



President's Park South Project
Environmental Assessment & Section 106

ENVIRONMENTAL ASSESSMENT SCOPING REPORT

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1.0 INTRODUCTION

The National Park Service and the United States Secret Service are undertaking a planning project under the National Environmental Policy Act (NEPA) and are developing an Environmental Assessment on elements in the areas of President's Park South, which includes a portion of E Street N.W. in Washington, D.C.

Through the Environmental Assessment process, the United States Secret Service and the National Park Service will be making key decisions.

The United States Secret Service (USSS) will be deciding:

Whether to permanently close, the following areas that are presently closed on a temporary basis:

- 1) The section of E Street between 15th and 17th Streets, N.W., South Executive Avenue and the Ellipse roadways to unauthorized vehicular traffic;
- 2) State Place and West South Executive Avenue and adjacent sidewalks (contiguous to First Division Monument) and Hamilton Place and East South Executive Avenue and adjacent sidewalks (contiguous to Sherman Park) to unauthorized vehicular and pedestrian traffic;

On designs for durable, more aesthetic security elements to replace the current temporary, unsightly elements in the President's Park South area.

The National Park Service (NPS) will be deciding:

Whether the landscape and infrastructure changes that are proposed in response to the street closures and re-design of the security elements will preserve the iconic historic cultural landscape that is the White House and President's Park South, an important destination for visitors.

The purpose of these decisions by the USSS and the NPS is to provide the security needed for the White House by providing permanent, more aesthetically pleasing security elements while preserving the historic cultural landscape in President's Park South.

The proposed actions grow out of needs identified by USSS concerning the level and type of security required for the White House. Road closures and related security elements in President's Park South, considered temporary since 2001, need to be evaluated to determine whether they will remain for the foreseeable future. These temporary security elements are inconsistent with the *Comprehensive Design Plan for the White House and President's Park* (2000) and the *Design Guidelines for the White House and President's Park* (1997). Permanent, aesthetic improvements compatible with these guiding principles are needed to preserve the visual character and integrity of the White House and its environs while continuing to meet security requirements.

To help develop alternatives for the EA, the National Capital Planning Commission (NCPC) will hold a design competition, the results of which will be used in preparation of the alternatives for the EA.

1.1 Scoping Process

According to the Council on Environmental Quality (CEQ) regulations implementing NEPA, the purpose of the scoping process is to determine the scope of the EA so that preparation of the document can be effectively managed. For this project, scoping helped to solicit input and concern from agencies and the public regarding the proposed project and its purpose and need.

To initiate scoping, a Federal Register notice was released on March 8, 2011 and posted on the NPS Planning, Environment, and Public Comment (PEPC) website: <http://parkplanning.nps.gov/PRPA>. The public scoping notice provided background information on the project and detailed directions for getting to the meeting. Public scoping began on March 8, 2011, and ended on April 22, 2011.

Letters explaining the project and announcing the public scoping period and meeting were sent by the NPS to: (1) potential Section 106 consulting parties, organizations, and agencies; (2) neighboring organizations and agencies around the study area; (3) organizations that are affiliated with memorials in the study area; and (4) organizations representing users of the study area. A news release on the project and public scoping was issued by the NPS, USSS and NCPC.

A public scoping meeting was held between 5:30 pm and 8:30 pm on Thursday, March 31, 2011, at the White House Visitor Center on 1450 Pennsylvania Avenue, N.W., located near 15th and E Streets, N.W., in Washington, D.C.

Attendees included individuals, organizations, and government representatives interested in learning more about the project; providing comments about the purpose and need, proposed actions, and existing conditions; and, expressing issues and concerns. The meeting included a project overview presentation by the NPS, USSS and NCPC. Attendees then had the opportunity to read about the project on information banners and to discuss questions and concerns with representatives of the NPS, USSS, and NCPC. Meeting attendees were provided the opportunity to submit comments via a standard form or online via the President's Park South Project website (<http://parkplanning.nps.gov/PRPA>). The public comment period remained open until April 22, 2011, which amounted to 45 days following the Federal Register notice and an additional 22 days from the date of the public meeting.

