

## NATIONAL COALITION TO SAVE OUR MALL ADDITIONAL COMMENTS FOR SCOPING

### PROPOSED REHABILITATION OF CONSTITUTION GARDENS

June 2, 2014

The following are additional comments from the National Coalition To Save Our Mall (NCSOM) supplementing our May 22, 2014 statement presented at the Scoping meeting for the Constitution Gardens Rehabilitation Environmental Assessment and Section 106 process:

- The two suggested alternatives to be assessed for environmental and historic impacts, in addition to the “no change alternative” are only “slightly different remediation options” not actual alternative plans. **Assessing these minor differences options gives the impression that the Trust’s competition single winning design is the preferred or desired alternative.** There need to be several different feasible alternative plans recognizing this very historic area **not just remediation proposals.** Each plan is required to be equally assessed. **The “Sustainable Alternative” and the “Social Alternative” are too close to adequately assess the different environmental historic impacts of the proposed man made environment and garden rehabilitation.**
- Moving the Lockkeeper’s House a few feet west and/or assessing the two levels proposed Pavilion **in the same location close** to the WW II Memorial, is inadequate.
- Comments were made that the “ultimate solution will probably be a hybrid of the two plans”. **This again indicates pre judgment in favor of the design selected.**
- The Scoping presentation did not indicate who will prepare the EA? Since the Trust has already identified the competition winning design, we suggest the EA be prepared for the NPS by an independent contractor. Consideration should be given to up-date and/or revise the 1974 EA. **Examine why certain recommendations in that document did not get implemented?**
- The winning design concept characterizes Constitution Gardens as a “Destination”. We consider **the “destination” to be the entire extent of the National Mall.** Constitution Gardens should be evaluated as an integral part of the historic 1901 McMillan (Park) Plan. Designating the Gardens as a direct destination would imply and require more automobile and bus parking needs than can be accommodated on Constitution Avenue.
- The real alternatives should include a number of the winning design’s rehabilitation ideas, such as the land berms and lake rehabilitation concepts, soil improvements, tree intensification and seating areas. Any two level pavilion structure(s), larger than a Kiosk, needs to be buried and /or incorporated into the landscape and greened to the maximum. **Keep it low key** as proposed by the original SOM approved design.
- Solutions to the “poor soil” conditions should be given greater consideration and funding priority with tree planting to the maximum.
- Examine feasibility of **an open sky refreshment facility,** as a “garden design solution” with limited enclosed service and toilet space. Designing the park to be a “Multi-Purpose Facility” needs to be limited to actual determined people needs in a “pastoral landscape”. Is there a real need for an additional ice skating rink and its support?

- Include a design study of the historic “cross axial” alternative proposed earlier in relation to the existing Reflecting Pool. Should the lake be reduced in size with possible cross walk pedestrian circulation improvements?
- A night lighting assessment should be included to relate possible lighting impacts of proposed structure(s) to viewing distractions **on each adjacent Memorial**, including viewing the Washington Monument from Constitution Avenue.
- NCSOM requests consulting party status for the Section 106 process.

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