

Poplar Point First Internal Draft DEIS – NPS Response 05/11/2010

As it currently is written, this first internal draft of the Redevelopment of Poplar Point EIS would not be cleared as legally adequate under NEPA and would not be cleared as legally adequate for any future decisions on the DC Lands Act. As a result, the DOI would not submit it to EPA for the Federal Register and the Secretary of the Interior would not be in the position to certify the DC plans.

It is recommendation of the Solicitor's office that a new draft EIS be developed that addresses the NPS comments and concerns. Information in the original document that is accurate and relevant may be utilized, but the level and depth of the NPS's comments will require a substantial reworking of the document.

General Comments:

- The purpose and need statement should line up with the DC Lands Act and include the discussion of relocating NPS and USPP facilities.
 - DC can add more requirements but cannot eliminate existing requirement
- The document tries to sell the notion of Poplar Point, and casts Anacostia Park as an underutilized parcel of property.
- Need to identify decisions being made on this EIS, e.g.;
 - Land use plan for Poplar Point
 - Placement of NPS and USPP facilities
 - Adoption of land use plan by DC
 - Decision to move NPS and USPP by DC and NPS
 - Secretary certifying the land use plan adopted by DC
- Need a history on how the decisions that were carried forward in the DEIS were made (e.g., What process was used to determine the site for aviation? What was the agreement for the north field (function vs. acreage)?).
- The alternatives, including those dismissed, should be per the DC Lands Act
 - E.g., Alternatives do not comply with the Anacostia Waterfront Framework Plan to the extent practicable. The Anacostia Waterfront Framework Plan needs to be upfront and not buried as just another potential requirement.
- Those alternatives that were dismissed need a legitimate explanation why they are not reasonable, per CEQ standards
- The only mention of the relocation of park service facilities in the alternatives chapter is a bulleted item that states "If determined necessary, the relocation of the NPS and USPP facilities." This is wrong, in all action alternatives the relocation of the NPS and USPP facilities would be required.

It goes on to read, "Although each of these stipulations is addressed in all of the alternatives, they are achieved through a variety of strategies. For example, while each alternative has designated at least two memorial sites, the locations may vary. One strategy consistent between all of the alternatives is that the USPP facilities would be relocated off-site. A further discussion of how these stipulations would be met can be found under the respective descriptions for each alternative."

Discussion of where the USPP facilities are to be located is not included in any maps or descriptions of the alternative. And it is technically not “off-site” it will be located on park property in the north field. In addition, NPS facilities, including USPP, are not adequately described in terms of required space and programming needs.

There is no real discussion of potential locations for the NPS and USPP facilities, nor any real analysis on the potential impacts of moving these facilities. One of the first actions that need to occur after Poplar Point is transferred to the District is the construction of these new NPS facilities. The EIS needs to have enough detail on what the actual impacts these facilities will have on the human environment so construction can take place.

- The EIS lists two environmentally preferable alternatives. You can only have one environmentally preferable alternative. If your selected alternative differs from the environmentally preferable alternative, then you need to explain that.
- Problems Factually:
 - History of the park, park names
 - Current uses (e.g., Uses by NPS and USPP, and public use)
 - Proposed future uses
 - Treatment of hazmat
 - What the DC Lands Act actually calls for
 - Document makes reference to “Land Transfer Agreement” signed by Congress – do not understand this reference.
 - Other – Makes reference to the Navy leasing parkland to DC for tour buses (?) and HHS operating St. Elizabeth’s starting in 1852 (?)
- Beside the insufficient discussion of the proposed NPS and USPP facilities, overall environmental analysis lacking, questionable, and inadequate
 - Effects discussions do not provide sufficient rationale as to why the proposed actions would result in certain impacts.
 - Inadequate cumulative impact analysis
 - Cumulative impact analysis needs to describe what projects have cumulative impacts on the particular resource, they need to describe the impacts in terms of beneficial or adverse, impact threshold (only for adverse impacts), and duration.
 - Incomplete or inaccurate description of cumulative impact projects
 - St. E’s
 - Bolling AFB/BRAC
 - CSO LRP
 - Status of GSA-DC and the DC Lands Act
 - Little if any discussion on traffic
 - Inadequate impairment discussions
 - Does not apply standards and does not set out facts
 - Irrelevant and marginally relevant text repeated throughout the document.
- Consultations – What consultations have occurred with FWS, NOAA, COE, EPA?
- What appendices will be included as part of the EIS?

