The Committee of 100
on the Federal City

Comments to the National Park Service on the
Battleground National Cemetery Landscape & Accessibility Project
Submitted October 4, 2024

The Committee of 100 on the Federal City is the oldest citizens planning organization in Washington DC. Since establishment in 1923, our mission has been to safeguard and advance the fundamental planning, environmental, and historical values that give Washington its cultural distinction, natural beauty, and overall livability.

Starting well over 20 years ago, the Committee of 100 has been concerned about the Civil War Defenses of Washington (CWDW), which are managed by the National Park Service. In 2003, after extensive research and outreach to many agencies, organizations and knowledgeable individuals, we presented our comments on the NPS draft management plan for what were then known as the Fort Circle Parks. Our report, "A Call to Action on the Fort Circle Parks Draft Management Plan" dated August 15, 2003, was the most comprehensive review of the NPS plan, and many of our recommendations were subsequently implemented.

Battleground National Cemetery is affiliated with the CWDW as the final resting place of 41 soldiers who fought in the Battle of Fort Stevens (July 11-12, 1864). It was the only Civil War battle in the nation's capital and the only time a sitting President (Lincoln) has come under direct enemy fire. As hallowed ground, Battleground National Cemetery deserves the highest level of care, which it has not always received, although NPS management has greatly improved over the past decade.

With regard to the current project, we applaud the National Park Service for addressing Battleground's cultural resource and public accessibility needs. We have reviewed the concerns raised and suggestions made by the Alliance to Preserve the Civil War Defenses of Washington, and we concur with them. So rather than reiterate what has already been said, we would like to emphasize our concerns about the NPS's lack of due diligence with regard to meeting its statutory and regulatory requirements under Section 106 of the National Historic Preservation Act. In that regard, we hope our comments will lead NPS to improve.

We especially share the Alliance's concerns that organizations such as ours, which have shown a demonstrated interest in the subject, were not invited to participate in the early planning process, as required by the regulations promulgated by the Advisory Council on Historic Preservation (ACHP). Indeed, we have participated in numerous Section 106 reviews with other Federal agencies, including the DOD, GSA, DOT, and State Department. While we may have sometimes disagreed with them on the content of our positions, we appreciated their inclusion of us at early stages where our input could be most valuable.

Furthermore, like the Alliance, we were shocked at the July 31, 2024 Zoom meeting to be told we would only have 30 days to comment on the project. NPS noted that the 2013 Cultural Landscape Report for was the basis for the NPS plan, but they had no printed copies to provide of the 79- page report, which was only available online. They also provided no explanations of the Architectural Barriers Act Accessibility Standards (ABAAS), which we were unfamiliar with and would have had to separately research.

We therefore concur with the Alliance's recommendation that NPS "work with the ACHP to improve its internal policies for compliance with the National Historic Preservation Act and to provide Section 106 training for staff." This could greatly improve NPS's 106 compliance on future projects.

Thank you for the opportunity to comment,

Kirby Vining, Chairman
Historic Preservation Subcommittee