

NATIONAL COALITION TO SAVE OUR MALL

INITIAL COMMENTS FOR SCOPING

PROPOSED REHABILITATION OF CONSTITUTION GARDENS

May 22, 2014

- The “Public Scoping Notice” treats the preparation of the next EA for Constitution Gardens on the National Mall, a National Register Concurrence Determination in 2008, as a **rehabilitation project** effort described in the 2010 general management and visioning National Mall Plan. In addition a design team has already been selected via a national design competition in 2012 providing design concepts. **The “SCOPING” needs to include alternative landscaped design concepts, for this part of the National Mall, based on the original historic 1901 McMillan Plan and/or any subsequent official modifications, in addition to the usual no action alternative.**
- The EA needs to describe directly how each of the alternatives will “improve the ecology”.
- Project boundaries need to be delineated. The notice states “This **52 acre park** was officially dedicated in 1976” **designed as a pastoral landscape**. The NPS 2008 “Cultural Landscape Inventory” for Constitution Gardens, page 2, describes the gardens as “The **43.1-acre park** occupies a prominent position in West Potomac Park, northeast of the Lincoln Memorial Grounds”. **(Emphasis added)** Is it part of US Reservation 332 or smaller?
- All alternatives must be examined in relation to the rest of West Potomac Park and the portion of the Park and Lake known as “The Signers of the Declaration of Independence” Memorial.
- The history of the site needs to go back before the 1966 SOM Plan and should be reflected in the alternatives studied. **McMillan Plan concepts (established a design framework for the area and deserve to be considered and included).**
- All previous 1974 EA recommendations should be considered and evaluated. “
- Any alternative studied needs to assess existing and long range flood issues. The lake should be part of the comprehensive flood program in the works by Federal and District Agencies. Only restoring the lake is too limited. What is its potential in holding flood waters that inundate this low part of the National Capital?
- How does the lake relate to other flood measures such as the 17th Street levee and the Potomac River flooding?
- Public Scoping Notice mentions “Poor soil conditions have kept some of the trees from reaching full maturity to this day”. The EA needs to examine and study this situation and recommend solutions. (We understand that there was never enough money in the 1970’s to adequately remove all polluted soil and /or foundations with good soil). Will this “Rehabilitation” effort include adequate funds for this basic park setting need?
- The Public Notice also mentions “many of the walkways have deteriorated and the visitor services facility once imagined...was never realized”. The EA needs to assess changed conditions to avoid this happening again, in all equally treated, alternatives.

Submitted by George H. F. Oberlander, AICP, on behalf of National Coalition to Save Our Mall

301-816-1153