It is the recommendation of NPS that a meeting with DMPED be organized to discuss the broad overarching issues with the document. In addition, the NPS recommends that following this initial meeting, NPS, DMPED, and the contractor reconvene for a one-day roundtable discussion to discuss specific issues on the DEIS. Specific comments citing page and line number will be provided prior to the initial meeting with DMPED.

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National Park Service National Capital Region – Comments

(Please provide comment to Joel Gorder)

No.	Comme nterGor der	Page	Line number	Comment	Comment Response
1	Gorder			<p>General Comments:</p> <p>Remember, we are not trying to “sell” this project, we need to speak objectively.</p> <p>Need references to the figures in the body of the text.</p> <p>Scrub the document of the terms Major and Significant when they are used as adjectives and not associated with NEPA terminology.</p> <p>Need consistency when using acronyms. Many instances where National Park Service and NPS are used interchangeably.</p> <p>To avoid confusion, please change the font between different headings and subheadings.</p> <p>The document reads with many voices. Need consistency in the document.</p>	
2	Gorder	1-2	12-19	<p>Entire paragraph is editorial and does not account for the values of the park; there are a number of people who believe that Anacostia is fine the way it is currently managed. Delete.</p> <p>This document is not meant to “sell” the project and we need to talk about it as objectively as we can.</p>	
3	Gorder	1-3	1-4	Move paragraph up to previous paragraph.	
4	Syphax	1-3	8	Adjust to read “wetlands and wildlife... ”	
5	Gorder	1-3	5-20	The information presented in these two paragraphs seem out of order. Also, in the paragraph starting on line 9, need to provide the reasons the lands act came about. Why	
6	Syphax	1-3	26	Omit the part that states “the condition of the northern section of PP has deteriorated over time” ... or explain.	
7	Gorder	1-3	21-26	<p>Again, statements like this paragraph makes the reader assume that the site is currently not used and has little value as a park.</p> <p>Also, please refrain from using terms like “local treasure” Lets talk objectively.</p>	

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No.	Comme nterGor der	Page	Line number	Comment	Comment Response
8	Gorder	1-4	4-10	Make mention that it is also being done in accordance with DO-12.	
9	Gorder	1-4-1-5	21-5	Split up the first sentence stating that “The purpose of the project is to...” “This project is needed because...”	
10	Syphax	1-5	33	Delete 3 rd bullet regarding the PP mission is to “Establish Ecological Functions.” First of all, this is not a reason for the PP project. This project destroys far more ecological functions than it could ever improve. Therefore, this is not something to dwell on or highlight. For example, a quick review of the site’s eco-inventory suggests that approximately 75% of the wildlife species documented at PP will be destroyed, or will not survive long with this project going forward as planned.	
11	Syphax	1-6	6-10	Reword this paragraph. It may be a goal of the PP project to incorporate environmentally-friendly features whenever possible, but the intent is not to improve the Anacostia environment.	
12	Gorder	1-6	13-18	Edit paragraph to read: The site is currently owned by the federal government and has been moderately is used as public parkland since its inception . The site is prominently located along the Anacostia River waterfront, and has the potential to provides many public recreational uses such as hiking, picnicking, birdwatching, boating, and many other passive and active recreational activities alike. Unfortunately, there are portions of the park that are the site has been largely inaccessible and underutilized due to the surrounding infrastructure and ground contamination.	
13	Syphax	1-6	13-18	Acknowledge that sections of the study area are very accessible, and are used –currently-- for major soccer league activities and other ballfields, fishing, birding walking/jogging, crew race viewing, and more.	
14	Syphax	General		If the North Field is to be considered for relocating the USPP, then add major sections on it... assessing the impact to recreation, to the Anacostia River, to the Anacostia River, on historic resources, Etc.	
15	Syphax	General		Add alternatives that include USPP Aviation remaining in PP... not North Field.	

