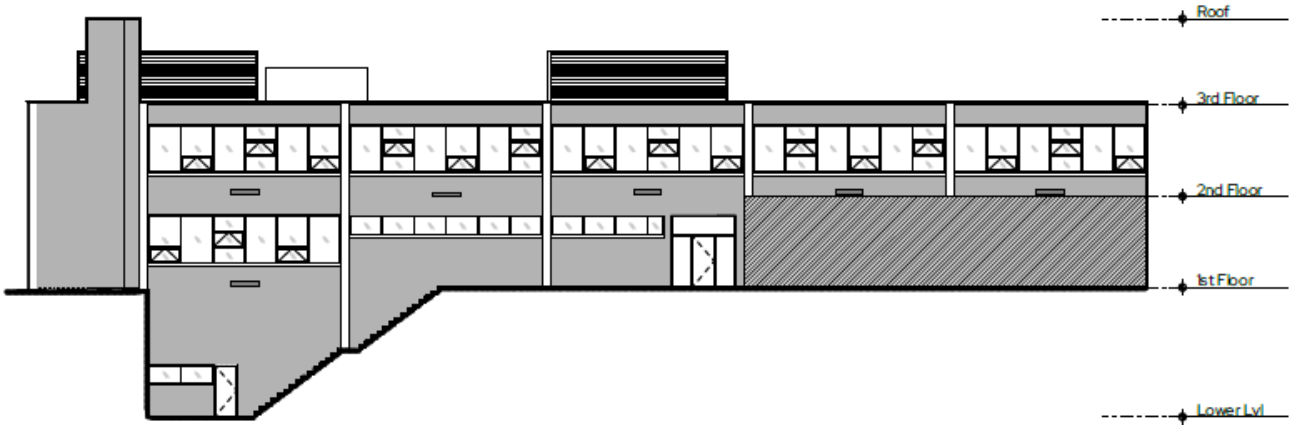


CIRCULATION & ACCESS

# Existing Conditions



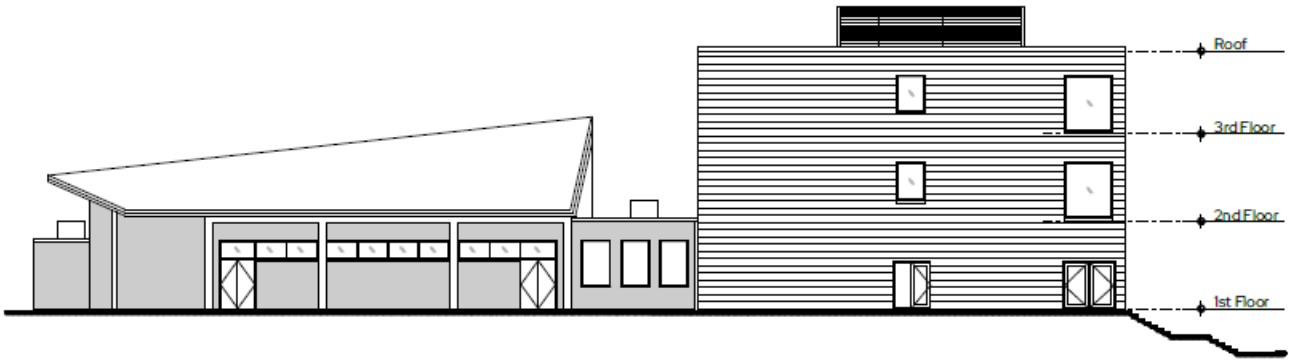
1 West Wing - Northwest Elevation



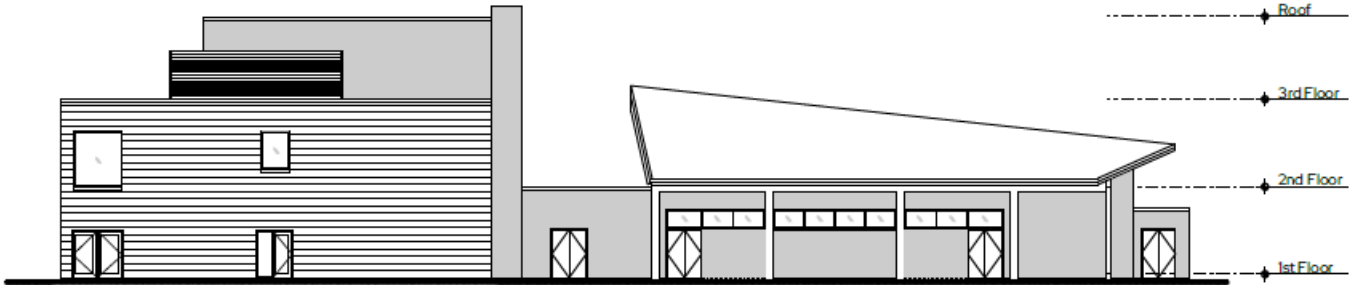
2 East Wing - West Elevation



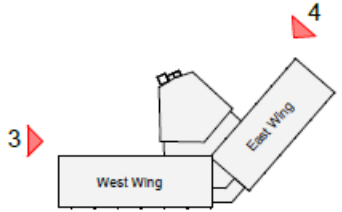
# Existing Conditions



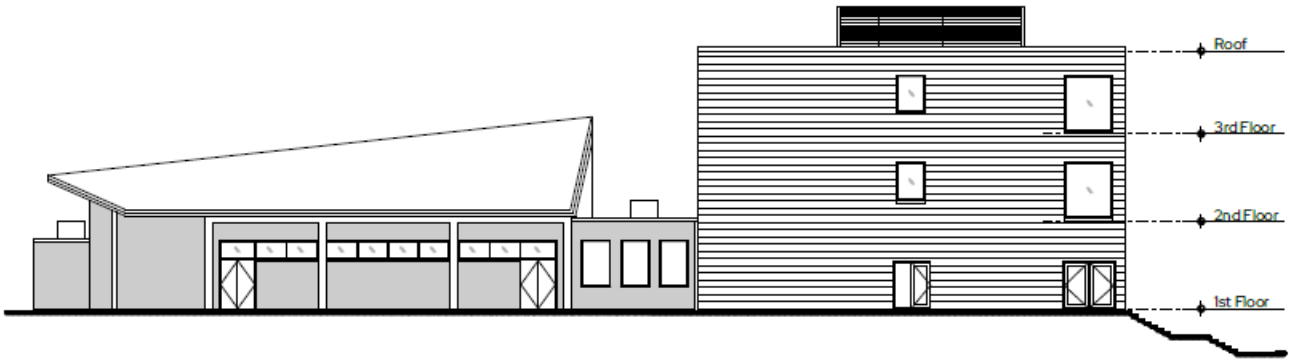