The comments provided at these meetings and received via the project website or through the postal service are summarized on the following pages and organized according to topics that could be addressed in the EA.

2.0 COMMENT SUMMARY

At the end of the public comment period on April 22, 2011, 15 comments, including responses to consultation and coordination letters, were submitted via e-mail, U.S. Postal Service, in person, or on the park's PEPC website. Of these comments, 12 were submitted in response to the public scoping (6 from unaffiliated individuals and 6 from businesses, agencies, or organizations) and 3 were submitted in response to initial consultation and coordination letters sent by the NPS (all 3 were from agencies). Comments were received from the D.C. Office of Planning, the Federal City Council, the D.C. Department of Transportation (DDOT), the Downtown Business Improvement District, the Committee of 100 on the Federal City, the Washington Area Bicyclist Association, the D.C. Historic Preservation Office (D.C.SHPO), the US Court of Appeals for the Federal Circuit, the US Environmental Protection Agency Region III (EPA), and a number of unaffiliated individuals.

Scoping comments are summarized below, including representative comments. Agency responses will be considered in developing the EA.

2.1 Comments on Purpose and Need for the Project

Several commenters expressed that the scope of the project area should be broadened to include the grounds of the White House and President's Park in its entirety. In addition, comments suggested that the project should consider, in depth, its connectivity to the east-west axis of the National Mall and to other green spaces within Washington D.C.

The addition of the proposed security and other improvements greatly impact the open and green character of the city's park system and will need to be sensitive to larger park and open space planning goals. The incorporation of sustainable practices into the project can be a model for other federal, local, and private sector development projects.

The scope of the EA needs to include the grounds of the White House and Present's Park in their entirety, including the Ellipse. The closing of Pennsylvania Avenue north of the White House and the temporary closing of E Street in 2001 significantly impacted cross-town traffic flow in downtown Washington, D.C. Including all of President's Park South will ensure that the widest range of options for allowing E Street to remain open are considered, either in its current location or one with a different alignment that addresses security and design concerns.

President's Park South is, in fact, a key part of the great north-south axis that extends from the White House south across the Washington Monument Grounds and on to the Jefferson Memorial. We understand the National Park Service's reasons for making President's Park a separate jurisdictional area. However, as the President's Park South Project moves forward, we hope the plans for President's Park, and the relationships to the National Mall, can be made clearer.

D.C.SHPO suggested that the U.S. Department of Agriculture Administration Building and South Building also be included in the Area of Potential Affect (APE).

EPA suggested that the project area should be described in detail and quantified in the EA, specifying the type and acreage of land impacts and description of existing buildings on site.

EPA also suggested that First Division Monument, Hamilton Place, and Sherman Park be identified on the map. It also suggested any necessary permits for the proposed actions be identified.

2.2 Comments on Consultation for the Project

D.C.SHPO suggested that the Organization of American States, the Daughters of the American Revolution, the American Red Cross, the Corcoran Gallery of Art, American Institute of Architects, the American Society of Landscape Architects, the National Coalition to Save Our Mall, and the agencies/organizations that occupy the buildings across the street from the Old Executive Office Building be notified and invited to participate in Section 106 as consulting parties.

EPA provided a list of topics that should be addressed in the EA, including the purpose and need, alternatives analysis, project description, and multiple impact topic areas.

DDOT would like to be a Participating Agency in the NEPA process. As a Participating Agency, they would like the opportunity to review and provide input into the range of alternatives considered and

their impacts; participate in meetings initiated by NPS; and review and comment on the draft EA.

2.3 Comments on Resource Areas for the Project

2.3.1 Public Safety

Several commenters expressed concern for visitor and commuter safety in the area.

Currently, the area is a trouble-spot for cyclists -- as it both presents a barrier to street connectivity and creates an unsafe circumstance in existing bicycle facilities at the intersection of 15th Street and Pennsylvania Ave.