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No.	Commenter	Page	Line number	Comment	Comment Response
16	Syphax	Throughout		Enlarge font on figure legends.	
17	Gorder	1-6	23	“...breeding ground for mosquitoes, which carried malaria and;	
18	Gorder	1-6	33-34	Last sentence is confusing. You state “another problem...” What was the first problem? What type of contamination are you talking about? This statement would have the reader assuming that the entire site that was made up of fill materials was contaminated?	
19	Gorder		35	Please correct this globally, these are not NPS headquarters, this is the headquarters for National Capital Parks – East, and US Park Police. There is no mention of National Capital Parks - East to this point, and it should be.	
20	Gorder	1-7	3-12	Again, you state “another alteration to Poplar Point’s Natural features...” You never spoke of “natural features” previously. Also, where is Stickfoot Creek? What’s it look like? How big is it? Where can I see it on a map?	
21	Gorder		14-35	This information should be provided earlier in the document to give the reader a sense of where the action is located, and should reference a map. Also, line 23, revise to state near to or adjacent to the project area, within the vicinity is confusing.	
22	Gorder		Figure 1-2	Is the figure meant to look washed out? Where in the text is this figure referred?	
23	Gorder	1-8	17	What are the 10 subareas? Then you describe the outermost boundary, then the figure shows three areas? Very confusing.	
24	Syphax	1-8	Fig 1-2	Shouldn’t this image match PP land mass in Lands Bill Around 11 th Street Bridge)?	
25	Syphax	1-8	16-23	Study Area Description is very unclear. Add North Field	
26	Syphax	1-9	Fig. 1-3	Include North Field in Study Area.	
27	Gorder	1-9	6-15	Paragraph is poorly written, who has a renewed sense of interest and is considering it a target for reinvestment. There will be some people who will	

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No.	Commenter	Page	Line number	Comment	Comment Response
				see this new wave of reinvestment as gentrification.	
28	Syphax	1-11	12-14	The actions proposed in this draft EIS violate this stipulation.	
29	Syphax	1-11	20-24	The actions proposed in this draft EIS are not in keeping with the spirit of EO 13508.	
30	Syphax	1-11	30-33	The actions proposed in this draft EIS are not in keeping with DO-12.	
31	Syphax	1-13	11-12	Omit this, or add options. The document suggests that there is only one option... North Field. The NPS has reviewed that option and it's wrong. The only thing to do is to leave USPP at PP.	
32	Gorder	1-13	1	Need some sort of introduction to section 1.4	
33	Gorder	1-14	Sec. 1.5	Provide some general statements on what public reaction to the project has been "Issues". Line 12, what museum collections are you referring to? If none, dismiss.	
34	Gorder	1-15	Sec 1.6	Please provide some reasoning why these impact topics were chosen.	
35	Gorder	1-16	6	Prime farmlands is associated with soil type, since most to the soils on the site is fill material, and not classified as Prime farmland soils, then it would be dismissed. As it is written, it is not fully correct.	
36	Gorder	2-3	Fig 2-1	General comments: There is a currently floodgate that surrounds the NPS facilities that is not shown. What do the purple arrows represent? Also, why isn't the non-wetland forested/vegetated areas not labeled? The symbol you have for levee (spelled wrong on map) in the legend is labeled 100' wetland buffer per DDOE on the map. If this is a map of the existing conditions, why are you showing the historic shoreline? What function does it serve?	
37	Gorder	2-4	Sec 2.2.1	Should be labeled elements common to each action alternative and this	