3. West Wing - Southwest Elevation



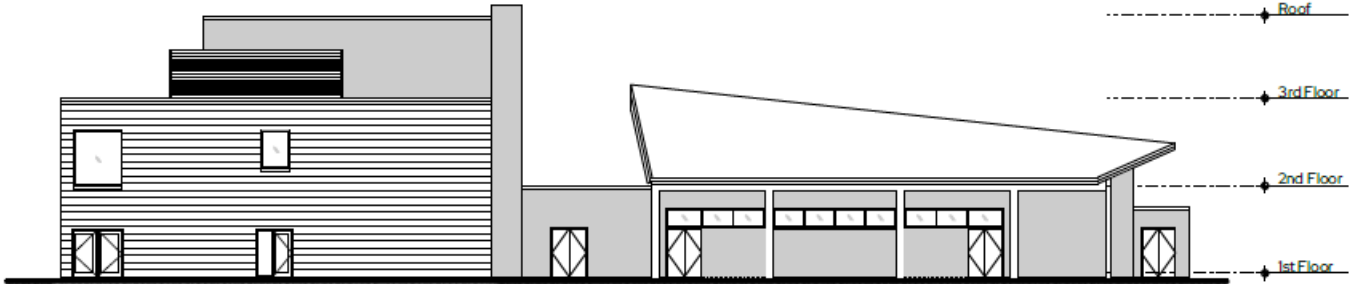
4. East Wing - North Elevation



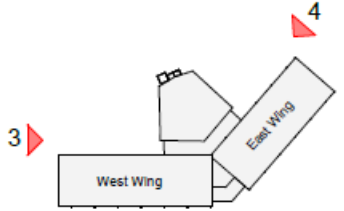
# Existing Conditions



3. West Wing - Southwest Elevation



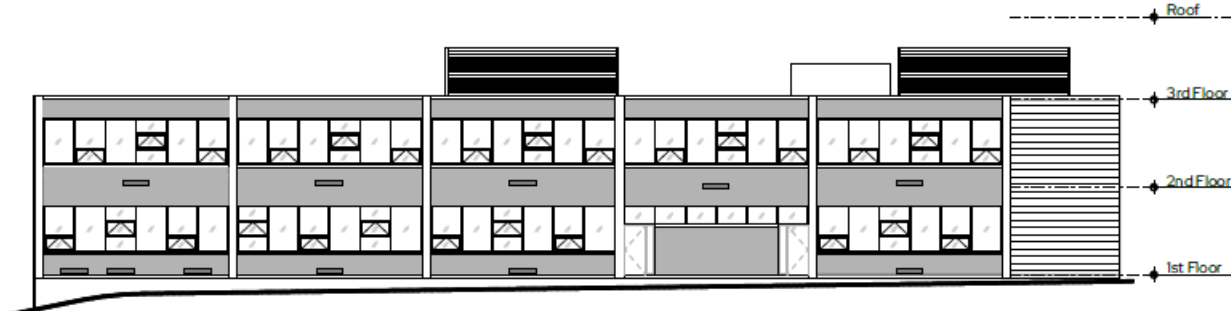
4. East Wing - North Elevation



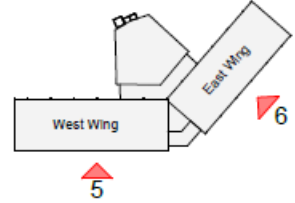
