

**Rehabilitate Tidal Basin and West Potomac Park
Seawalls Environmental Assessment
Scoping Summary Report**



National Mall and Memorial Parks (NAMA)

PMIS No. NAMA 318722

September 26, 2022

Table of Contents

INTRODUCTION	1
SCOPING PROCESS.....	1
SCOPING PERIOD.....	1
PUBLIC NOTIFICATIONS.....	2
VIRTUAL SCOPING MEETING.....	2
VIRTUAL SECTION 106 CONSULTING PARTIES MEETING	2
PEPC WEBSITE	2
ANALYSIS METHODOLOGY.....	3
COMMENT ANALYSIS.....	3
CORRESPONDENCE DISTRIBUTION	4
COMMENTS BY TOPIC	6
APPENDIX A. SCOPING CORRESPONDENCE.....	10
Table 1. Definitions of Terms.....	3
Table 2. Correspondence by Organization Type.....	4
Table 3. Correspondence Distribution by State	4
Table 4. Correspondence Distribution by Topic.....	5

INTRODUCTION

The National Park Service (NPS) is preparing an Environmental Assessment (EA) for the proposed rehabilitation of portions of the Tidal Basin seawall and the entire West Potomac Park seawall in accordance with the National Environmental Policy Act (NEPA) of 1969 as amended. The EA will evaluate approximately 6,800 linear feet of seawall that is administered by the NPS through the National Mall and Memorial Parks (Park) and located in the District of Columbia. The EA will address the project background, the purpose and need for the proposed action, a determination of environmental issues and potential impacts resulting from the alternatives considered (including the no action alternative), and public and agency involvement.

Public involvement and participation is an essential element of the NEPA process, engaging citizens in decision-making through planning and development. Public outreach is also a required action under Section 106 of the National Historic Preservation Act (NHPA). As part of the NEPA process, and to comply with the Section 106 requirements of the NHPA, the NPS involved the public in the project planning by holding a 55-day public scoping period.

This Scoping Summary Report is organized as follows:

Scoping Process – describes the scoping period, public notifications and meetings, the NPS’s Planning, Environment and Public Comment (PEPC) website for the project, and the comment analysis methodology.

Comment Analysis – summarizes the correspondence distribution and scoping comments received and organized by topic,

Appendix A. Scoping Correspondence – is a complete listing of all scoping correspondences.

SCOPING PROCESS

Scoping is an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action. The scoping process should be focused on determining the extent and nature of issues and alternatives that should be considered during a NEPA review. The scoping process includes both internal and external (other agencies, Tribes, non-governmental organizations, and the public) elements and should continue throughout the planning and early stages of preparation of an EA.

SCOPING PERIOD

The 55-day scoping period for the Rehabilitate Tidal Basin and West Potomac Park Seawalls EA began on July 19, 2022 and concluded on September 12, 2022. A virtual public scoping meeting was held on July 19, 2022. To receive consideration, the NPS required that scoping comments must be submitted online or postmarked by September 12, 2022. Online comments were submitted through the project’s PEPC website. Written comments were mailed to:

Jeffrey P. Reinbold, Superintendent

Attn: Rehabilitate Tidal Basin and West Potomac Park Seawalls EA

National Park Service, National Mall and Memorial Parks

900 Ohio Dr. SW

Washington, DC 20024

PUBLIC NOTIFICATIONS

The NPS communicated project information with the public, agencies, and other relevant stakeholders during scoping by distributing scoping letters and a press release by email. The scoping letter was distributed by the NPS to the interested parties on July 14, 2022. The NPS prepared a press release and sent to local media outlets on July 15, 2022, and uploaded it to NPS press release webpages. Copies of the stakeholder involvement list, scoping letter, and press release are provided in the Communication Plan for the EA.

The scoping letter and press release were composed from the same or similar language. Scoping communications included the project purpose and need, alternatives under consideration for the EA, announcements of the scoping comment period and public meetings, and details regarding how to submit comments.

The notifications cautioned that before including your address, phone number, e-mail address, or other personal identifying information in your public comment, commenters should be aware that the entire comment - including personal identifying information - may be made publicly available at any time. While commenters can ask the NPS in the comment to withhold personal identifying information from public review, the NPS cannot guarantee that they will be able to do so.