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No.	Comme nterGor der	Page	Line number	Comment	Comment Response
				section should come after the description of the 'no action'.	
38	Syphax	2-5	7	Why is this line here?	
39	Gorder	2-5	7	<p>The only mention of the relocation of park service facilities in the alternatives is this line <u>"If determined necessary, the relocation of the NPS and USPP facilities."</u></p> <p>This is wrong, in all action alternatives, this would be required. There is no mention or maps showing the location of the aviation facilities, the proposed planning for the North Field, or description of any programming requirements.</p> <p>The next paragraph confusingly reads: "Although each of these stipulations is addressed in all of the alternatives, they are achieved through a variety of strategies. For example, while each alternative has designated at least two memorial sites, the locations may vary. <u>One strategy consistent between all of the alternatives is that the USPP facilities would be relocated off-site.</u> A further discussion of how these stipulations would be met can be found under the respective descriptions for each alternative."</p> <p>First off, further discussion of where the USPP facilities are to be located is not included in any maps or descriptions of the alternative.</p> <p>Secondly, NPS facilities, including USPP, are not adequately described in terms of required space and programming needs. This EIS has to provide enough detail on these park service facilities</p> <p>The NPS structures will be the first structures that are built under any action alternative that is chosen. This would be a good fact to include.</p>	

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No.	Comme nterGor der	Page	Line number	Comment	Comment Response
				Also, where is the discussion of the work to be done on the North Fields? Cannot find it anywhere in the document.	
40	Gorder	2-5	No Action Alternative	<p>The no action alternative should be written as the way the area is currently managed and not as a testament to why an action alternative should be selected. Discussions of areas of contamination and use should be done in the affected environment and environmental consequences section.</p> <p>Do not use the term “significant” find synonym.</p> <p>Line 31-32 The statement “The NPS and the USPP would remain in their current facilities, which meet their current needs, but may not allow ample opportunity for future considerations.” Where is this information from? Is there a reference? If no reference delete.</p> <p>It does not seem that there has been any communication with the park to see how the site is actually managed.</p> <p>Line 12-24 these are cumulative impact scenarios. The No Action is a description on how the site is currently managed, speculation on future conditions should not be made here.</p> <p>Line 25 – You need to scrub the document for value based statements like “...and most importantly...” there is a very large contingency that would like to see the site remain under NPS and stay the way that it is.</p> <p>Figure 2-2 is missing.</p>	

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41	Syphax	2-6	4-10	Reword this to acknowledge the fact that the Park is preparing documents needed to clean-up environmental contamination at PP and that it was about to release a Draft General Management Plan for Anacostia Park, including PP when DC Lands Bill came up.	
42	Syphax	2-7	6-10	Is the pedestrian bridge truly feasible? Would large boats be able to pass below it? Elaborate...	
43	Gorder	2-7	5-6	Why is it a “unique” resource? What is unique about it? Also, you talk about educating the public on wetlands...How would this be done and by whom?	
44	Gorder		Action alternatives General comments	May want to provide some rationale as to how building heights and GSF of retail, residential, office and civic/cultural uses were determined. Maybe under actions common to all. Fig 2-10 Missing the star shape in the ledgend.	
45	Syphax	2-12	Fig. 2-6 and all alts.	Far too many boardwalks and trails through the wetlands. For environmental and habitat reasons, reduce them significantly.	
46	Syphax	2-13	1	The buildings are too tall. Remember the viewshed protection concepts.	
47	Gorder	2-27	9	Why don’t we use the actual year the AWI came out as opposed to saying “shortly after the turn of the century...”	
48	Gorder		Section 2.3	Why are we talking about the evolution of planning under alternatives considered but dismissed? The AWI has already been discussed, and this section does not say anything useful. Soccer stadium efforts - You cannot dismiss something by saying that the effort was ultimately unsuccessful. You need to provide more information why this was dismissed; there are many people who want the soccer stadium built. Developer Solicitation Process: You provide no reasoning why any of these developers were dismissed.	
49	Gorder	2-31	2.3.2 Current Planning	This is discussion on how the alternatives were developed, not about what was dismissed. This is useful information, but it does not belong here.	