# Existing Conditions



5. West Wing - Southeast Elevation



6. East Wing - East Elevation



# Existing Conditions



West Wing from Mississippi Avenue



Main Building Entrance from Mississippi Avenue



East Wing Elevation from Mississippi Avenue Entrance



East Wing Rear Elevation



Cafeteria Northeast Elevation



West Wing Rear Elevation

# Existing Conditions



Cafeteria North Elevation



West Playfields



North Hillside and Site Gutter



Parking and Site to Northwest from Roof

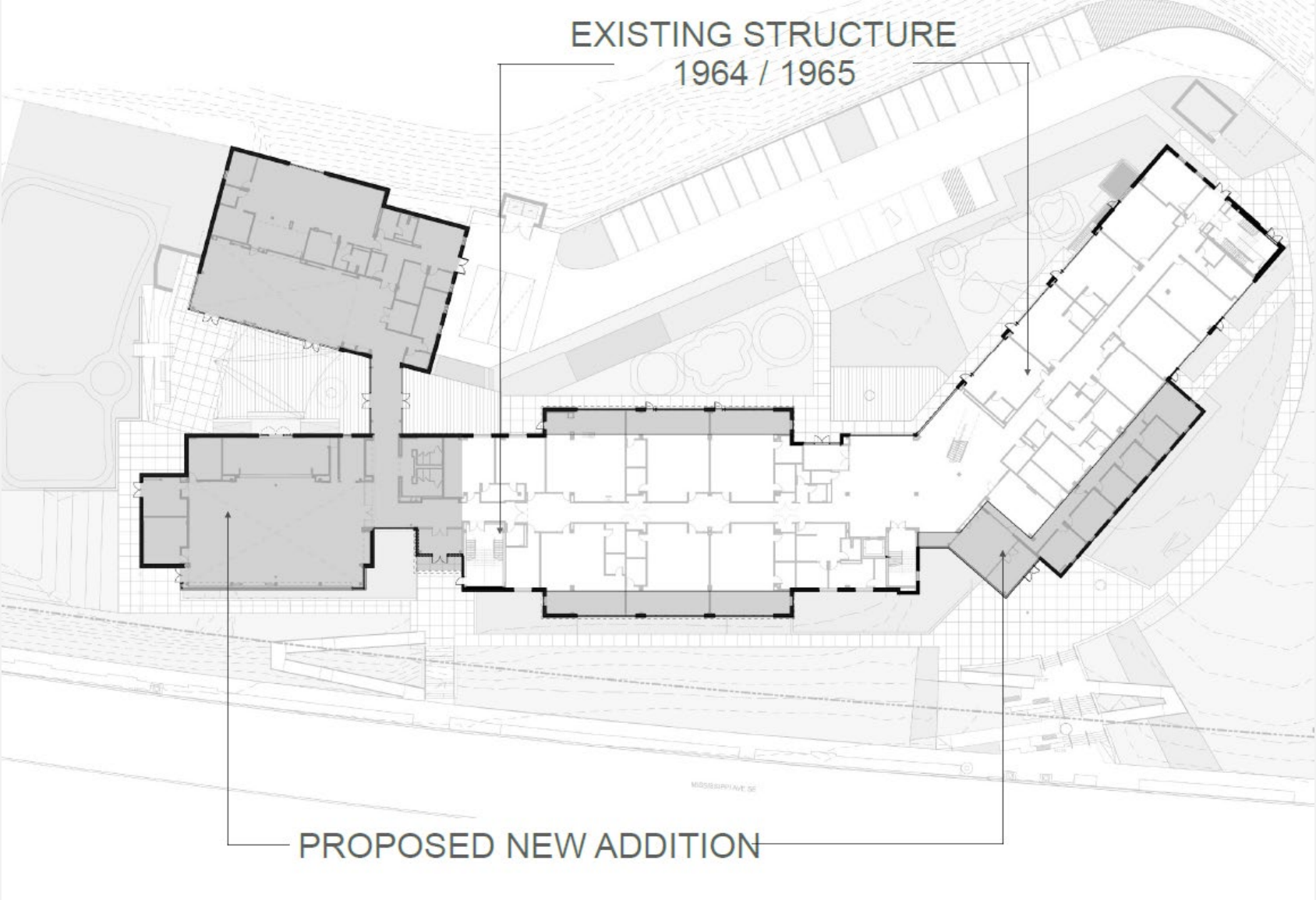


Site to North from Roof

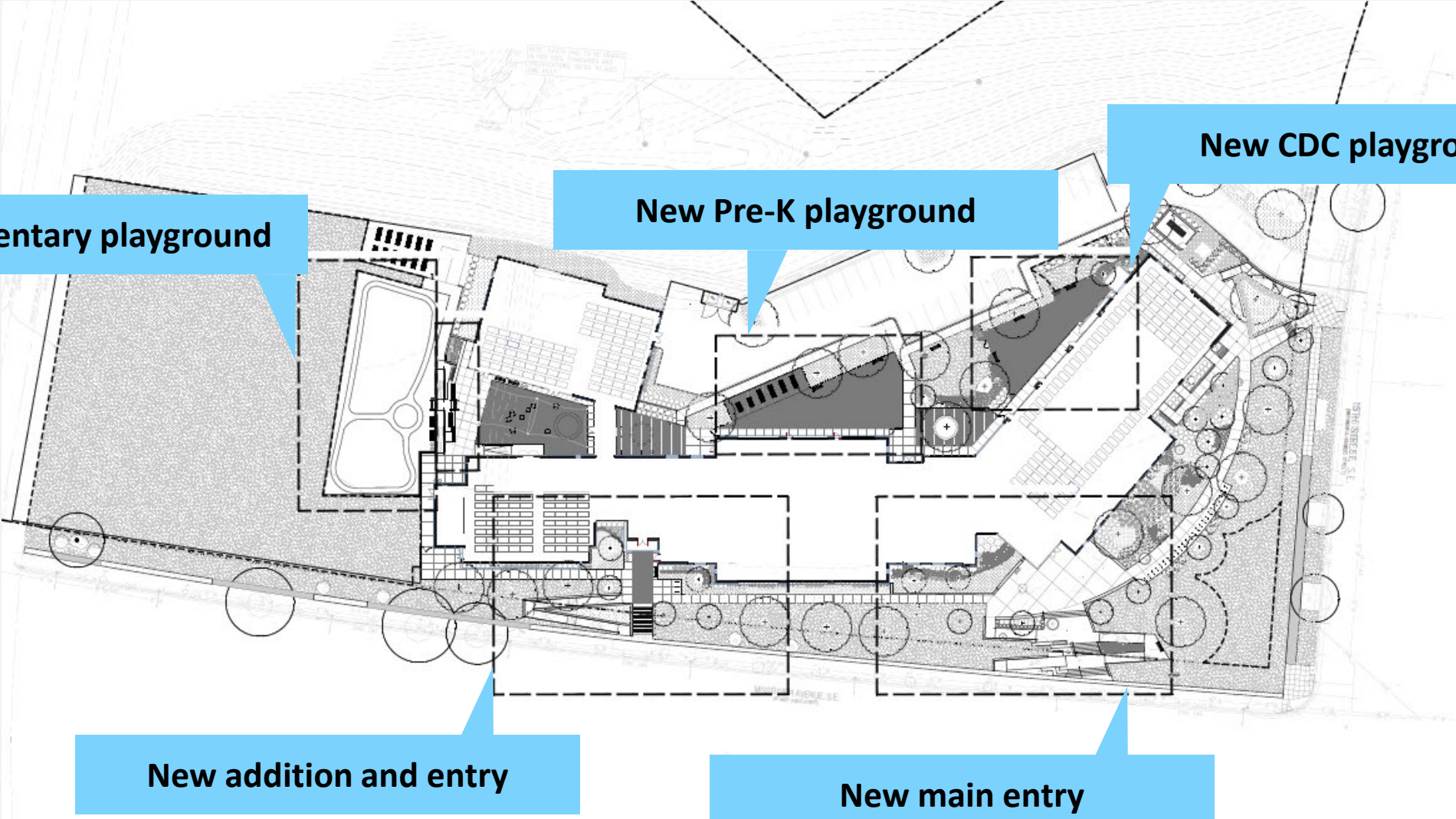


Parking and Site to Northeast from Roof

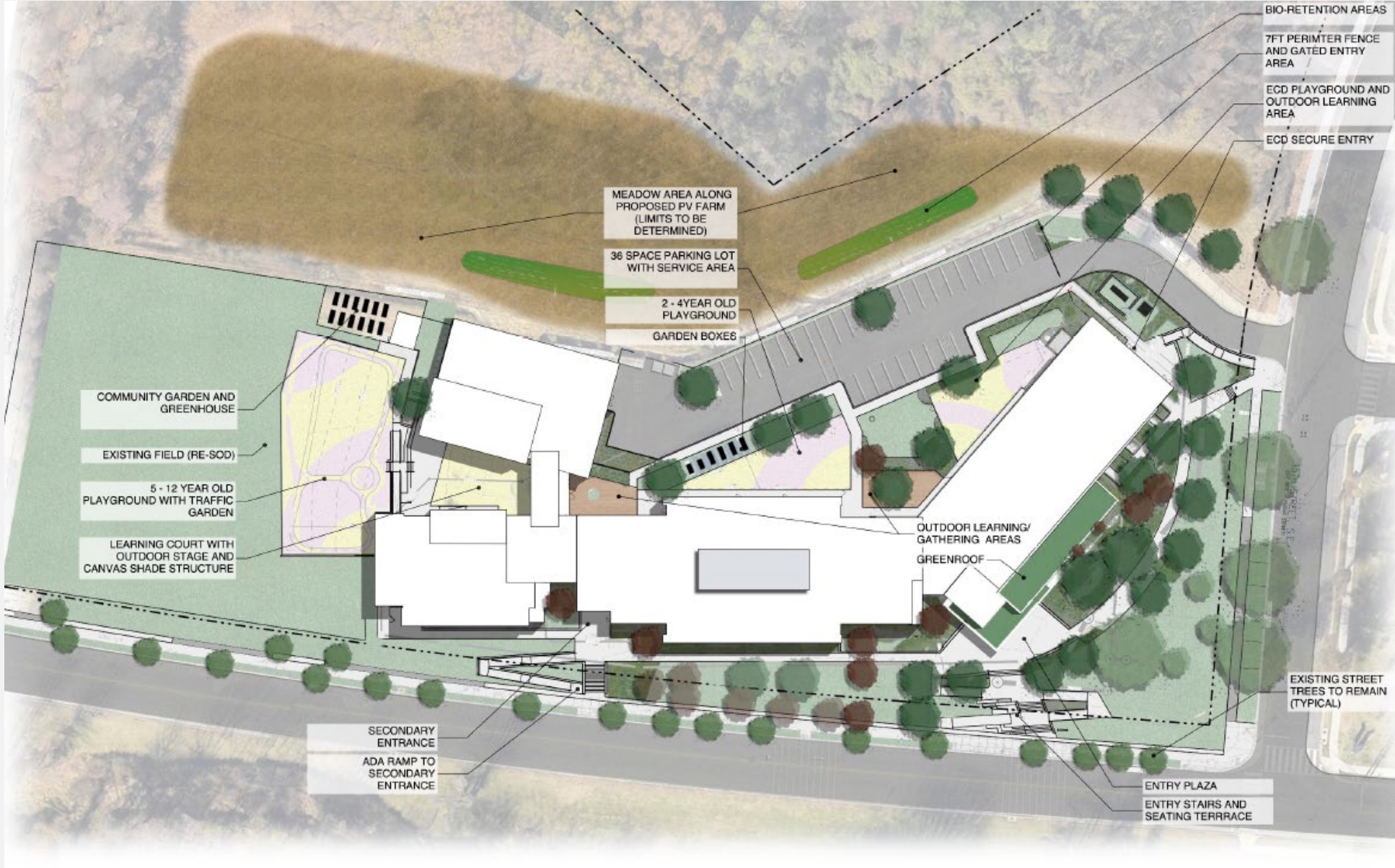
