

# National Coalition to Save Our Mall

*Preserving Our Monument to Democracy*



Judy Scott Feldman, Ph D, Chair  
301-340-3938  
www.savethemall.org  
PLEASE REPLY TO:  
National Coalition to Save Our Mall  
9507 Overlea Drive  
Rockville, MD 20850

Comments on Site Selection Environmental Assessment  
Dated June 2006  
For proposed  
Dwight D. Eisenhower Memorial

The National Coalition to Save Our Mall (Coalition) offers the following comments, to the Dwight D. Eisenhower Memorial Commission and the National Park Service, on the June 2006 Proposed Dwight D. Eisenhower Site Selection Environmental Assessment (EA):

- As stated in the title of the document and in the purpose and need for the proposed action, the EA **only deals** with the preferred site for the Memorial at Maryland and Independence Avenues SW Washington DC, and a no-action alternative.
- The environmental impact of the to be designed memorial will have to be assessed later and incorporated in the EA.
- The Coalition feels this bi-fabricated approach falls short of the Environmental Protection Act (42 U.S.C. 4321 et seq., Section 1508.9) intent to assess all potential impacts as a combined unit to assist decision makers in providing information about the positive and negative environmental effects of the proposed undertaking and its alternatives. **This means more than site selection only.**
- The EA document favors the preferred site for stated reasons not environmental considerations.
- Even though the examination of 26 sites are mentioned in the EA, with 9 sites recommended for further study, only the preferred site and the no-action alternative are analyzed.
- EA`s are to describe, in equal detail, the environmental impact of a range of reasonable alternatives that meet the objectives laid out in the purpose section and that reduce or eliminate impacts to important environmental resources.
- The Coalition believes there are other reasonable alternatives among the 9 sites suggested for further environmental analysis and study.
- Reading the EA one gets the immediate impression that the preferred site has been pre-determined and only this site can meet stated objectives. The EA then justifies the preferred site.

- Asking the National Capital Memorial Advisory Commission to approve the preferred site before the EA is complete, is also an indication of pre-determination.
- Section 1.7, Cumulative Relationship of Nearby Projects, lists 14 ongoing or planned projects in the vicinity of the preferred site which could result in cumulative construction and operational impacts when considered together with the effects of the proposed action. Listing is only partially useful. No actual cumulative environmental analysis is undertaken. Particularly the cumulative traffic increase from the various building projects is not examined.
- In the immediate site area to the west, the proposed Maryland Avenue corridor revitalization has the potential of adding 6-7 million sq. ft of office, residential, and museum uses. This major development potential is not taken into account by the EA.
- Another major issue, the proposed closing of Maryland Avenue to thru traffic, in order to create a larger memorial site, is inadequately analyzed for impacts on this historic environmental view corridor resource. Maintaining only the 60` cartway free from new structures “...the Avenue offers limited development opportunities within the cart way” ( EA page 2-15) is historically incorrect. The Avenue originally established 160 foot street right-of-way (R.O.W.), similar to Pennsylvania Avenue north of the National Mall, has always been intended to be free of any structures other than view framing tall street trees. Routing east-west traffic into 6<sup>th</sup> Street will reduce the level of traffic service at 6<sup>th</sup> and Independence Ave. (As indicated on EA page 3-23 and 4-14). With the future potential traffic increase from the Maryland Avenue revitalization, more attention is needed to the proposed traffic movement alteration.
- The Coalition believes Maryland Avenue and Independence Avenue can be restored to its originally intended intersection configuration just as Pennsylvania and Constitution Avenues have been as part of the Pennsylvania Avenue Development Corporation Plan.
- The Visual Resources analysis is in adequate. The EA states that the memorial has not yet been designed. However “some of the parameters developed to guide the design...address the visual relationship that the memorial should have with the adjacent area”. Two of these parameters deal with “maintain the direct vista to the Capitol along Maryland Avenue” and “strengthen the view corridor and create a welcoming entrance along Independence Avenue”. These parameters are too general and no clear view corridor width dimensions are provided.
- The EA`s page 4-9 states “The enhancement of the preferred site with a memorial, a landscaped plaza and possibly **two small visitor services structures** has the potential to improve the **four** view corridors that would be affected by the memorial”. This is speculative. No evidence is provided to support this statement. Allowing even small structures within the R.O.W. is inconsistent with the two stated parameters.
- The EA also states (page 4-9), “The location of the visitor service buildings is currently unknown, however, they would be located outside the Maryland Avenue view corridor so that they do not interfere with the vista, especially when viewed from a distance”. **Such generalizations need more specific guidance** and

**direction** in order to conclude “Overall, if the memorial design is consistent with the established parameters, there would be no adverse impact on Maryland Avenue.” **The design of the memorial is part of the impact on the environment.**

The Coalition supports the proposal for a Dwight D. Eisenhower Memorial near the National Mall. However we believe that the EA is inadequate in its present form.

**The EA needs more objective analysis which can help the decision makers conclude, from the reasonable alternatives examined, which site has the least adverse environmental impacts.**

Comments submitted July 17<sup>th</sup>, 2006 on the NPS *Planning, Environment & Public Comment (PEPC) website: <http://parkplanning.nps.gov/nama>.*