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No.	Commenter	Page	Line number	Comment	Comment Response
			Effort Alternative Development Process		
50	Gorder	2-34	Section 2.5	Change “environmentally preferred” to “environmentally preferable” Also, you cannot have two environmentally preferable alternatives. Its either the no action or alternative 1. Also, for an eis the discussion should take into account the 6 criteria listed above. And compare them with the other alternatives.	
51	Syphax	2-34	21	Note #4	
52	Syphax	2-35		Explain Stickfoot Creek filter system.	
53	Syphax	2-36, 2-37		We would like to see and comment on the complete matrix	
54	Gorder	2-25		Need a section before Section 2.3 discussing mitigations.	
55	Gorder	3-3	2-5	The way this is written is seems that there is little public open space. There is 40 acres according to your map. Also in figure 2 – existing land uses. Number 2 is labeled former nurseries. What is the current use? If they are fenced off and closed say so in the map. How is the red area next to the number 4 defined? Also there is usable space that in the yellow portions of the map (3), these should be mentioned in the description.	
56	Syphax	3-3	Fig. 3-2	Update Zone 7	
57	Gorder	3-4	4-6	Delete “ The NPS and Park Police facilities are planned to be relocated to the north end of Anacostia Park, near the CSX railroad, as part of the Poplar Point redevelopment. The Park headquarters is to remain at Poplar Point near Good Hope Road. ” This is the affected environment section, which described the current condition of those resources that will be affected by the proposed action. This statement is the proposed action, and should be discussed in the environmental consequences section where the impacts of the	

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				proposed action on the resources described in the affected environment are analyzed and described.	
58	Gorder	3-6	3.1.1.3	Should have a map showing these areas.	
59	Gorder	3-8	6-11	This is a cumulative impact project, since it has yet to be implemented. Move to cumulative impacts.	
60	Syphax	3-8	6-11	Omit references to housing improvements at Barry Farm Playground. The land has underlying federal ownership, is for recreation, and housing development is unauthorized and not approved for that site.	
61	Gorder	3-8	16-17	What does this first sentence have to do with Birney Elementary school? Seems like a random sentence.	
62	Gorder	3-9	1-7	Again, this is a cumulative impact project.	
63	Gorder		Sections 3.1.2.1, 3.1.2.2, 3.1.2.3, and 3.1.2.5	This section belongs in Chapter 1. These actions will not be affecting Federal Plans and Policies. And that is why they were not discussed in Chapter 4. You may want to consider taking these sections and putting them into an appendix. I did not realize how many pages were devoted to this.	
64	Syphax	3-13	23	The actions proposed in this draft EIS are not in keeping with this element.	
65	Syphax	3-14	17	The actions proposed in this draft EIS are not in keeping with this policy.	
66	Syphax	3-14	20	The actions proposed in this draft EIS are not in keeping with this policy.	
67	Syphax	3-14	23	The actions proposed in this draft EIS are not in keeping with this policy.	
68	Syphax	3-14	25	Some of the actions proposed in this draft EIS are not in keeping with this policy.	
69	Syphax	3-14	26	Some of the actions proposed in this draft EIS are not in keeping with this policy.	
70	Syphax	3-14	27	The actions proposed in this draft EIS are not in keeping with this policy.	
71	Syphax	3-15	13	The actions proposed in this draft EIS are not in keeping with this policy.	
72	Syphax	3-15	5, 33 &	Typo... Capital, spelled w/ an "a," unless referring to the building.	