# Proposed Additions



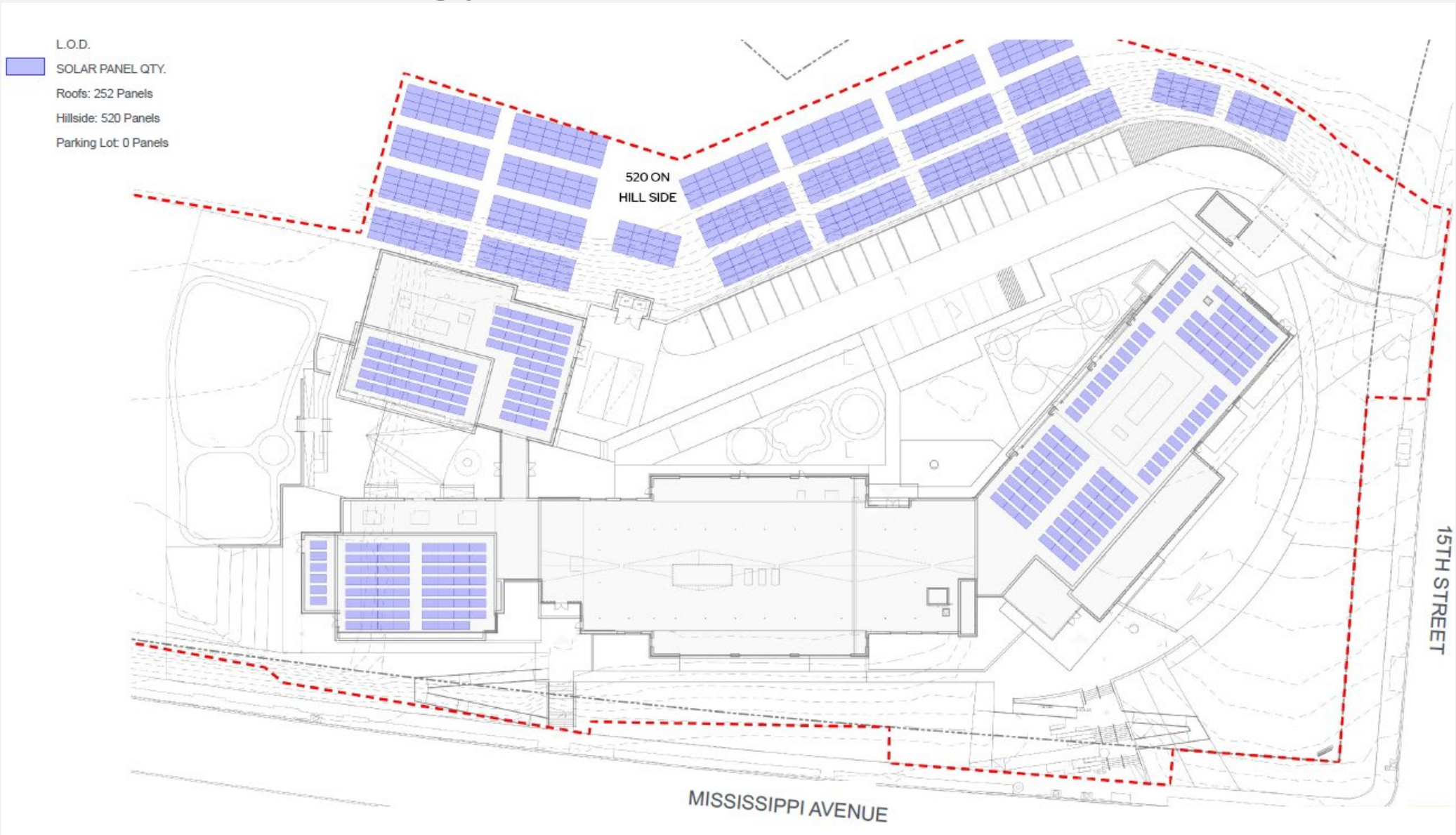
# Proposed Site Plan



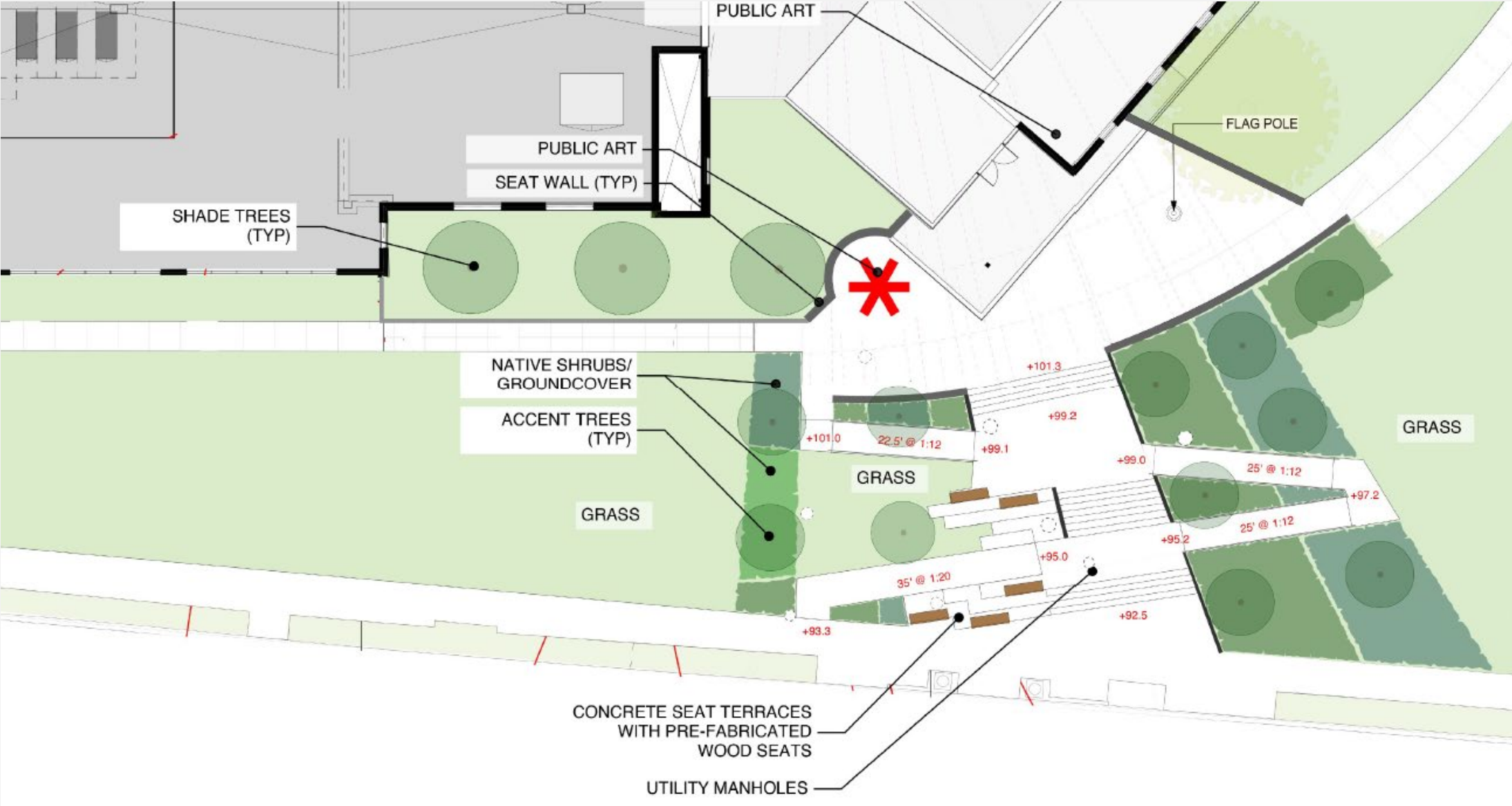
# Illustrative Site Plan



# Proposed Solar Energy Infrastructure



# Main Entry Stairs and Ramp



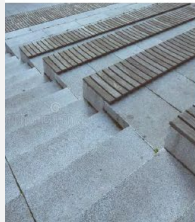
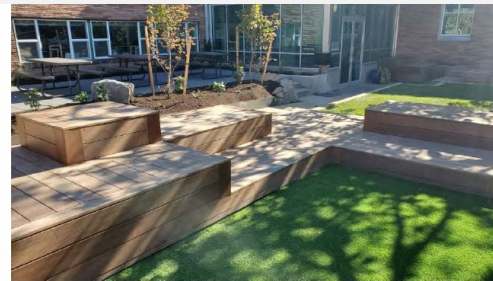
# Landscape Precedents