Additionally, Washington Area Bicyclist Association (WABA) asks that NPS focus clearly on alleviating the dangerous condition along the 15th street cycle track, in which motor vehicles awaiting entry to the White House area block the cycle track as a matter of policy, forcing cyclists to divert into traffic. This spillover of vehicles from the security screening area should be examined. And whether through physical or programmatic changes, a solution that does not allow the parking of vehicles in the bicycle travel lanes must be found.

2.3.2 Visitor Use and Experience

Commenters expressed concerns about limiting visitor use or access in the area:

The impact of changes proposed to President's Park South also need to be evaluated and understood within the context of the District's park and open space system. Provisions included in the "Memorandum of Agreement Between the District of Columbia Recreation Board and The National Park Service" (signed and dated August 26, 1949) identifies Reservation 1 - President's Park (Grounds, south) - as a reservation within the District's park system to be made available for carrying out a program of public recreation. Any changes to this park area, with the potential to impact the use of this space for active recreation, needs to be evaluated within the context of this MOA. The Capital Space plan, approved by the National Capital Planning Commission in April 2010, also focuses in part on parks and open spaces in the District and emphasizes the importance of promoting active recreation and enhancing Center City parks. Specific sections of the Capital Space plan that should be reviewed as part of this EA include those related to improving playfields to meet the needs of residents, workers and visitors, and those related to enhancing Center City parks and open space to support a vibrant downtown.

In reference to closing the sidewalks contiguous to the Sherman and First Division monuments to pedestrians, we believe visitors should be able to go to each monument in order to read the names of Sherman's battles and those killed in World Wars I and II.

We feel the overall plan needs to better address how visitors view the White House from the south side. We are concerned that access to the south fence (on E Street) not be blocked and that sufficient sidewalk space be available so that groups and individual visitors can stand, view and photograph the White House. Visitors should be able to walk around the White House grounds via sidewalk (from E to 17th to Pa. Ave. to 15th to E).

As mentioned in the E Street section, the access to the ellipse park is a challenge for local residents and visitors due to the increase security presence at each of the access points. At this point in time, it is not clear who can and cannot access the park, under what circumstances are

pedestrians and cyclists allowed, and at what times of the days is access granted. DDOT understands that security concerns are valid during exceptional times but the visitors experience to the monumental core is severely constrained due to the lack of information and intimidating security presence.

In this respect, we are concerned with the language of the handouts that indicated consideration of "whether to permanently close" certain areas that are now temporarily closed. In fact, it should be possible to redesign this area to greatly improve its appearance and ease of pedestrian circulation without undertaking a permanent closure of certain areas.

Many commenters expressed the importance of visitor amenities and making the area aesthetically pleasing to visitors.

The closure of E Street between 15th and 17th Streets, and closure of related areas, with the addition of a variety of ad-hoc security barriers has created a visual "mess" and decreased the experience of visiting and passing thru this important area for both visitors and local residents.

We are concerned that the temporary security measures, such as a snow fence, which have been erected periodically, present an unsightly and distracting appearance for the Second Division Memorial. We are in favor of those being removed.

The Downtown Business Improvement District (BID) encourages the National Park Service to include in the scope of their decision-making a comprehensive visitor information program regardless of the USSS decision on street closure. Such an information program should include visitor orientation to the existing local transportation network surrounding the area and local destinations within walking distance from the area.

Improving the appearance of the area, and improving the access paths for the circulation needs of visitors and local residents is especially important.

Third, add fountains, pools, trees, gardens and benches in the Park area for use by visitors and tourists.

Commenters expressed interest in increasing bicyclist opportunities in the area, as well as considering the needs of bicyclists when deciding upon paving and other design materials.