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No.	Comme nterGor der	Page	Line number	Comment	Comment Response
			throughout		
73	Syphax	3-16	11	The actions proposed in this draft EIS are not in keeping with this policy.	
74	Syphax			Discuss flooding and the three authorized levees. What happens to them?	
75	Syphax	3-23	30	The actions proposed in this draft EIS are not in keeping with this policy.	
76	Syphax	3-27	6	The actions proposed in this draft EIS are not in keeping with this policy.	
77	Gorder	3-37 to 3-39		If you included a simple zoning map it would be a lot easier to comprehend, and you would not need all of text.	
78	Gorder	3-41	6-9	The following statement is so ambiguous that it provides no useful information. “Numerous community and public facilities, public and private schools, places of worship, parks and recreation facilities, police stations, and fire stations that support the neighborhoods of Ward 8 are located throughout the area surrounding Poplar Point.”	
79	Gorder	3-42	3-8	Are there enrollment numbers for these colleges?	
80	Gorder		3.1.3.2	It is really confusing when you discuss open space resources and not state whether they are within the project area or not.	
81	Gorder	3-45	1	You make no mention of the impacts to all these churches in chapter 4. If you discuss something in chapter 3 you must discuss it in chapter 4.	
82	Gorder		Section 3.1.3.3	The order you discuss emergency services/public safety and medical services is different than the way its presented in chapter 4.	
83	Gorder	3-45	34-37	The sentence “The project site is within two of the District of Columbia’s seven Police Service Areas (PSAs), PSA 703 serves the western portion of the site and PSA 701 serves the eastern portion of the site.” needs to be described better. It’s a little confusing.	
84	Gorder	3-46	1-4	You state in the past year, but you use 2007-2008 data. Also, two years does not indicate any trends. It is not clear what you are trying to get across. Also in chapter 4 you do not discuss these crime statistics. If you have them here you have to discuss them in chapter 4. I would delete this section.	

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No.	Comme nterGor der	Page	Line number	Comment	Comment Response
85	Gorder	3-47-3-50	Sec 3.1.4	Most of this information is just definitions of terms and can go away or written into the actual discussion of the demographics. You don't really need a methodology section if you are looking at census data.	
86	Gorder		Sec 3.1.4.2 – 3.1.4.5	You go into great detail describing demographics by population, race, gender and age, educational attainment, households and household composition, However in you impact analysis you basically just talk about numbers of people moving in, and changes in property values. Why go into such detail if you are not going to use the information in your impact analysis?	
87	Gorder	3-66	17	Number missing at end of sentence	
88	Gorder		Sec 3.1.6.4	I think it would be more useful if this discussion pertained to the District, rather than the DC Metropolitan Area, which also includes MD and VA. Or if you're going to talk about it, state what the Metropolitan Area is defined as.	
89	Gorder		Table 3-20	The Federal Government does not rank in the top 10 employers in DC?	
90	Gorder		Section 3.2.1.4	Is there any way to condense the 20 pages of background and historical significance? How about summarizing the high points and put this section into an appendix.	
91	Gorder		Section 3.2.1.5	Comments will be provided by Stephen Potter	
92	Gorder		Figure 3-46	Why is this so washed out?	
93	Gorder		3.2.2.2	This is not a description of the affected environment, this belongs either in EQ or in chapter 1.	
94	Syphax	3-85	Fig.3-12	Expand boundary of Area of Potential Effects to historic resources to include the North Field (unless that concept is dropped)	
95	Syphax	3-112	20	Expand boundary of project area and archaeology.	
96	Syphax	3-133	3	Typo... Capital, spelled w/ an "a," unless referring to the building.	
97	Syphax	3-134	3	Typo... "Poplar"	
98	Syphax	3-139	Fig. 346	Expand boundary of Project Site to include North Field (unless that concept is dropped)	