LANDSCAPE PRECEDENT IMAGES



LANDSCAPE PRECEDENT IMAGES



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LANDSCAPE PRECEDENT IMAGES

# Landscape Precedents







# Meadow Planting Plan

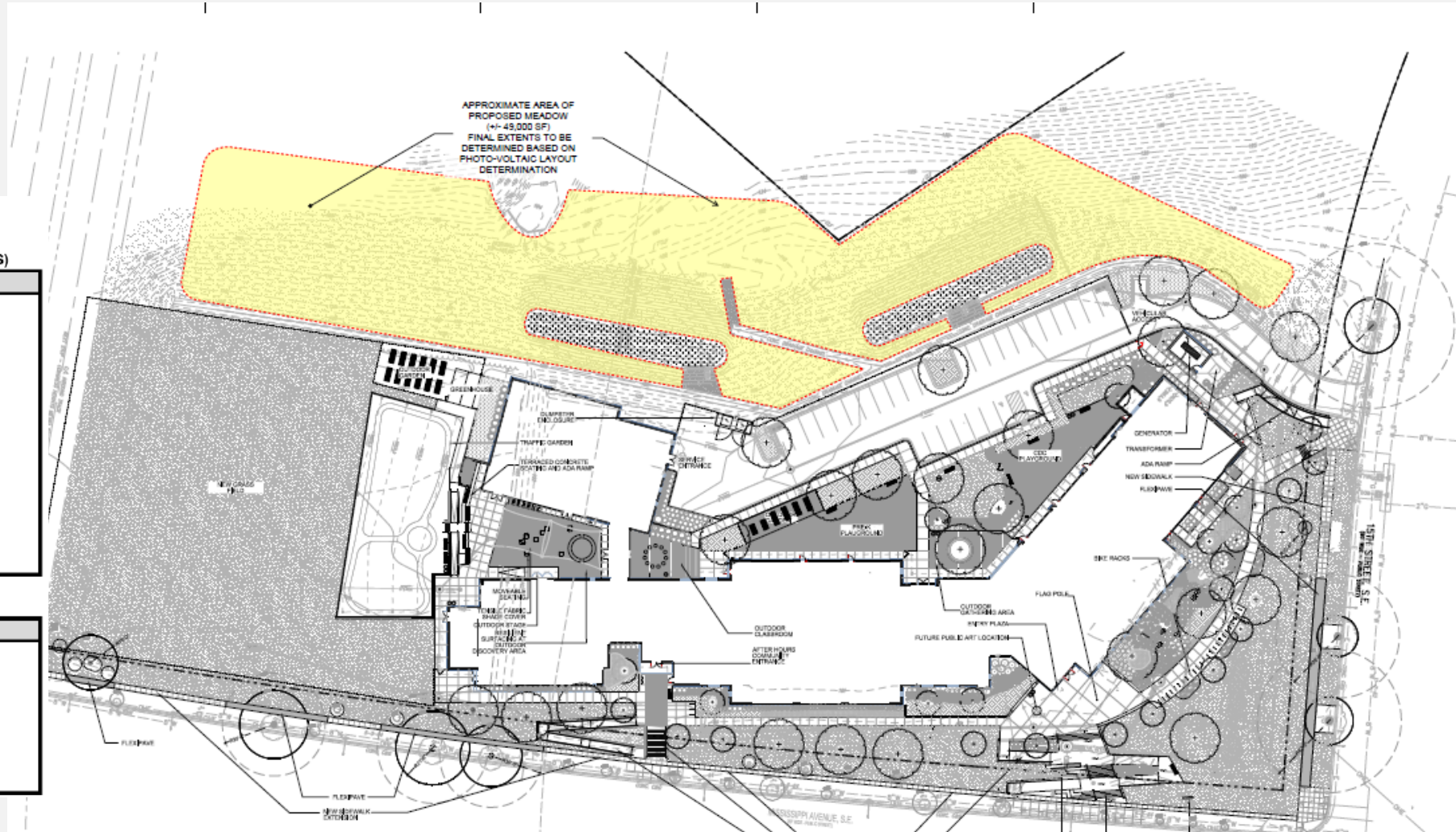
## MEADOW SEED MIX

### FIRST GROWING SEASON (ANNUALS, BIENIALS, FAST-EMERGING PERENNIALS)

COMMON NAME	BOTANICAL NAME
Columbine	Aquilegia (Spp.)
Common Bonisete	Eupatorium perfoliatum
Black-eyed Susan	Rudbeckia hirta
Foxglove Beardtongue	Penstemon digitalis
Common Oat	Avena sativa
Winter Wheat	Triticum aestivum
Cereal Rye	Secale cereale
Partridge Pea	Chamaecrista fasciculata
Sedge	Carex (Spp.)
Swamp Sunflower	Helianthus angustifolius
Tickseed	Coriopsis (Spp.)
Virginia Wild Rye	Elymus virginicus
Wild Bergamot	Monarda fistulosa

### 2ND AND 3RD GROWING SEASONS (LONG LIVED PERENNIALS)

COMMON NAME	BOTANICAL NAME
Blue Mistflower	Conoclinium coelestinum
Butterfly Milkweed	Asclepias tuberosa
Closed Bottle Gentian	Gentiana andrewsii
Culver's Root	Veronicastrum virginicum
Little Bluestem	Schizachyrium scoparium
Mountain Mint	Pycnanthemum Spp.
Wild Indigo	Baptisia Spp.



# Building Façade Materials



# Proposed SE Aerial View



# Proposed SW Aerial View



# View of Main Entry



# View of Admin Wing from NE Corner



# View of Main Entry Stairs and Ramp



National Capital Planning Commission Meeting  
January 9, 2025

File Number 8579: Malcolm X Elementary School Modernization  
Agency: District of Columbia Department of General Services

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On January 4, 2024, NCPC staff issued its [Pollinator Best Practices Resource Guide \(NCPC File Number 8510\)](#) (Reference 1). The Guide summarizes information in federal documents and other sources that support the restoration of falling populations of honeybees, monarch butterflies, and other pollinators.

Page 21 (Meadow Planting Plan) in the project synopsis (summary) for this submission contains a list of plants in each of two meadow seed mixes. However, several entries and omissions in the seed mixes and in other sections of the synopsis are not consistent with the NCPC Guide's recommendations. These include:

### **Milkweeds**

#### **Common Milkweed (*Asclepias syriaca*)**

Monarch butterfly caterpillars feed only on milkweeds. However, the seed mix does not contain does not contain Common Milkweed ([Asclepias syriaca](#)).

The NCPC Guide states on page 5: *“There are over 100 different species of milkweeds that are considered native to North America, one of which stands out - *Asclepias syriaca*, or common milkweed. According to the U.S. Forest Service (Reference 2), Common milkweed is, “...among the most important food plants for Monarch caterpillars,” and, “Nature’s mega food market for insects. Over 450 insects are known to feed on some portion of the plant. Numerous insects are attracted to the nectar-laden flowers and it is not at all uncommon to see flies, beetles, ants, bees, wasps, and butterflies on the flowers at the same time.” The Xerces Society has also identified Common milkweed as a priority species for habitat restoration efforts. Common milkweed also quickly spreads through rhizomatous roots and forms colonies which aids in its longevity. **Therefore, common milkweed is clearly an important species that is critical to the survival of monarch butterflies. .... Within meadows and designed landscapes, common milkweed should be planted along with a diversity of other milkweed species on***

***federal landscape plans to the fullest extent possible and as appropriate for the site conditions.”***

A 2014 Xerces Society publication states that studies have indicated that the majority (85-92%) of monarch butterflies overwintering in Mexico had fed on common milkweed as caterpillars. The publication further states: “*Studies such as these demonstrate that the protection of common milkweed populations is essential to sustain eastern monarch populations.*” (Reference 3)

A publication that the Arlington County Department of Parks and Recreation’s natural resources manager, Alonso Abugattas, authored in 2020 states: “***Milkweeds – Asclepias are well documented as being wonderful pollinator plants, as well as the host plants for such Lepidoptera as Monarch butterflies and at least 11 other documented species. .... The local monarch favorite is Common Milkweed (A. syriaca), .....***” (Reference 4).