DDOT has implemented a cycle track along 15th Street that starts at Euclid Street (on the northern end) and ends at the intersection of 15th and E Streets, N.W. DDOT had to modify the original design of extending the cycle track all the way to Constitution Avenue due to the vendor trucks and tourist buses that currently park along the last block of 15th Street before it reaches Constitution Avenue. DDOT would like to work with the NPS and USSS to extend the cycle track to Constitution Avenue. This will provide uninterrupted access to commuters trying to link to several of the bridges carrying bicycle commuters across to Virginia and to visitors cycling around the National Mall.

Short of a re-opening of this street segment, the Downtown BID encourages the USSS to allow safe and convenient bicycle and pedestrian access, similar to the conditions in place on Pennsylvania Avenue between 15th and 17th Streets, N.W.

While clearly it is important that the White House be secure, WABA believes that banning bicycle traffic on a major cross-street is unnecessary, and asks NPS to make all of President's

Park South accessible for bicycle travel. If NPS selects for consideration alternatives that would limit access to the area by bicyclists, WABA asks that clear, evidenced-based rationale be provided of the threat posed by bicyclists and bicycle travel through the area.

We truly hope that NPS and the White House will reach a result that recognizes the importance of President's Park as the intersection of three major bicycling facilities - the Pennsylvania Avenue bike lanes, the 15th Street cycle track, and the E Street bicycle lane - and endeavors to encourage bicycle connectivity to the maximum extent possible. Any deviation from this goal should be fully explained and documented as the process continues.

Aside from this overarching issue of accessibility we ask that NPS and the USSS consider: use of materials that allow for safe and comfortable bicycle travel (e.g. avoiding deep cobbles, vertical grates, overly-narrow bollards, etc.); provision of bicycle parking for users of private bicycles and Capital Bikeshare bikes; opportunities for separation of various modes to minimize conflicts between them; and methods of ensuring adjacent bicycle facilities, especially the 15th Street cycle track and bike signal for Pennsylvania Avenue lanes, are safely accessible by cyclists.

As you develop President's Park South to encourage bicycling for both commuting and recreation, please make sure to mark lanes and areas clearly so that the many tourists that visit the area can navigate, either on bike or foot, through the area without colliding with bicyclists.

2.3.3 Cultural Resources

One commenter suggested that a study of the historic evolution of President's Park needs to be completed.

There appears to be a need and an opportunity for additional interpretation of the historical evolution of President's Park, and of adjacent areas. Such work may be beyond the scope of the present project, but the need should be noted.

2.3.4 Air Quality

One commenter expressed concern about the impacts of increased vehicle idling on air pollution as a result of the E Street closure.

Increased idling will directly increase fuel consumption as well as the emissions of various air pollutants, particulates, NOX, VOC, carbon monoxide that pose public health threats in the downtown area and, in the case of carbon dioxide, contribute to global warming. This is a particularly important issue given that the District of Columbia is currently classified by the U.S. Environmental Protection Agency as being in "non-attainment" status for the national ambient air quality standards. Moreover, the growing congestion problem will continue to negatively impact the economic vitality and potential of the downtown area.

2.3.5 Transportation and Traffic

Commenters expressed concerns about the current and potential future traffic impacts of the E Street closure on Washington D.C. traffic patterns.

We have monitored the proposed changes to E Street because we know that its temporary closure, along with the permanent closure of Pennsylvania Avenue in front of the White House,

has contributed to increased traffic congestion throughout downtown, which has negatively affected air quality and the area's economic potential.

When the NPS completed its Comprehensive Design Plan and Final Environmental Impact Statement for the White House and President's Park in 2000, it recognized that downtown traffic congestion was a major problem that would only be exacerbated by the permanent closure of E Street. In fact, the proposed plan rejected closure in favor of retaining E Street as a two-lane eastbound street through the White House precinct. Rejection of permanent closure was the correct decision then and remains correct, given the adverse impact it would have on traffic and the environment throughout downtown. NPS, at the time, estimated that a closed E Street would displace approximately 12,000 eastbound vehicles per day.

