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May 3, 2018

Mr. Alexcy Romero
Superintendent
George Washington Memorial Parkway
National Park Service
700 George Washington Memorial Parkway
McLean, Virginia 22101

Dear Superintendent Romero:

Arlington County is pleased to comment on the Draft Cultural Landscape Report and Environmental Assessment - Theodore Roosevelt Island and George Washington Memorial Parkway (CLR/EA) and strongly supports the National Park Service's efforts to rehabilitate Theodore Roosevelt (TR) Island's historical, cultural and natural resources. These resources are highly valued by both tourists and residents of Arlington County and the District of Columbia.

The report presents an impressive account of the TR Island's history. Further research with respect to the possibility of Civil War-era burials, including the burial of Freedman Village residents, on the island may be merited. Any final report should reflect the outcome of this research and discuss mitigation plans for the potential discovery of human remains.

Arlington County's loss of access to the Potomac River, which occurred during TR Island's Presidential Memorial period (1931-1967) as a result of the George Washington Memorial Parkway's extension north to connect to the Capital Beltway, has only heightened the County's interest in improving waterfront access for its residents and visitors. Today, visitor access to TR Island is limited to two non-motorized trail connections and vehicle access that is constrained geographically by the limited number of parking spaces available on site. Despite the poor condition of the trails and the absence of directional signage, data collected at the bike and pedestrian counters on the pedestrian bridge and on the north sidewalk of the Theodore Roosevelt Bridge confirm high trail usage. In calendar year 2015, there were 649,159 bicycle and pedestrian counts across the pedestrian bridge and 145,408 bicycles and pedestrian counts on the Theodore Roosevelt Bridge. (More data can be generated from the *BikeArlington County Dashboard* at http://counters.bikearlington.com/? ga=2.226873429.951145417.1524245982-1135532958.1517844304.)

The County believes non-motorized access to TR Island should be improved. It has identified both short-term and longer-term measures to improve non-vehicle access. Over the short term and within the scope of this report, the County recommends locating wayfinding and interpretive signage in Rosslyn that could improve pedestrian, bicycle and transit access. Opportunities for non-motorized watercraft to land at TR Island is also a positive development.

Over the longer term, the County encourages the Park Service to consider some of the pedestrian and bicycle improvements envisioned in the Rosslyn Area Plan: A Plan for the Rosslyn Coordinated Redevelopment District that was adopted by the Arlington County Board in July, 2015; https://projects.arlingtonva.us/plans-studies/land-use/realize-rosslyn/. Many of the plan's recommended recreational and pedestrian improvements, such as widening the bike lane on Theodore Roosevelt Bridge, would improve connections to TR Island and the Mount Vernon Trail and improve Park Service visitors' experiences.

Finally, the County greatly appreciates the report's discussion of the proposed Arlington Boathouse (Page 7-3) and agrees with its positive assessment that the boathouse will increase access and recreational opportunities for non-motorized watercraft along the Virginia shoreline. A future boathouse in the report's study area would also appear to be consistent with the historical account of TR Island's use as a recreational resource by the Columbia Athletic Club and the Washington Canoe Association (Pages 2-13 - 2-21).

While an evaluation of the Arlington boathouse proposal falls outside the scope of the report, the County notes that its presence could contribute significantly to addressing several of the report's objectives. The proposed recreational facility at the upper Rosslyn Circle site could house and display the historical artifacts presently stored at Gunston Hall (Page 5-8) and provide a sheltered location where the Park Service could present a more detailed history of TR Island including possible classroom and laboratory space for educational and cultural experiences. The proposed launch and storage facility site at the foot of the pedestrian bridge could also serve as the focal point for the Potomac Heritage Trailhead, "formalizing trail access" for hikers (Page 5-18) and supplement the services offered at the comfort station by reducing demand for a second comfort station at the South Parking Area. (Pages 6-4 – 6-13).

Enclosed with this letter are additional comments and graphs referencing specific topics within the draft report.

Thank you for the opportunity to provide comments.

Sincerely,

Mark J. Schwartz County Manager

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Enclosure

cc: The Honorable Don Beyer, United States House of Representatives The Honorable Tim Kaine, United States Senate The Honorable Mark R. Warner, United States Senate

Draft Cultural Landscape Report and Environmental Assessment Theodore Roosevelt Island and George Washington Memorial Parkway

Additional Arlington County Comments

Historic Preservation

Chapter 2: Site History

American Indian Period (2-1, Figure 2)

Ensure that the representation of the Native Americans in the 1940s mural is culturally sensitive and not a misrepresentation of their clothing/customs

Civil War Occupation

- There is an earlier reference of a lack of primary resources regarding Mason's Island during this time. Did the researchers review materials at the National Archives?
 - Significant documents about freedmen in Washington are also in series of records that appear unlikely to include such information. A report of the inspection of the camp on Mason's Island among the records of the Inspector General shows that the camp was established as a general depot for hiring out the freedmen and makes more comprehensible the register in RG 105 of freedmen departing from Mason's Island. [Record Group 105 and Record Group 159]

Civil War Occupation (2-12)

- Provide a source for paragraph three:
 - https://books.google.com/books?id=w6lpQbYEZC4C&dq=%22mason's%20Island%22&pg=PR2#v=onepage&q=%22mason's%20Island%22&f=false
- Consider referencing the following view of Mason's Island (ca. 1862-1865), http://www.loc.gov/pictures/item/cwp2003000921/PP/

Chapter 5: Analysis and Evaluation

Integrity (4-5)

- For setting, state that it retains sufficient integrity of setting to reflect the period of significance (call out which ones).
 - Currently, the section of setting just says it's compromised.

Bibliography

> The following source had not been utilized in the document. The subject matter expert should review the following book: Roosevelt Memorial Association, Analostan Island, the

site for the National Memorial to Theodore Roosevelt in Washington (New York: Roosevelt Memorial Association, Inc., 1931), https://catalog.hathitrust.org/Record/006578948.

o This resource provides both photographs and information about the state of the island. Consider review of this material and inclusion if appropriate.

Recreational

Circulation

Providing universal access from the parking lot to the memorial site and additional accessible trail routes to vistas throughout the island is a necessity with this project. Consider providing a universally accessible loop trail which will provide access to notable cultural resources and river vistas on the island while balancing protection of the natural and cultural resources on TR Island.

Buildings & Structures

Reconsider the NPS preferred Option 1 titled, "Rehabilitation Treatment". This option calls for the rehabilitation of the existing comfort station for continued use as a restroom facility in its current location on the south side of the island. Option 2 titled, "Adaptive Reuse and Construction Treatment" is a better option for visitors, because it provides permanent restroom facilities in the parking lot where they would be visible, safer, and easier to reach. These facilities would serve both visitors to TR Island and trail users. As stated in this option, the existing comfort station would be preserved as a historic resource but reused for other purposes.

Natural Resources

Vegetation

- The plan to abandon and restore a number of the social trails on the island, especially at the north end of the park is greatly needed. Consider basing the selection of trail closures on those most prone to erosion or with the highest wildlife habitat potentials.
- Invasive plant control and habitat restoration will be essential to the long-term ecological value of TR Island, and maintenance funding for this should be included in the long-term planning for the island.
- Check nativity of plants shown in Table 1. List of Vegetation on TR Island with the Digital Atlas of the Virginia Flora: vaplantatlas.org. For example, Bald Cypress and Southern Magnolia are not native to this region, and were likely planted on TR Island.
- Check Map 12 on page 215 for accuracy of the legend. It appears to have a discrepancy between the color scheme variations and the number ranges the colors are intended to reflect.