A 2024 article that Chip Taylor, the founder of Monarch Watch, authored states: “*Although monarch larvae are known to feed on about 30 of the more than 70 species of milkweeds known to occur in the United States and Canada, the eastern migration is largely dependent on three of these species, Asclepias syriaca, A. viridis and A. asperula. In fact, it is probably safe to say that there would be no eastern migration without these three species.*” (Reference 5). *Asclepias syriaca* is the only one of those three species that is native to the National Capital Region and its vicinity.

Although *Asclepias syriaca* spreads through rhizomatous roots and forms colonies, routine maintenance can easily control the plant’s spread. Mowing or removal of unwanted plants two or three times a year will stop the spread.

*Asclepias syriaca* is tolerant of light shade but generally is a full sun species. The plant’s large clusters of greenish-pink to rosy pink to purplish-pink flowers bloom in June and July (Reference 2).

Monarch Watch’s 2010 description of Common Milkweed states that the plant's natural habitat includes ditches (Reference 6). Therefore, install the plant in the project's bioretention areas. Those areas will receive at least as much water as ditches usually do. Also replace species in the planting plan that thrive in sunny areas with *Asclepias syriaca* if needed to provide space for that milkweed.

**Therefore, add much *Asclepias syriaca* to the meadow seed mixes and to other parts of the project's planting plan.**

### Butterfly Milkweed (*Asclepias tuberosa*)

The meadow seed mix for the 2nd and 3rd growing seasons contains Butterfly Milkweed ([Asclepias tuberosa](#)). However, the NCPC Guide states on page 5: *“Studies have shown that Monarch butterflies lay fewer eggs on some milkweed species, such as Asclepias tuberosa, than on others”*.

A 2018 article that V.M. Pocius, et al., published in a scientific journal reported that reproducing monarchs laid few eggs on *Asclepias tuberosa* and proposed several reasons for this (Reference 7). A 2019 article in a Butterfly Society of Virginia publication entitled “Growing Milkweed” confirmed this finding when stating: *“I’ve found that butterfly weed is the least favorite of my Monarch guests in my Virginia Beach garden for laying eggs (perhaps the leaves are tougher)?”* (Reference 8).

Your proposed plantings of *Asclepias tuberosa* will do little to help restore declining populations of monarch butterflies. Therefore, **replace *Asclepias tuberosa* with *Asclepias syriaca*.**

### Additional Plantings

**Add Black Cherry ([Prunus serotina](#))** to the planting plan. This tree's white flowers bloom from March through June (Reference 9). An [EcoBlog web page](#) states: *“Native to most of the Eastern half of the U.S., Black Cherry offers nectar and pollen to native pollinators and honey bees. The small red or black fruits are a favorite food of more than 40 species of birds, not to mention, many mammals.*

*Black Cherry also serves as the host plant for an amazing array of butterflies and moths – more than 450 species, including: Eastern Tiger Swallowtail, Cherry Gall Azure, Viceroy, Columbia Silkmoth, Promethea Moth, Small-eyed Sphinx Moth, Wild Cherry Sphinx Moth, Banded Tussock Moth, Band-edged Prominent, Spotted Apatelodes and Red-Spotted Purple”* (Reference 10).

Also **add Sassafras ([Sassafras albidum](#))** to the planting plan. This tree's fragrant yellow-green flowers bloom from March through May, providing nectar and pollen to honey bees and many native pollinators (Reference 11). Birds and mammals eat

the tree's blue-black fruits. Caterpillars of the locally-native Spicebush Swallowtail, Eastern Tiger Swallowtail, and Palamedes Swallowtail butterflies and Promethea, Imperial and Io moths feed on its foliage, as do those of more than 30 other species of butterflies and moths (References 12 and 13).

Alonso Abugattas has written: “*My all-time favorite pollinator shrub is Buttonbush ([Cephalanthus occidentals](#)). I've not only seen tons of bees, butterflies, wasps and even hummingbirds nectar on the fragrant white globular flowers, but you'd be amazed at all the pollinators who visit the flower heads at night. I've seen many moths, beetles, and other nocturnal fliers attracted to the white blooms and their perfume. .... This multi-stemmed shrub can grow to 20' (though 5'-12' is more typical) right in the water, though it can take drier conditions as well .... Where it gets sufficient sun, it can bloom profusely, and often for more than a month at a time. .... At least 24 different bird species have been recorded eating the nutlets (about 8 of these being waterfowl). Nineteen different caterpillar species have been found to feed on it as well, ....*” (Reference 14).

Buttonbush's natural habitat includes areas with moist, poor drainage or standing water such as in the margins of lakes, ponds, marshes, swamps, streams, and creeks. Therefore, **plant Buttonbush in the project's bioretention areas.**

### **Native Species**

The NCPC Guide states on page 4 that the U.S. Department of Agriculture's (USDA's) 2023 Maryland Wildflower Habitat Establishment Guide suggests the following in plant species selection:

*“100% Native Species. Focus plant selection on native perennials that provide pollen- and nectar-rich forage for pollinators and beneficial insects, and larval food plants for butterflies and moths. Native trees and shrubs are essential components of habitat needed to support a wide variety of wildlife ....”* In addition, many non-native plants are either presently recognized as invasive or may become so in the future.

It may take a long time for a non-native plant to become designated as invasive after it has been introduced into an area. For example, Japanese Honeysuckle (*Lonicera japonica*) was first introduced in 1806 as an ornamental ground cover. It slowly escaped cultivation and became widely established by the early 1900s, **a century after its initial introduction.** This plant is now an aggressive, invasive vine that readily colonizes new habitats (Reference 15).

The meadow seed mixes contain four plants that are **not native to North America**. These are:

- Common Oat (*Avena sativa*). *Avena sativa* is native only to southwestern Asia (Reference 16).
- Winter Wheat (*Triticum aestivum*). *Triticum aestivum* is native only from the Transcaucasus to Israel and northwestern Iran, southern Pakistan and northwestern India (Reference 17).
- Cereal Rye (*Secale cereale*). *Secale cereale* is native only to southern Turkey (Reference 18). The plant has been [found outside of cultivation in the District of Columbia and in Pennsylvania and many other states](#).