Closure of E Street, combined with the prior decision to permanently close Pennsylvania Avenue, is expected to affect as many as 75,000 people per day by the year 2020. As a result, adjacent streets, including H, I, K, L Streets and Constitution Avenue will continue to receive a substantial part of the traffic overflow. The remainder of the traffic is expected to be diverted around these corridors and dispersed through other outlying neighborhoods. This overflow is expected to cause significant traffic delays throughout downtown, especially during peak hours as the number of signal failures increase and periods of congestion extend two to three hours longer than usual.

The resulting delays affect not only automobile riders but transit passengers as well. We know from the E Street temporary closure that bus transit has been significantly affected with certain cross-town routes taking up to 1.5 times as long as they took prior to closure. Given the federal and District government's goal of promoting and improving public transit in the downtown area, it is clear that the permanent closure of E Street will have a detrimental effect on this effort in a significant and negative way.

There is currently a steady high volume of cross-town traffic in the areas immediately north and south of the President's Park (I Street and Constitution Avenue), in large part due to the previous closings of Pennsylvania Avenue as well as E Street.

2.4 Comments on Proposed Actions for the Project

Several comments expressed either support or concern for the proposed actions and some presented more specific ideas for the alternatives. These ideas are presented by subcategory.

2.4.1 Sustainable Practices

Commenters suggested that sustainability should be a goal for the project and that all sustainable design practices should be used including the use of Low Impact Development (LID) strategies:

The District strongly encourages your proposal to integrate sustainable practices into its design. President's Park South is located within the city's Combined Sewer Overflow system area. During periods of significant rain fall when the system's capacity is exceeded, untreated storm water from this site flows directly into the Potomac River. Any Low Impact Development (LID) strategies incorporated into this project will have a direct impact on minimizing the amount of excess storm water entering into the sewer system during these times. While not yet standard practice, we are seeing an increase in the use of LID techniques incorporated in park design and being implemented in public space. Throughout the design of this project, my staff can be an excellent resource to share information with you on the latest techniques and

technologies reviewed and approved as part of other current projects, and the processes for obtaining the required permits.

2.4.2 Planning Alternatives

Commenters noted that any infrastructure alternatives should be paired with improved transportation planning for the area.

An infrastructure solution should be paired with a broader strategy to improve traffic management and operations in the affected downtown area.

- *Improved transit options in the downtown area through expanded bus service and/or a dedicated transit way for buses and/or streetcars along K Street where east-west transit routes could be consolidated*
- *Identification and utilization of "commuter routes" around the downtown area to which east-west traffic would be funneled during peak rush hours and traffic signals coordinated to facilitate traffic through these entry and exit corridors*
- *Reconstruction of major intersections to improve traffic flow through the downtown grid and accommodating both automobiles and bus/streetcar needs*
- *Balanced signal progression throughout the downtown grid*

One commenter noted that all Executive office parking spots should be eliminated from the project area.

2.4.3 Infrastructure Alternatives

Several commenters suggested that the NPS and USSS consider tunnel alternatives that could meet USSS security standards, but enable smoother traffic flow.

Among the alternatives considered at the time was one that would have tunneled E Street as a four-lane two-way street between 15th and 17th Streets. This option was rejected because it was deemed insufficient to improve the level of service experienced along I Street, another major westbound street. Given the current traffic congestion that occurs along H, I, K, and L Streets due to diverted traffic around the White House, we believe it would be prudent to reconsider and update the tunneling options.

Infrastructure alternatives and public/private options for financing them should be given strong consideration. The White House Area Transportation Study looks at several tunnel options for E Street, ranging from a short park deck that would extend over a lowered E Street within the White House precinct to a much longer tunnel that would extend from Pennsylvania Avenue on the east to 20th Street on the west. We believe the various tunnel options should be re-examined as a partial solution to mitigating the adverse effects of increased downtown congestion, and we would require that each tunnel option be designed to meet USSS concerns about security. Another benefit of the tunnel options is that they would reduce surface traffic within President's Park and create opportunities for pedestrians and bicyclists to gain increased access to the site.