VIRTUAL SCOPING MEETING

The NPS held one virtual public scoping meeting that occurred during the scoping period on July 19, 2022, from 6 pm to 8 pm. Virtual media for the meeting described the NEPA and Section 106 processes, purpose and need, history of the seawalls, existing conditions, prior analyses, project requirements, and next steps and how to comment. A question-and-answer session was held at the end of the presentation.

No public comments were accepted during the virtual scoping meeting. Public comments were only accepted via PEPC or letter by email or hard copy mailed to Jeff Reinbold, NAMA Superintendent.

VIRTUAL SECTION 106 CONSULTING PARTIES MEETING

The NPS held one virtual section 106 consulting parties meeting on August 2, 2022, from 10:30 am to 12 pm. Virtual media for the meeting described the proposed undertaking, NEPA and Section 106 processes, identification of historic properties within the Area of Potential Effect (APE), preliminary concepts, and next steps and how to comment. A question-and-answer session was held at the end of the presentation.

No public comments were accepted during the virtual Section 106 consulting parties meeting. Public comments were only accepted via PEPC or letter by email or hard copy mailed to Jeff Reinbold, NAMA Superintendent.

PEPC WEBSITE

The external PEPC homepage for the project, <https://parkplanning.nps.gov/SeawallRehabilitation>, is the primary location to make project documents available for public review and for the public to post comments. The public scoping letter is uploaded for public review on PEPC, along with recordings of the scoping and Section 106 consulting party meetings and copies of the presentations.

ANALYSIS METHODOLOGY

Comment analysis is a process used to compile and combine similar public comments into a format that may be used by decision-makers, including the NPS. Comment analysis assists with clarifying and addressing substantive information pursuant to the NEPA regulations. It also aids in identifying the topics and issues to be evaluated and considered through the planning process. Scoping analysis terminology is defined in Table 1.

Table 1. Definitions of Terms

Term	Definition
Correspondence	Correspondence refers to the entire document received from a commenter. It can be in the form of a letter, email, written comment form, or petition. Each piece of correspondence is assigned a unique identification number in the PEPC system.
Comment	A comment is a portion of the text within a piece of correspondence that addresses a subject. It includes information such as an expression of support or opposition to preliminary alternative concepts or the use of a potential management action, additional data regarding an existing condition, or an opinion on the impact analysis.
Code	An alphanumeric label developed by the comment analyst(s) and used to organize comments by subject.
Non-Substantive Comment	A non-substantive comment is a comment that offers opinions or provides information not directly related to issues or impact analyses. Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with policy, are non-substantive.
PEPC	The NPS's Planning, Environment and Public Comment (PEPC) website provides for public involvement in the planning process.
Substantive Comment	<p>A substantive comment is a comment that does one or more of the following:</p> <ul style="list-style-type: none"> (a) Question, with reasonable basis, the accuracy of information in the document; (b) Question, with reasonable basis, the adequacy of environmental analysis; (c) Present reasonable alternatives other than those presented in the document; and/or (d) Cause changes or revisions in the proposal. <p>In other words, they raise, debase, or question a point of fact or policy. Comments in favor of or against the proposed action or alternatives or comments that only agree or disagree with NPS policy are not considered substantive (non-substantive).</p>

COMMENT ANALYSIS

A total of 42 individual correspondences were received during the public scoping period. The majority expressed positive support. Although 46 correspondences were received, four (4) correspondences were duplicative. Three (3) form letters were submitted by the same individual (numbers 32 through 34), and the correspondence from the Committee of 100 on the Federal City was entered twice (numbers 15 and 41). Two (2) correspondences were manually entered and the remaining were submitted directly in the PEPC system. The correspondences are provided in Appendix A. Correspondence distribution and comments by subject area are summarized below.

CORRESPONDENCE DISTRIBUTION

Table 2 shows that of the 42 individual correspondences, 36 were submitted by unaffiliated individuals, five (5) were received from non-governmental organizations, and one (1) was received from a government organization.

