

The Committee of 100
 on the Federal City



**National Park Service, Department of the Interior
 Comments on the Fort Lincoln Transfer Project
 Nancy MacWood, Chair, Committee of 100 on the Federal City, June 2013**

The Committee of 100 has had a long and well-known interest in the parks of the nation's capital, especially those owned by the National Park Service (NPS), including the Civil War Defenses of Washington (CWDW) – A.K.A. Fort Circle Parks. We were, in fact, the major commenter on the NPS draft management plan for the CWDW in 2003 and met frequently with the NPS regional director(s) and staff concerning the development and implementation of the final plan, which was published in 2004.

Hence it was a great surprise to us to learn recently of the NPS proposal to transfer nearly an acre of land at Fort Lincoln at the corner of Eastern Ave. and Bladensburg Road to the DC government for a private townhouse development. We were not notified of this as part of the scoping process last year, and given no opportunity to express our views or attend the scoping meeting on the proposal.

Upon learning of this undertaking, we immediately requested and received a copy of the NPS Environmental Assessment (EA) dated May 2013. We see from the EA that planning for this project has been in the works for several years. Yet at no time during our frequent meetings with NPS over the past 10 years were we even told that NPS retained ownership of any land at Fort Lincoln and the draft and final management plans are silent in that regard.

It is obvious from the documentation in the EA that NPS intends to proceed with this transfer. We deeply regret it, as the land in question is the remaining link from Fort Lincoln to the other CWDW lands along Eastern Avenue all the way to Fort Totten and beyond. Town houses can be built most anywhere; historic park land is irreplaceable.

That said, we would like to make the following comments and recommendations:

- (1) **Compensation.** The EA does not say whether NPS will receive financial or other compensation for the transfer of this valuable land at the intersection of two major streets. We feel that if NPS is giving up title to the land as well as jurisdiction, it should receive something of equal value in return. The 2004 Management Plan called for a 23-mile hiker-biker trail to link the CWDW around DC. This was amplified in the 2012 CWDW Long-Range Interpretive Plan. At a minimum, a suitable portion of the Fort Lincoln land to be transferred should be retained as part of the CWDW hiker/biker trail and/or the DC government or future developer should be required as part of the conditions of the transfer to provide it. A sidewalk, as mentioned in the EA, is not a satisfactory substitute.

- (2) **Precedence.** We are extremely concerned about the precedence this project may have for transfer of other lands that are part of the CWDW or other NPS parks that we may not know about – where NPS has ownership of land but, through agreements, has given jurisdiction to DC (parts of Forts Dupont and Greble are examples) or other agencies (the Smithsonian, at Fort Ricketts). The CWDW are nationally significant, historically important lands – not just local parks. While we welcome local use of the national parks, where appropriate, we also are very concerned that insufficient attention has been given to managing and interpreting the CWDW as part of the history of the nation’s capital. We urge NPS to give them a higher priority than has heretofore been the case.
- (3) **Process.** Public involvement in developing and reviewing the EA for this project seems to have been focused solely on the local community in and around Fort Lincoln. City-wide organizations such as the Committee of 100 and others (national and regional) concerned about NPS parks and historic preservation, should be routinely notified if there are any similar projects or use agreements being planned. These are lands owned by all of the people of the United States. We should not be the last to hear about what happens to them.

Thank you for the opportunity to present our comments.

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