



United States Department of the Interior

NATIONAL PARK SERVICE

National Mall & Memorial Parks
900 Ohio Drive, S.W.
Washington, D.C. 20024-2000



D66 (NCR-NAMA)

JUN 2 2010

Mr. Reid Nelson
Director
Office of Federal Agency Programs
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, N.W., Suite 803
Washington, D.C. 20004

Dear Mr. Nelson:

The National Park Service (NPS) has initiated consultation with the District of Columbia Historic Preservation Office (DC SHPO) under Section 106 of the National Historic Preservation Act on the National Mall Turf and Soil Reconstruction, an undertaking, in accordance with 36 CFR 800.3 of the regulations of the Advisory Council on Historic Preservation (ACHP).

The Mall is a historic landscape that occupies some of the oldest parkland in the National Park System and hosts some of the most prominent buildings, museums, and monuments in the country. As one of the most popular national tourist destinations, the Mall is one of the most used public areas in the District of Columbia for national celebrations, first amendment demonstrations, special events, and recreation with an annual visitorship of nearly 25 million.

However, due to intense use, the turf panels on the Mall have deteriorated. Action is needed to address the management of this civic space to alleviate the intense soil compaction and enable proper air, water and nutrient infiltration. Reducing soil compaction will also improve site drainage, stormwater management, and the condition of turf. To support the new turf system, the current irrigation system needs to be replaced because it has been compromised by the intense use and does not adequately service the project area.

The Area of Potential Effect (APE) that has been proposed is more inclusive than the turf panels, and corresponds to the Mall defined as open space surrounded and defined by adjacent buildings and the associated views and vistas. The APE consists of the Mall, including the Contributing Reservations 3B, 3, 4, 5, 6, and 6A. The boundaries have been drawn at the line of 16th St. N.W. across the Washington Monument grounds on the west, the western terrace of the U.S. Capitol on the east, Independence Ave. S.W. and Maryland Ave. S.W. plus the line of its continuation northeast toward the Capitol on the south, and Constitution Ave. N.W. and Pennsylvania Ave. N.W. plus the line of its continuation to the southeast toward the Capitol on the north. The enclosed attachment shows the APE.

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Given the potential scope of the Mall Turf project and the ground disturbing activities associated with it, the NPS has determined the need to conduct a phase 1a archeological review, and if necessary, phase 1b archeological testing. The NPS also plans to propose a phased approach for the implementation and construction of this project. We anticipate that phase 1 construction will entail the installation of below grade infrastructure, such as cisterns, water lines, and an pump station along with visible above ground work focused on the installation of curbs and soil and turf in the three most eastern lawn panels in the center of the Mall.

We have enclosed a draft Mall mapping study prepared by Heritage Landscapes, LLC for your consideration and review. This study expands upon the narrative description of the changes in the Mall landscape over time that can be found in the recently completed Cultural Landscape Inventory of the area.

The NPS has also begun an Environmental Assessment (EA) to analyze impacts specific to the Mall Turf project. The NPS intends to coordinate Section 106 process with the National Environmental Policy Act per the ACHP's regulations (36 CFR 800.8).(NEPA). The first meeting open to the public was a public scoping/Section 106 meeting held at the National Capital Region headquarters building on March 9, 2010. The NPS intends to continue consulting with the public per 800.3(e) in public meetings and through our Planning, Environment, and Public Comment (PEPC) website – www.parkplanning/nps.gov. It is anticipated that these outreach efforts will accommodate both NEPA and the 106 process. We will continue to post presentation materials to PEPC that can assist the public and consulting parties in their review of the project.

At this stage in the design process, the NPS is not prepared to make a formal determination of effect for the National Mall Turf and Soil Reconstruction, but looks forward to consultation with the DC SHPO on this and other steps in the process.

Because of the sensitive nature of the project site, and the potential for adverse effects, we are happy to invite the active participation of ACHP in the Section 106 process. Please indicate whether you wish to do so or have any other questions about the undertaking by contacting me or Mark Isaksen, Chief, Resource Management, National Mall and Memorial Parks at (202) 245-4711.

Sincerely,



John Piltzecker
Superintendent
National Mall and Memorial Parks

Enclosure

cc: Mr. Reid Nelson, Advisory Council on Historic Preservation
Ms. Nancy Witherell, National Capital Planning Commission