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No.	Comme nterGor der	Page	Line number	Comment	Comment Response
99	Syphax	3-141	3 & 7	The actions proposed in this draft EIS are not in keeping with these policies.	
100	Syphax	3-141	9	Typo.... Words run together.	
101	Syphax	3-143	7	Typo... Capital, spelled w/ an “a,” unless referring to the building.	
102	Gorder	3-141	20-28	I have seen this language in other documents, so the document that it was cut and pasted from should probably be referenced.	
103	Gorder		Figure 3-48-49	Those are the two shots of Poplar Point that were chosen? One of a road and one with rusty roofs on a cloudy day? Seems like more than two photos could have been provided to help describe the visual resources of the site.	
104	Gorder	3-148	1-10	Why isn’t the description of Anacostia Park included with the Poplar Point description? The way this is written is doesn’t seem that Anacostia Park is not connected to Poplar Point.	
105	Gorder		Visual Resource Section	This chapter is the Affected Environment Chapter. Describing those things that will be affected if the proposal goes forward. If the Poplar Point redevelopment is not visible from one of these described locations (i.e., capital hill) why is it being described? Figure 3.65...What is the point of including a photo of National Airport taken from Gravelly Point?	
106	Gorder		Section 3.3.1	Need to make this information more understandable to the non-geomorphologists.	
107	Gorder	3-154	Figure 3.59	First off, the photo is not looking north from Poplar Point, it was taken across the street. Also, the stadium is to the northwest of poplar. Also the photo was taken across the street, which is on the wrong side of the river to be on Poplar Point.	
108	Gorder	3-165	7	They are not “considered” they are part of the Chesapeake Bay Watershed.	
109	Gorder	3-165	36	What wetland investigation? What type of surface water body? Paragraph does not provide much information.	
110	Gorder	3-168	22-26	Explain what these are.	
111	Syphax	3-170	4	Discuss the three authorized flood control levees.	

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112	Syphax	3-171	Fig 3-67	Acknowledge that the boundaries of the existing floodplains depicted, are because of the three authorized levees.	
113	Syphax	3-177	5	Delete sentence referencing wildlife are common species. It is inaccurate. Several documented species at PP are quite unusual.	
114	Syphax	3-177	20	This paragraph needs to be significantly expanded with more species discussed .	
115	Syphax	3-177	30	This section needs to be significantly expanded with more species, and their habitat requirements, discussed. Discussion must include DC (animal) Species of Management Concern... how many are present at PP? What are their habitat requirements? How will project affect them? (<u>Nesting</u> willow flycatchers, seaside sparrow, wild turkey, barred owls, wood frogs, etc.) Similarly, discussion on what special vegetation is at PP? What are the habitat requirements? How will project affect them? Include list of DC Species of Management Concern.	
116	Gorder	3-177	20-29	Line 27, what type of eagles? Migratory Birds? Does the Migratory Bird Treaty Act Apply? Has that been described? Are there nesting Bald Eagles?	
117	Gorder		Section 3.3.3.3	Describe the correspondence with FWS that leads to that conclusion. What about state agency consultation, are there any state listed species? Birds? Plants?	
118	Gorder		Section 3.4.1	Please include links in the reference section of the document.	
119	Gorder		Section 3.5	Where is Section 3.5?	
120	Gorder	4-3	6-14	Need to provide a narrative description of what these projects are and what resources could have cumulative impacts. There are no past projects that are appropriate? This list seems limited. What about CSO LRP Project?	
121	Syphax	4-3	6	Add the North Field (unless that concept is dropped)	
122	Syphax	4-4	3	Include the North Field (unless that concept is dropped)	

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(Please provide comment to Joel Gorder)

No.	Commenter	Page	Line number	Comment	Comment Response
123	Gorder	4-4	21	Should read cultural resources, not historic properties.	
124	Gorder	4-8	5	<p>Please provide the correct stipulations that are listed in the DC lands Act on how the transfer is to be carried forward.</p> <p>Line 8. First off, the site is currently administered by NPS, and the use would continue to be appropriate. There would be no negative impacts.</p> <p>Global Comment: Second, while it is not correct, when classifying impacts always describe it in terms of beneficial or adverse, impact threshold (only for adverse impacts), and duration.</p> <p>Lastly, on line 18-19, if in the first paragraph you state that there would be negative impacts from not using the land, then how can you say that there are negligible adverse impacts to the surrounding area?</p>	
125	Gorder	4-8	Cumulative impacts	<p>Global Comment: You cumulative impact analysis needs to describe what projects have cumulative impacts on the particular resource, they need to describe the impacts in terms of beneficial or adverse, impact threshold (only for adverse impacts), and duration.</p> <p>Cumulative actions are those that have additive impacts on a particular environmental resource. It is irrelevant who takes these actions (i.e., they are not confined to NPS or even federal activities), or whether they took place in the past, are taking place in the present, or will take place in the reasonably foreseeable future.</p> <p>As an example, if your park is proposing building a small sewage treatment plant and discharging treated wastewater into a river, other activities (i.e., cumulative actions) that also have an additive impact on the river must be included in the analysis on water quality. These activities might include disposal of wastes from recreational vehicles in the park, cattle ranching upstream of the park on public land, or release of water from a reservoir on private property downstream of the park. If you are preparing a GMP or</p>	