Table 2. Correspondence by Organization Type

Organization Type	Correspondence Number	Total Correspondences
Unaffiliated Individuals	1-14, 16-31, 32, 35-38, 40	36
Non-Governmental Organizations	15 and 41, <i>Committee of 100 on the Federal City</i> 39, <i>National Trust for Historic Preservation</i> 42, <i>FDR Memorial Legacy Committee</i> 44, <i>National Mall Coalition</i> 45, <i>National Parks Conservation Association</i>	5
Governmental	43, <i>DC State Historic Preservation Officer (SHPO)</i>	1
		42

Demographic information is provided in Table 3. Approximately 25% of the correspondences originated in the DC/MD/VA metropolitan area. However, the remaining 75% originated from 21 different states. The form letter originated from Illinois and was only counted once. All correspondences originated in the U.S.

Table 3. Correspondence Distribution by State

State	Percentage	Correspondences
DC	12% total	5 total
MD, VA, NC, CO	7% each, 28.5% total	3 each, 12 total
IL, NJ, UT, PA, NY, FL	4.8% each, 28.5% total	2 each, 12 total
WI, DE, OH, CT, NM, TX, KY, NV, IN, CA, OR, NE, WA	2.4% each, 31% total	1 each, 13 total

The NPS classified scoping comments received within each correspondence by assigning comment topic codes using the PEPC system. Comment codes assigned to correspondences are provided in Table 4. An individual comment may have multiple codes assigned. The 42 correspondences were organized into 89 scoping comments covering 15 topics. Given the limited number of correspondences, all comments were considered. Substantive comments are summarized below by topic area.

Table 4. Correspondence Distribution by Topic

Code	Description	Correspondence	Comment Summary
AA100	Alternatives (Proposed, No Action, and Dismissed)	32	Many comments noted the importance of the proposed action in terms of preservation of an iconic vista. Some comments suggested consideration of additional wall heights and/or green infrastructure. These scoping comments are summarized below with representative comments.
PN100	Purpose and Need	19	Comments received suggested that the purpose and need be shifted toward long term resiliency to mitigate flooding and sea level rise. These scoping comments are summarized below with representative comments.
CC100	Climate Change	15	Some comments suggested consideration of different projected future climate scenarios. One comment recommended interpretive signage on the impacts of climate change on the Park.
CR100	Cultural and Historic Resources (Includes Aesthetics)	11	Many comments expressed support for preserving the cultural landscape. Several comments included concerns about the potential impacts on the cultural landscape in areas of the Tidal Basin outside of the project limits.
VU100	Visitor Use and Experience (Includes Safety)	9	Several comments pertained to access, multi-use trails, and pedestrian walkways in context of short- and long-term potential impacts (adverse and beneficial) to visitor use and experience resulting from the proposed action.
VE100	Vegetation	7	Several comments noted tree impacts (particularly cherry trees) resulting from existing conditions. Some comments recommended protection of the critical root zone from pedestrian traffic as well as replanting scenarios.
CU100	Cumulative Projects	4	Comments related to long-term planning and other projects or initiatives will be considered in the cumulative impact analysis. The Tidal Basin Master Plan was referred to specifically in several comments.
TR100	Transportation and Traffic	4	Several comments pertained to traffic, hauling, and accommodations for bicyclists in context of short- and long-term potential impacts (adverse and beneficial) to visitor use and experience resulting from the proposed action.
WE100	Wetlands and Waterways	4	Several were made on use of water flow/flood modeling in the analysis and consideration of natural wetland buffer alternatives.
WQ100	Water Quality	3	One comment asked how the new structures would impact water quality. Another comment suggested promoting infiltration to minimize runoff of nutrients.
WH100	Fish and Wildlife, Habitat	3	Some comments express support for protecting or enhancing riparian wildlife habitat. One comment asked how the new structures would impact habitat and fisheries.

FL100	Floodplains	3	Some comments suggested consideration of different projected future flooding scenarios.
GS100	Geology and Soils	3	A few comments concerned erosion and sediment control and geologic conditions. The <i>FDR Memorial Legacy Committee</i> requested a geologic map or study that demarcates the location and extent of bedrock in the affected area of the Tidal Basin and mapping of expected land settling.
PO100	Park Operations and Management	2	Comments acknowledged security operations and the infrastructure maintenance.
EJ100	Environmental Justice	2	One comment asked how members of disadvantaged communities might benefit from this project. Another comment encouraged the NPS to reach out to a broad range of entities and groups to foster strong public participation, including representatives of the national and local disability community to ensure full consideration of accessibility issues, and members of underrepresented groups (women, immigrants, and LGBTQ+ individuals, Native Americans, Asian Americans, Native Hawaiians, Pacific Islanders, Black Americans, and Latino Americans).