**Do not plant any of those three non-native plants.**

The descriptions of meadow seed mixes provide the genus of each of four plants, but do not provide their species. However, many plants in these genera are not native to the National Capital Region and its vicinity. They may become invasive if planted there. Further, they may not support native pollinators and other insects.

Therefore, only install species of each of the following genera that are native to the National Capital Region:

- Columbine (*Aquilegia spp.*). Native species: Eastern Red Columbine ([Aquilegia canadensis](#)).
- Sedge (*Carex spp.*). Native species: Pennsylvania Sedge ([Carex pensylvanica](#)); Plantain-Leaved Sedge ([Carex plantaginea](#)); Tussock Sedge ([Carex stricta](#)); Fringed Sedge ([Carex crinita](#)).
- Tickseed (*Coreopsis spp.*). Native species: Lanceleaf Coreopsis ([Coreopsis lanceolata](#)); Threadleaf Coreopsis ([Coreopsis verticillata](#)).
- Mountain Mint (*Pycnanthemum spp.*). Native species: Virginia Mountain Mint ([Pycnanthemum virginianum](#)); Hoary Mountain Mint ([Pycnanthemum incanum](#)); Blunt Mountain Mint ([Pycnanthemum muticum](#)).
- Wild Indigo (*Baptista spp.*). Native species: Yellow Wild Indigo ([Baptisia tinctoria](#)); Blue Wild Indigo ([Baptisia australis](#)).

A 2023 United States Department of Agriculture publication entitled "*Maryland Wildflower Habitat Establishment Guide: Planting for Pollinators and Beneficial Insects*" states on page 5 regarding species selection for seed mixes, "... non-competitive native bunch grasses may be included for herbaceous plantings at a

low rate — **less than 25% of the mix**. When monarch habitat is the primary purpose, criteria for the target plant community require that at least 1.5% of the seeds in the mix should be native milkweeds and at least 60% should be nectar plants.” (Reference 19).

The meadow seed mixes contain the following wind-pollinated grasses and sedges:

- Common Oat (*Avena sativa*)
- Winter Wheat (*Triticum aestivum*)
- Cereal Rye (*Secale cereale*)
- Sedge (*Carex spp.*)
- Little Bluestem (*Schizachyrium scoparium*)

**Ensure that the selected grasses and sedges will comprise less than 25% of each of the two meadow seed mixes.**

Page 18 of the synopsis contains images of “Landscape Precedents”. The following “precedent” is **not native to North America**:

- Weeping Love Grass (*Eragrostis curvula*). This herbaceous plant is native only to Africa (Reference 20). *E. curvula* is on the lists of the [Non-Native Invasive Plants of Arlington County, Virginia](#), the [Non-Native Invasive Plants of the City of Alexandria, Virginia](#), and the [Maryland Cooperative Extension of the University of Maryland](#), among others.

The “Landscape Precedents” also show the following three “precedents” that are native to the United States but are **not native to the National Capital Region**:

- Dwarf Southern Magnolia (*Magnolia grandiflora*). This shrub is native only to the coastal plain from extreme southeastern Virginia to Florida and west to eastern Texas (Reference 21).
- Purple Coneflower (*Echinacea purpurea*). This perennial plant is native only from Georgia to extreme northeastern Texas and north to North Carolina, Ohio, Illinois, and Iowa (Reference 22).
- Mexican Feather Grass (*Nassella tenuissima*). This herbaceous plant is native only to the mountains of west Texas and southern New Mexico south to central Mexico and in southernmost South America in Argentina and Chile (Reference 23). *N. tenuissima* has been [found outside of cultivation in California](#).

**Do not install any of those four non-native “precedent” plants.**

To best support monarch butterflies and other native pollinators, I suggest that you select plants from the following lists:

- United States Department of Agriculture (2018). [Maryland Larval Host and Nectar Plants For Monarchs](#). Only select plants that are checked in columns “P” (Piedmont) and “CP” (Coastal Plain) regions. (Note: This list does not contain any trees or shrubs.)
- Xerces Society for Invertebrate Conservation (2023). [Native Plants for Pollinators & Beneficial Insects: Mid-Atlantic](#). (Note: This list is less specific to plants native to Maryland and its vicinity than is the U.S. Department of Agriculture’s list.)
- Monarch Watch (2015). [Plants for Butterfly and Pollinator Gardens: Native and Non-native Plants Suitable for Gardens in the Northeastern United States](#). Only select plants that are checked in columns “N” (Native) and “M-A” (Mid-Atlantic). (Note: This list is less specific to plants native to Maryland and its vicinity than is the U.S. Department of Agriculture’s list.)

The [United States Department of Agriculture’s PLANTS Database](#) contains maps that identify the native distributions of plants in the above lists.

Thank you.

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18. Royal Botanic Gardens Kew. [Secale cereale](#). Plants of the World Online. “*The native range of this species is a cultigen from S. Türkiye.*”
19. [Maryland Wildflower Habitat Establishment Guide: Planting for Pollinators and Beneficial Insects](#). Page 5: “***Species Selection - Native Species:*** “*Focus plant selections on native perennials that provide pollen- and nectar-rich foliage for pollinators and beneficial insects, and larval food plants for butterflies and moths. For herbaceous plantings, non-competitive bunch grasses (e.g., broomsedge, little bluestem, purpletop) may be included at a low rate — less than 25% of the mix based on pure live seed (PLS) per square foot. ....*  
***Specialized Monarch Habitat:*** *When monarch habitat is the primary purpose, criteria for the target plant community requires at least 1.5% native milkweeds (the larval food source) and at least 60% monarch nectar plants that bloom when adult monarchs are present in the local area (breeding and migration).*”
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22. [Echinacea purpurea](#). Plant Database. Lady Bird Johnson Wildflower Center, The University of Texas at Austin. “***Native Distribution:*** *GA to extreme n.e. TX, n. to NC, OH, IL & IA*”

23. [Nassella tenuissima](#). Plant Database. Lady Bird Johnson Wildflower Center, The University of Texas at Austin. “***Native Distribution:*** *Mountains of west Texas and southern New Mexico south to central Mexico. A separate native population in southernmost South America in Argentina and Chile.*”

Thank you.

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