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September 12, 2022

Mr. Jeffrey Reinbold
Superintendent
NPS – National Mall and Memorial Parks
900 Ohio Drive, SW
Washington, DC 20024

Dear Superintendent Reinbold:

The FDR Memorial Legacy Committee (FDR Committee) appreciates the opportunity to provide a public comment on the project - Rehabilitate Tidal Basin and West Potomac Park Seawall Environmental Assessment - as outlined in the public scoping meeting on July 19, 2022. The FDR Committee, founded in 2019, is a citizen led organization with the mission to promote education about the FDR Memorial, to improve inclusion and accessibility so all visitors can experience the Memorial, and to preserve the Memorial for future generations. The organization, borne out of the successful disability led campaign in the 1990s for disability representation at the Memorial, is committed to sharing the diverse perspectives of the Roosevelt era and that era's legacy today.

We thank the National Park Service (NPS) for its attention to the seawalls which are so vital to protecting many national treasures. We submit the following as part of the public comment period for this project. We respectfully request responses to our questions in a timely manner.

1. Flooding concern for other Memorials

What modeling has been done to provide assurances that the work done in the proposed area will not cause flooding in other areas of the Tidal Basin, including at the FDR Memorial? Please provide the modeling used and the results. In addition, we ask for information on how water will be averted from flowing into the end section of the FDR Memorial given that the seawall repair terminates at that location.

2. Geology map

Given that anchoring to bedrock is a critical part of this project, we request a map and/or study that clearly demarcates the location and extent of bedrock in the affected area of the Tidal Basin. Also requested is mapping of expected land settling. It is our understanding that one of the fountains at the FDR Memorial is not flowing as intended due to land settling. Such a mapping is necessary for more complete understanding of this project.

3. Seawall elevation precedent

It is understood that this project is one of many phases for repair of the seawall around the entire Tidal Basin. It is also understood that the seawall will be elevated around the entire Tidal Basin at a level of two to three feet. Therefore, this project can be precedent setting as it may dictate the nature and height of all seawall repair at the Tidal Basin. This raises questions about the preservation of the cultural landscape. When will a cultural landscape report that includes the FDR Memorial be available? If not yet underway, we ask for one

to be completed as soon as possible so that the appropriate considerations can be made in this critical planning stage.

In addition, given the precedent setting nature of the repair for the rest of the Tidal Basin, 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.

4. 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?

5. Commission of Fine Arts and the National Capital Planning Commission

What are the dates for the expected presentations to these entities?

6. Army Corps of Engineers

What coordination is underway with the Army Corps of Engineers regarding their project reported on 4/4/22 <https://wtop.com/dc/2022/04/tidal-basin-flood-gates-to-begin-first-phase-of-repairs/>?

7. Presentation of assets

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.

8. Consulting Parties

The NPS website has a link to a recording and PowerPoint from a meeting on August 2, 2022 with consulting parties to review the project. Per 36 CFR § 800.2 - Participants in the Section 106 process: "Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties."

FDR Committee Chair Helena Berger and I appreciated the opportunity to discuss the project with Superintendent Reinbold and Assistant Superintendent Kennealy on August 24, 2022. Such one-on-one communication is essential with stakeholders such as ourselves. In addition, given our special commitment to the FDR Memorial and our experience in accessibility and inclusion practices, we believe we fit the criteria described above for status as a consulting party and look forward to invitations to future meetings.

We look forward to your responses and to continued engagement in this important project.

Sincerely,



Mary E. Dolan
Co-Founder and Executive Director

cc: Board of Directors, FDR Memorial Legacy Committee
Advisory Board, FDR Memorial Legacy Committee