COMMENTS BY TOPIC

Purpose and Need

- Comments received suggested that the purpose and need be shifted toward long term resiliency to mitigate flooding and sea level rise. Representative comments:
 - “There is an alarming comment near the beginning of the presentation that is never fully eliminated by the plans presented, and that is the comment re the Purpose of the project that the project would "provide some protection !!! Even after the presentation, the qualifying word ‘some’ haunts.” (Correspondence ID: 46).
 - “A Resilient Solution: Will raising the historic walls' height even prevent future flooding? Where is the data to support the proposed height of new walls? Why is our goal limited to restoring the ‘historic’ location and character of the seawalls?” “The stated purpose of the action is to...The Coalition believes this purpose is insufficient for the challenges we are now facing. One portion of the Tidal Basin and West Potomac Park seawalls cannot be studied, evaluated, and improved in isolation from all the associated lands that also are flood prone. Rather, it is imperative to see floods and seawall deterioration as interconnected. For example, raised seawalls in the project area could potentially exacerbate the flooding problem downstream, diverting floodwaters further southward and causing devastating damage to other parts of the Tidal Basin, the beloved cherry trees, the Southwest Waterfront, and further downstream. Similarly, increased flooding from storms and impacts from sea -level rise due to climate change may make the proposed seawall restoration inadequate to meet the changes. The Coalition believes that NPS should take this moment, at the beginning of the NEPA and Section 106 process, to assess and amend the purpose of the action.” (Correspondence 44, *National Mall Coalition*)

Alternatives

- Many comments noted the importance of the proposed action in terms of preservation of an iconic vista and preservation of public open space.
- Concerns were raised that the current proposed action does not account for all flooding events and if other alternatives are under consideration to alleviate current and future flooding events or provide for any necessary future extension of the proposed seawall level and additional sea wall heights. Requests were made to consider the implementation of resilient design concepts (including green stormwater infrastructure) during the EA process.
- The DC SHPO provided the following comments (Correspondence 43):
 - “Noticeable differences from the historic conditions and the likely requirement for total disassembly and reconstruction in most, if not every segment will almost certainly result in adverse effects on the historic seawalls but we agree that this work is essential and that replicating the historic conditions as closely as possible may be one of the best ways to minimize the adverse effects. To that end, we look forward to receiving the detailed, section-by-section photographic log of the seawalls that the NPS indicated was being prepared. The photographic log will better document the existing conditions and serve as a useful tool to minimize adverse effects when compared against typical sections illustrating original construction methods, later alterations and the proposed rehabilitation approaches. Comparing these various factors will allow informed decisions to be made about how and where historic conditions can be replicated as much as possible.”
 - “We also look forward to evaluating the effects of the undertaking by reviewing detailed site plans and similar documents that compare historic, existing and proposed conditions as they relate to walkway dimensions and locations, planting plans, and physical connections to notable features such as the Inlet Bridge. Specifically, a variety of comparative renderings should be developed for review. These should illustrate comparative views at specific locations as well as broad views across the basin and the river.”
 - “The specific rehabilitation methods for the current project are still being developed, but we also understand that complete reconstruction, using as much original material as possible, is likely to be required. The extreme flooding conditions we witnessed during the site visit attest to the urgency and need for this project.”
 - “We agree that the proposed APE should be sufficient to take into account the direct and indirect effects of the project but would appreciate clarification regarding the location of any project staging areas. The APE may need to be revised if any staging areas will be located beyond the proposed boundaries”
- Representative comments from the *Committee of 100 on the Federal City* (Correspondence 15):
 - “How was the metric of 15 hours of flooding determined?”
 - “What is the source for data on future water levels and future rare storm events?”
 - “In the future, what additional height can be accommodated on the rebuilt seawalls supported by pilings?”