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No.	Comme nterGor der	Page	Line number	Comment	Comment Response
				<p>other broad-scale plan, actions on land adjacent to, or even in the region of, the park unit may have combined impacts on resources inside the park boundaries and need to be included in the cumulative impact analysis. One source of information about methods to analyze cumulative impacts is the CEQ’s January 1997 report, “Considering Cumulative Effects under the National Environmental Policy Act.”</p> <p>I will not comment any further on the cumulative impact analysis for the other topics, I trust they will be revised accordingly. If you need examples or further guidance please call me at 202-619-7405.</p>	
126	Gorder			<p>Global Comment: Throughout this document, whenever discussing the alternatives, impact analysis, cumulative impacts or anything referencing the proposal change “will”s to “would”s. No decision has yet been made.</p>	
127	Gorder	4-9	17-26	You are basing your analysis on personal values	
128	Gorder	4-9	28-30	Why would traffic and noise to the surrounding area stop after construction activities end? How many additional people will be living, spending time, driving to Poplar Point after construction? Won’t traffic increase along with the noise from traffic?	
129	Gorder	4-9	31-35	First real mention of the relocation of Park Police in the Document. How is it going to heavily influence land use? What about the need to move NACE Headquarters? Then we are all the sudden talking about residential development in the same paragraph? Then talking about habitat...There is contiguous habitat there now. Line 35. First mention of this. What location? I assume we are talking about the north field...what do they plan to do there?	
130	Gorder		4.2.1.3- 4.2.1.5	<p>General Comments: Sometime you state context area then you state study area;</p> <p>Overall these sections are poorly written, poorly thought out, poorly organized, and do not provide sufficient details to support what I find to be questionable analysis.</p>	

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No.	Comme nterGor der	Page	Line number	Comment	Comment Response
131	Gorder		Chapter 4 general comments	These are general comments that need to be treated globally throughout Chapter 4. Need to include a thorough and complete discussion of the impacts of moving NPS facilities.	
132	Syphax	4-9	31-33	More discussion needed. It is not sufficient to simply say that relocation USPP to the North Field will “heavily influence land use in that area.” It takes away about 25 acres of riparian open space and critically important recreation space. Add discussion... elaborate on impacts.	
133	Syphax	4-12	5	It remains unclear how the PP project will improve connections to waterfront and surrounding neighborhoods. Explain or delete this.	
134	Syphax	4-14	2	More discussion needed. It is not sufficient to simply say that relocation USPP to the North Field will “heavily influence land use in that area.” It takes away about 25 acres of riparian open space and critically important recreation space. Add discussion... elaborate on impacts.	
135	Syphax	4-17	38-39	More discussion needed. It is not sufficient to simply say that relocation USPP to the North Field will “heavily influence land use in that area.” It takes away about 25 acres of riparian open space and critically important recreation space. Add discussion... elaborate on impacts.	
136	Syphax	4-23	2-35	This interpretation of the project is outrageous. The project violates far too many principles and policies for one to arrive at such an interpretation.	
137	Syphax	4-25	28	Define “SNAPS”	
138	Syphax	6-0	Appendices	Add Ecological Inventories... plant and animal species list.	
139	Syphax	General		Reference 2010 Anacostia Watershed Restoration Plan throughout document, as appropriate.	
140	Gorder	4-52	4.2.5.4	What about the fact that as development occurs on Poplar Point, surrounding land prices will likely go up, which may result in some people that currently live in the neighborhood being driven out because they can no longer afford to live there. Need to explain why this would or would not happen.	