The cost estimates for the tunnel options range from \$85 million for the park deck to \$1.3 billion for the longest tunnel option. Given the current budget environment, we recognize the potential challenges in securing the public funding needed to cover the entire cost of the project. Instead of discarding the infrastructure alternatives on the basis of these estimated costs, we would recommend looking at creative ways to generate private funding to supplement

public investment in an E Street tunnel project.

Would not the East-West cross-town traffic problem be resolved by incorporating into the design the extension of the E Street tunnel to 15th St., with allowances for exit at the 20th-19th-18th-17th Sts. area, OR by creating a second tunnel (underground roadway) that runs from 17th to 15th St.?

Several commenters noted that re-opening E Street should be maintained as an alternative. Some of these commenters also suggested that widening E Street should be considered.

The environmental assessment should also explore the option of keeping E Street open but physically relocating the street further south within the President's Park to meet USSS security concerns. Given the high costs associated with the tunnel options, NPS should consider the simpler alternative of moving E Street southward. This would require the scope of the environmental assessment to include a broader area (ideally, the entirety) of the White House and President's Park. This would allow for full examination of alternatives to mitigate traffic congestion and air quality concerns. It would also be consistent with the need to ensure that the park's design reflects the current needs and challenges in the surrounding downtown area.

The possibility of widening E Street from two to four lanes to accommodate a higher volume of traffic should be considered. Whether E Street should return to being solely eastbound throughout the day, reversible so that it runs east in the morning and west in the afternoon, or to a two-way street at all times should be determined based on the alternative that best reduces east-west congestion in the broader downtown core. As part of the environmental assessment process, we encourage a thorough examination of the impact of widening E Street.

The Downtown Business Improvement District (BID) supports the re-opening of E Street from 17th- 15th Streets, N.W. that is presently closed on a temporary basis by the United States Secret Service (USSS). The importance of this east-west travel corridor to circulation in the center city has been thoroughly documented in the White House Area Transportation Study.

I think E Street should be reopened. It's as far from the White House as K and certainly E can be opened safely. If not perhaps it could be opened for buses, bikes, & pedestrians only. At the minimum it should get a similar treatment as Pennsylvania Ave. The other roads (Hamilton, State, the Ellipse & the roads those feed into) should be repurposed. Perhaps, the Ellipse could become an area for roller skating. Other streets could be turned into walking parks - like a ground level High Line trail. Move the visitor center & enlarge it to serve as the White House Visitor Center.

2.5 Comments on Other Aspects of the Project

One commenter stated that there was not enough information in the documents presented at the public meeting, which were also made available online.

One commenter requested that vending vehicles be removed from 15th Street, N.W.

Regarding tour bus access to the White House south side, it would be helpful if those vending vehicles be removed from 15th Street (between 15th Street and Constitution Avenue). Vending vehicles currently occupy much-needed space for tour bus pick-up and drop-off of visitors to the White House.

One commenter suggested that D.C. Code and the District's Comprehensive Plan be included in the relevant policies and plans during the NEPA process.

As part of evaluating the realignment or closure of streets and sidewalks associated with this project, the administrative procedures of the District should be identified and followed. Specifically, the EA should review chapters in D.C. Code, Title 9: Transportation Systems that identify procedures for making changes to the street system (Section 202.01 to 202.15). Also, the District's Comprehensive Plan includes policies and actions that relate to vehicular, pedestrian, and bicycle systems that also need to be taken into consideration. An entire section of the Comprehensive Plan is dedicated to transportation.

2.6 Next Steps for the Project

All comments gathered during the public scoping period will be considered and utilized in development of the EA and its alternatives. Comments will also be shared with the finalists in the NCPC design competition being held to help develop alternatives for the area. When the design competition is complete, alternatives will be developed using the results of public scoping, the competition designs, and the alternatives considered for the *Comprehensive Design Plan for the White House and President's Park*.