- “The section of the existing trail from the Arlington Memorial Bridge to the Tidal Basin, then curving up south of the Jefferson Memorial and turning southwest to continue down Maine Avenue, is a very important part of the Washington Waterfront Walk (see attached map). It is important that when this section of the existing trail along the Potomac River waterfront is rebuilt, it has adequate width for walkers and bicyclists. It appears that the proposed walkway a plus or minus 18 feet at Tidal Basin East and West will be adequate, as will the transition to grade at West Potomac Park North and South.”
- Representative comments from the *FDR Memorial Legacy Committee* (Correspondence 42):
 - “In the Project Area Map on page 11 in the PowerPoint from the public scoping meeting on July 19, the FDR Memorial as well as the MLK Memorial are not identified. It is critical to clearly identify all Memorials and critical assets so the public has a true rendering of the project and its potential impacts”
 - “We ask for hydrodynamic water flow models and a detailed map and plan that include elevation modeling for the entire Tidal Basin for all of the planned phases of the project. This is critical as stakeholders need to understand how the continuation of the proposed seawall repair around the Tidal Basin impacts all sites and assets throughout the length of the multi-year project.”
 - “Increased rainfall and land settling: How is increased rainfall being considered in the planning for the elevated seawall around the Tidal Basin? How would water not get trapped within the FDR Memorial (or MLK or elsewhere) if the seawall was elevated by two to three feet and land settles more?”
 - “What will happen to the water that overtops or flows around the seawall?”
- Representative comments from the *National Parks Conservation Association* (Correspondence 45):
 - “Alternative climate scenarios: Project alternatives must consider additional sea wall heights coupled with green stormwater infrastructure based on various scenarios of climate change projections for sea level rise and flooding.”
 - “During the public meeting, held on July 19, 2022, it was unclear what data were used to predict future storms and associated flood height. Because climate change projections can vary greatly, it is imperative the Environmental Assessment consider different projected future flooding scenarios and plan accordingly. If the data used to determine sea wall height underestimate future flooding events, the rehabilitation work will fail to protect the Tidal Basin, its cultural resources, and human safety.”
- Representative comment (Correspondence 3):
 - “How will you incorporate sidewalks around the rebuild areas? (no photos show the top view, or side view).”
 - “If yes to sidewalks what width to accommodate crowds? Will you have fencing, railings? Will you have seating and view points?”
 - “I hope you will double trees and planting?”

- Build bio-swells to collect rain?”
- Representative comment (Correspondence 2):
 - “Will the project timing mesh with the Cherry Blossom Festival crowds? For example, at Jefferson I was disappointed to see the huge construction wall take up half just as the 2022 festival was beginning. Could that wall have waited another month until the crowds were less?”
- Representative comment (Correspondence 40):
 - “The proposal could be strengthened by a more holistic project that includes accessibility at the Thomas Jefferson Memorial, security at the Jefferson Memorial, and a sustainable plan for how to protect, replant, and/or replace the cherry trees. The plan does not address protection of the critical root zone of cherry trees from pedestrian traffic. Soil compaction from heavy pedestrian loads could be addressed with additional strategic planning, and landscape architectural work in tandem with the engineered solutions”
- Correspondence 1 requested saving the tidal lock.
- Correspondence 38 provided suggestions for material use.
- Correspondence 45 recommends educational signage regarding the effects of climate change on the park.

Other Comments

Two (2) comments included links to external articles listed below. Copies of the articles are incorporated into Appendix A under correspondences 14 and 42 from an unaffiliated individual and the *FDR Memorial Legacy Committee*, respectively. In addition, Appendix A includes a map of the proposed Washington Waterfront Walk from the *Committee of 100 on the Federal City's* correspondence 15.

1. “Repairs to begin on Tidal Basin flood gates”. WTOP News. April 4, 2022.
2. “Can nature-based alternatives to seawalls keep the waves at bay?” US News. August 12, 2022.

The *FDR Memorial Legacy Committee* requested Section 106 consulting party status. The *National Trust for Historic Preservation* requested to be included in the distribution list for notices of any future consultation meetings and the circulation of any documents for comment. The DC SHPO recommended that organizations housed in buildings adjacent to the Tidal Basin (e.g., Bureau of Engraving & Printing, the Holocaust Museum, etc.) also be notified and invited to participate, along with *the National Mall Coalition*, the District Department of Energy and Environment (DOEE), and any other entities with potential interest in the project and its effects.